

Consideration of Comments on First Ballot of MOD-013

Summary Consideration:

The drafting team did not make any changes to MOD-013 as a result of the comments submitted with the first ballot.

There were several commenters who suggested that the standard be modified to require that entities provide actual data once the facility has been commissioned. The drafting team interpreted R1.1 as being applicable before commissioning and R1.2 as being applicable after commissioning, and modifying R1.2 is outside the scope of the work assigned to the drafting team. It is expected that this data will be forwarded to the Region under the Region's requirements for data submittal.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Company	Balloter	Vote	Comment
Con Edison Company of New York CEPD	Edwin Thompson	No	Section R1.1 should include a statement stating "once the facility is commissioned, actual dynamic data shall be provided".
Response: R1.1 deals with the time period before the facility goes into service. R1.2 applies after commissioning. R1.2 could not be modified to make the interplay of R1.1 and R1.2 clearer because the drafting group was limited by the scope of this work.			
Dominion Virginia Power VAP	William Thompson	No	The problem is R 1.4. Obtaining this data (dynamic load data) based on frequency and voltage would not be easy or practical. Additionally, even if the data could some how be obtained, there is no real industry standard or procedure for modeling demand characteristics in this manner.
Response: R1.4 is a Version 0 requirement that was not modified by the drafting team because it was outside the scope of this effort. For a formal interpretation of the requirements that are outside the scope of the Phase III & IV Drafting Team, please follow the process outlined in the Reliability Standards Process Manual for 'Interpretations'. If you wish to recommend changes to the requirements that are outside the scope of the Phase III & IV Drafting Team, please consult the Reliability Standards Process Manual on how to submit a Standards Authorization Request.			

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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Hydro One Networks Inc.	Ajay Garg	No	We have concerns with the use of "estimated or typical data" when design data is not available. Accurate studies cannot be performed with just typical data. We request that the standard be modified to require that actual commissioning data be used in studies prior to actual operation. There should be a requirement that the facility owner provides this information prior to commissioning, as a condition for connection to the system.
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2 applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
International Transmission Company	Jim Cyrulewski	No	ITC Transmission is voting No on this standard. While ITC Transmission supports the need for a standard that established consistent data requirements, reporting procedures and system models to be used in the analysis of the reliability of the bulk electric system, ITC Transmission cannot support the Levels of Compliance currently proposed. ITC Transmission believes there should only be one level of non-compliance, Level 4. To perform studies all the information required is needed.
<p>Response: This standard deals with the need for a Regional Reliability Organization to have reporting procedures so that entities supply the data required. The actual supply of the information is contained in MOD-012.</p>			
New Brunswick Power Transmission Corporation	Wayne Snowdon	No	We suggest that R1.1.1 should be deleted and R1.1 modified as follows: "Design or typical data, if design data is unavailable, shall be provided for new or refurbished excitation systems (for synchronous generators and synchronous condenser) at least three months prior to the installation date, and actual data shall be provided once the facility is in-service". In addition most participating members of NPCC believe that three months is not enough time. NPCC Members have indicated that they cannot do our studies with typical data that will likely not reflect the actual parameters of the new or refurbished facility. We request this Standard be changed to require actual commissioning data, once the testing has been completed, for further, more accurate studies to be accomplished, prior to actual operation. In addition, there must be a deadline for the facility owner to provide this information since once the commissioning is done, the commissioning agents leave, making it very difficult to get the test data for the facility. Without these additional requirements, there is not assurance that future studies will accurately capture the actual parameters of the new or refurbished facility.

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<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
<p>New York State Electric and Gas Corporation NYET</p>	<p>Henry G Masti</p>	<p>No</p>	<p>We support the New York State Reliability Council (NYSRC) comments. In order to make this standard acceptable we suggest that R1.1.1 be deleted and R1.1 modified as follows: "Design or typical data, if design data is unavailable, shall be provided for new or refurbished excitation systems (for synchronous generators and synchronous condenser) at least three months prior to the installation date, and actual data shall be provided once the facility is in-service". TOs should not be required to conduct studies using typical data that will likely not reflect the actual parameters of the new or refurbished facility. This standard should be changed to require actual commissioning data once the testing has been completed. This is to permit more accurate studies to be performed prior to actual operation. In addition, there must be a deadline for the facility owner to provide this information since once the commissioning is completed and the commissioning agents leave, it would be very difficult to obtain the test data for the facility. Without these additional requirements, there is no assurance that future studies will accurately capture the actual parameters of the new or refurbished facility</p>
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
<p>NE-ISO</p>	<p>Kathleen Goodman</p>	<p>No</p>	<p>ISO New England suggests that, in order to enhance this standard to further support reliability, the following changes be made:</p> <p>R1.1.1 should be deleted and R1.1 modified as follows: "Design or typical data, if design data is unavailable, shall be provided for new or refurbished excitation systems (for synchronous generators and synchronous condenser) at least three months prior to the installation date, and actual data shall be provided once the facility is in-service". In addition, we request the three-month notification be revisited and possibly extended because three months may not be enough time to incorporate into models.</p> <p>We request this Standard be changed to require actual commissioning data, once the testing has been completed, for further, more accurate studies to be accomplished, prior to actual</p>

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			<p>operation. In addition, there must be a deadline for the facility owner to provide this information since once the commissioning is done, the commissioning agents leave, making it very difficult to get the test data for the facility. Without these additional requirements, there is not assurance that future studies will accurately capture the actual parameters of the new or refurbished facility.</p> <p>While ISO New England strongly believes and supports the need for NERC Standards and generally believes there are many positive attributes embedded in this Standard, we believe it requires further refinement to enhance interconnected reliability.</p>
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p> <p>R1.1 deals with the time period before the facility goes into service. R1.2 applies after commissioning. The three-month period is a consensus period determined from industry comments.</p>			
Nova Scotia Power NSPI	David D Little	No	<p>There should be a requirement to provide the actual excitation design data by the time of installation. Also there is a concern that providing typical design data may be inappropriate to conduct an interconnection study. Also, providing the date three months in advance of the in-service date is insufficient time to incorporate the analysis into the interconnection studies that may identify system upgrades required to connect the unit.</p>
<p>Response: R1.1 deals with the time period before the facility goes into service. R1.2 applies after the facility goes into service. The three-month period is a consensus period determined from industry comments.</p>			
New Brunswick System Operator	Alden Briggs	No	<p>There should be requirement to provide the actual excitation design data by the time of installation is needed and also there is concern that providing typical design data may be inappropriate to conduct an interconnection study. Also providing the date three months in advance of the in-service date is insufficient time to incorporate the analysis into the interconnection studies that may identify system upgrades required to connect the unit.</p>
<p>Response: R1.1 deals with the time period before the facility goes into service. R1.2 applies after the facility goes into service. The three-month period is a consensus period determined from industry comments.</p>			

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New York Independent System Operator NYIS	Gregory Campoli	No	<p>The NYISO would like to raise the following concerns: The NYISO suggests that R1.1.1 should be deleted and R1.1 modified as follows: "Design or typical data, if design data is unavailable, shall be provided for new or refurbished excitation systems (for synchronous generators and synchronous condenser) at least three months prior to the installation date, and actual data shall be provided once the facility is in-service". Studies should not be performed with typical data that will likely not reflect the actual parameters of the new or refurbished facility. In addition, there must be a deadline for the facility owner to provide this information since once the commissioning is done, the commissioning agents leave, making it very difficult to get the test data for the facility.</p>
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
New York State Reliability Council	Alan Adamson	No	<p>The New York State Reliability Council (NYSRC) has voted NO on draft Standard MOD-013-1. In order to make this standard acceptable we suggest that R1.1.1 be deleted and R1.1 modified as follows: "Design or typical data, if design data is unavailable, shall be provided for new or refurbished excitation systems (for synchronous generators and synchronous condenser) at least three months prior to the installation date, and actual data shall be provided once the facility is in-service". The New York Independent System Operator (NYISO) and New York's TOs should not be required to conduct studies using typical data that will likely not reflect the actual parameters of the new or refurbished facility. We request that this standard be changed to require actual commissioning data once the testing has been completed. This is to permit more accurate studies to be performed prior to actual operation. In addition, there must be a deadline for the facility owner to provide this information since once the commissioning is completed and the commissioning agents leave, it would be very difficult to obtain the test data for the facility. Without these additional requirements, there is no assurance that future studies will accurately capture the actual parameters of the new or refurbished facility.</p>
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			

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Northeast Power Coordinating Council	Edward Schwerdt	No	NPCC is concerned with the use of typical data to conduct reliability studies. The standard should include a requirement to provide the actual excitation design data no later than three months in advance of the in-service date.
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
Hydro One Networks Inc	Mike Penstone	No	We have concerns with the use of "estimated or typical data" when design data is not available. Accurate studies cannot be performed with just typical data. We request that the standard be modified to require that actual commissioning data be used in studies prior to actual operation. There should be a requirement that the facility owner provides this information prior to commissioning, as a condition for connection to the system.
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
Detroit Edison	Ronald Bauer	No	Not convinced that the Level 1 and Level 2 of Non-compliance are appropriate since it is essential that complete data is provided. Maybe only need level 3 and 4 compliance for this standard.
<p>Response: Level 1 non-compliance allows for an escalating level of non-compliance due to inadequacies in Regional Reliability Council procedures and a lower level of non-compliance for underdeveloped documentation.</p>			
California Energy Commission	William Mitchell Chamberlain	No	The standard would be revised to incorporate a requirement to provide excitation system design data so it can be incorporated into dynamic system modeling. If the design data is not available 3 months prior to installation, typical or estimated data may be provided. However, the latest version of the standard dropped the requirement that updated data will be provided by the in-service date. Correct data is required to perform accurate analyses in the local area. Additionally, study base cases with multiple instances of inaccurate data become corrupted over time and is very difficult to resolve. A requirement to provide the actual excitation design data by the time of installation is needed.

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<p>Response: R1.1 deals with the time period before the facility goes into service. R1.2 applies after the facility goes into service. R1.2 could not be modified to make the interplay of R1.1 and R1.2 clearer because the drafting group was limited by the scope of this work.</p>			
New York State Public Service Commission	James T Gallagher	No	Studies need to be performed using data specific to the actual excitation system that is installed. Could not find in the comments any support for the carve out in section R1.1.1. to allow estimated or typical data to be substituted for actual excitation system design data.
<p>Response: Generation developers run the risk of unknown dynamic problems limiting the full capability of their units if an accurate model of their facility is not evaluated. So we would expect them to provide the best information they have available be it design or "estimated or typical". R1.2, which deals with supplying accurate modeling data, applies after commissioning and we expect that the commissioning data will be provided after commissioning occurs.</p>			
Avista Corp. AVA	Scott James Kinney	Yes	Several comments were suggested during the review of this standard to add additional measures to the standard so that there is a measurement for every requirement. The Drafting team indicated that this was outside their scope of work. Please make sure the other drafting team that is adding measures and compliance elements to those Version 0 Standards that were missing these elements, review and consider the comments that this drafting team (MOD-013-1) were unable to address.
<p>Response: The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to 22 Version 0 standards that were incomplete when approved, including MOD-013.</p>			
Great River Energy GRE	Gordon Pietsch	Yes	The effective date should be 9 months after BOT adoption as the Regions have a heavy work load already in 2006. The Planning authority should be added to R1.
<p>Response: This is the first MOD standard to be modified and is considered an important change that should be implemented as soon as possible. This is a modification to an already approved Version 0 standard, entities should already be compliant with most of the requirements. This standard deals specifically with the Regional Reliability Council's procedure documentation requirements. A Planning Authority has no requirements under this standard. Actually supplying the data is contained in MOD-12.</p>			
Nebraska Public Power District NPPD	Alan Boesch	Yes	Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006

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San Diego Gas & Electric Co. SDGE	Linda P Brown	Yes	SDG&E votes to approve this SAR and supports the WECC position that the other drafting team add the measures and compliance elements that are missing.
<p>Response: The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to 22 Version 0 standards that were incomplete when approved, including EOP-005.</p>			
SaskPower SPC	Wayne Guttormson	Yes	SaskPower recommends that the effective date be 9 months after BOT adoption as the Regions have a heavy workload already for 2006, and that the Planning Authority be added to R1.
<p>Response: This is the first MOD standard to be modified and is considered an important change that should be implemented as soon as possible. This standard deals specifically with the Regional Reliability Council's procedure documentation requirements. A Planning Authority has no requirements under this standard. Actually supplying the data is contained in MOD-12.</p>			
Midwest Reliability Organization	William J. Head	Yes	Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006. Planning Authority should be added to R1.
<p>Response: This is the first MOD standard to be modified and is considered an important change that should be implemented as soon as possible. This is a modification to an already approved Version 0 standard, entities should already be compliant with most of the requirements. This standard deals specifically with the Regional Reliability Council's procedure documentation requirements. A Planning Authority has no requirements under this standard. Actually supplying the data is contained in MOD-12.</p>			
Lincoln Electric System LES	Bruce E Merrill	Yes	Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006. Planning Authority should be added to R1.
<p>Response: This is the first MOD standard to be modified and is considered an important change that should be implemented as soon as possible. This standard deals specifically with the Regional Reliability Council's procedure documentation requirements. A Planning Authority has no requirements under this standard. Actually supplying the data is contained in MOD-12.</p>			

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Avista Corp. Washington Water Power Division AVWP	Edward F. Groce	Yes	Several comments were suggested during the review of this standard to add additional measures to the standard so that there is a measurement for every requirement. The Drafting team indicated that this was outside their scope of work. Please make sure the other drafting team that is adding measures and compliance elements to those Version 0 Standards that were missing these elements, review and consider the comments that this drafting team (MOD-013-1) were unable to address.
<p>Response: The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to all Version 0 standards that were incomplete when approved, including EOP-005.</p>			
Lincoln Electric System LES	Dennis Florom	Yes	Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006. Planning Authority should be added to R1.
<p>Response: This is the first MOD standard to be modified and is considered an important change that should be implemented as soon as possible. This standard deals specifically with the Regional Reliability Council's procedure documentation requirements. A Planning Authority has no requirements under this standard. Actually supplying the data is contained in MOD-12.</p>			
National Association of Regulatory Utility Commissioners	Diane Jean Barney	Yes	In the ballot version of the standard, the explicit requirement that actual excitation system design data must be provided by the in-service date (if typical or estimated data was previously provided) was deleted. Implementation of the standard and compliance should ensure that section R1.2 require the actual data be provided no later than the in-service date.
<p>Response: R1.1 deals with the time period before the facility goes into service. R1.2 applies after the facility goes into service. R1.2 could not be modified to make the interplay of R1.1 and R1.2 clearer because the drafting group was limited by the scope of this work.</p>			