

**Individual or group. (18 Responses)**

**Name (10 Responses)**

**Organization (10 Responses)**

**Group Name (8 Responses)**

**Lead Contact (8 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)**

**Comments (18 Responses)**

**Question 1 (18 Responses)**

**Question 1 Comments (18 Responses)**

Individual
Chris Scanlon
Exelon
Yes
The Exelon Companies, PECO, ComEd and BGE, agree that removing "Widespread" from the text of the standard satisfies the concerns raised by FERC. We believe this is an efficient and effective approach to clarify the standard language and complete the Project so that implementation can begin in earnest.
Individual
Amy Casuscelli
Xcel Energy
Yes
Individual
Mike Smith
Manitoba Hydro
Yes
No comment.
Group
Tennessee Valley Authority
Dennis Chastain
Yes
Group
Northeast Power Coordinating Council
Guy Zito
Yes
Individual
Mark Wilson
Independent Electricity System Operator
Yes

Group
Bonneville Power Administration
Andrea Jessup
Yes
BPA has no issues with the removal of the term "widespread" since it is not used elsewhere and is not a Continent-wide Term referenced in the NERC Glossary of Terms Used in Reliability Standards. However, NERC needs to be very clear and concise as to how they define a facility as "critical" and what constitutes "critical impact" to the interconnection to ensure there is no room for interpretation among entities. BPA believes that the definition in Requirement R1 should not be dependent on how an applicable entity interprets the term "widespread" but instead should be modified to make clear that a facility that has a critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1.
Individual
Mike Smith
Manitoba Hydro
Yes
No comments.
Individual
Maryclaire Yatsko
Seminole Electric Cooperative, Inc.
Yes
Individual
David Thorne
Pepco Holdings Inc.
Yes
Group
Dominion
Connie Lowe
Yes
Individual
David Kiguel
David Kiguel
Yes
The SAR Information Section states that "The primary goal of this SAR is to allow the Standard Drafting Team (SDT) for Project 2014-04, Physical Security to develop a standard(s) to address the directives of the March 7, 2014 FERC Order ....." This Section should be modified to reflect the fact that the purpose of the SAR is to allow the SDT to modify the requirements of the existing Standard CIP-014-1 (Physical Security) to address the directives of FERC.
Individual
Andrew Z. Pusztai

American Transmission Company, LLC
Yes
Individual
David Jendras
Ameren
Yes
Group
Duke Energy
Michael Lowman
Yes
Duke Energy agrees with the proposed revisions to the SAR, including the removal of the term "widespread" from the standard. In FERC Order 802, the Commission directed NERC to remove the term "widespread", or in the alternative, propose specific modifications to the Reliability Standard that address the Commission's concerns. Duke Energy recommends that if the drafting team considers making modifications to the Standard to address the FERC's concerns, that the team consider inserting the language "critical impact on the operation of the interconnection" into the Standard. We feel that this language helps clarify and narrow down possible interpretations of what constitutes instability within an interconnection.
Group
ACES Standards Collaborators
Jason Marshall
Yes
We agree the proposed changes to the SAR address the Commission directive. However, we caution the drafting team to consider carefully how simply removing "widespread" could alter the original intent of the requirement. Widespread was added to reflect that there can be local stability issues that will not jeopardize the reliability of the overall bulk electric system. If the loss of Transmission substation or station will only cause a local stability issue, we do not believe it should be identified as requiring physical security measures. We believe this view is consistent with the intent of original FERC order directing the creation of the standard.
Group
Large Public Power Council
Joe Tarantino
Yes
The members of the Large Public Power Council agree with either the removal or modification of the word "widespread" in the Physical Security Standard to address the Commission's concern. However, we urge the Standard Drafting Team to address the following: Any clarification made to the CIP-014 Standard should be consistent with current applicable standards, for example in the TPL-001-4 standard Requirement R6 requires the Transmission Planner and Planning Coordinator to define their criteria or methodology used in the analysis for the identification of System instability. This approach should not subject certain Facilities to the CIP-014 standard where acceptable conditions are met through acceptable performance criteria identified by the TP/PC and thereby would not deem a particular Facility as having a critical impact on the operation of the interconnection. Additionally, some degree of flexibility may be necessary across regions. Performance characteristics are potentially different between the Eastern Interconnect and the Western Interconnect; one region may be more sensitive to frequency stability while the other may be more sensitive to voltage

stability. Those Regional differences would be considered/accounted for through the TP/PC's documentation of System instability (TPL-001-4 R6).
Group
SPP Standards Review Group
Robert Rhodes
No
While we may agree with the removal of the term 'widespread' we at the same time have concerns that the intent that widespread gives the standard be captured in additional language to include specificity and structure in the standard. We don't need the standard to be about capturing small, insignificant events but at the same time we need to be sure we are capturing the events that need to be captured. We also need to be sure that anything that is added does not conflict and is consistent with existing standards such as TPL-001-4, R6. The phrase '...on the removal of the term widespread or alternatively propose modifications that address the Commission concerns in Order 802.' should be rewritten as '...on the removal of the term "widespread" or alternatively propose modifications that address the Commission's concerns in Order 802.' for consistency with its use in the 3rd paragraph in the Industry Need section. Should the Load-Serving Entity be deleted from the list of Reliability Functions in the SAR?