The Reliability Coordination SAR Requesters thank all commenters who submitted comments on Draft 1 of the Reliability Coordination SAR. This SAR was posted for a 30- day public comment period from January 15 through February 14, 2007. The requesters asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 11 sets of comments, including comments from more than 31 different people from more than 15 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

While most stakeholders agreed with the reliability-related need to modify the standards addressed by this SAR, most stakeholders disagreed with the proposed scope of the original SAR and the drafting team made the following revisions to reduce the scope:

- Revised the purpose statement to more narrowly focus on the reliability-related purpose of revising the set of standards addressed by the SAR
- Removed the standards that were listed in the original SAR that are still under development, including the certification standards (ORG-020-1 through ORG-027-1), the Version 1 IROL Standards that are still under development (IRO-007-1 through IRO-013-1) and the standards that are identified in the Version 1 IROL Implementation Plan as proposed for retirement when the Version 1 IROL Standards become effective (IRO-003-1, IRO-004-1).
- Removed the paragraph that referenced facilities.
- Removed the paragraph that would have allowed the standard drafting team to make 'any' additions to requirements as long as those additions met stakeholder approval.
- Added more specificity to the drafting team's approach to modifying the set of standards identified in the SAR.

Based on the comments received, the drafting team is posting the revised SAR for another comment period.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

http://www.nerc.com/~filez/standards/Reliability-Coordination_Project_2006-6.html

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 Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Reliability Standards Development Procedures: http://www.nerc.com/standards/newstandardsprocess.html.

Commenter		Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
1.	Jason Shaver	American Transmission Co.	✓									
2.	David Kiguel	Hydro One Networks, Inc.	✓									
3.	Roger Champagne	Hydro Québec TransÉnergie	✓									
4.	Ron Falsetti	Independent Electricity System Operator		✓								
5.	Kathleen Goodman	ISO New England		✓								
6.	Charles Yeung (SPP)	ISO/RTO Council		✓								
7.	Mike Calimano (NYISO)	ISO/RTO Council		✓								
8.	Alicia Daughtery (PJM)	ISO/RTO Council		✓								
9.	Ron Falsetti (IESO)	ISO/RTO Council		✓								
10.	Matt Goldberg (ISONE)	ISO/RTO Council		✓								
11.	Brent Kingsford (CAISO)	ISO/RTO Council		✓								
12.	Anita Lee (AESO)	ISO/RTO Council		✓								
13.	Steve Myers (ERCOT)	ISO/RTO Council		✓								
14.	Bill Phillips (MISO)	ISO/RTO Council		✓								
15.	Brian Thumm	ITC Transmission	✓									
16.	Jim Cyrulewski	JDRJC Associates								✓		
17.	Jason Marshall	Midwest ISO Stakeholders Standards Collaboration Participants		✓								
18.	Phil Riley	PSC of South Carolina									✓	
19.	Mignon L. Clyburn	PSC of South Carolina									✓	
20.	Elizabeth B. Fleming	PSC of South Carolina									✓	
21.	G. O'Neal Hamilton	PSC of South Carolina									✓	
22.	John E. Howard	PSC of South Carolina									✓	
23.	Randy Mitchell	PSC of South Carolina									✓	
24.	C. Robert Moseley	PSC of South Carolina									✓	
25.	David A. Wright	PSC of South Carolina									✓	
26.	Mike Gentry	Salt River Project	✓									✓
27.	Nancy Bellows (WACM)	WECC Reliability Coordination Comments Work Group										✓
28.	Jack Bernhardsen (PNSC)	WECC Reliability Coordination Comments Work Group										✓
29.	Bob Johnson (PSC)	WECC Reliability Coordination Comments Work Group										✓
30.	Frank McElvain (RDRC)	WECC Reliability Coordination Comments Work Group										✓
31.	Greg Tillitson (CMRC)	WECC Reliability Coordination Comments Work Group										✓

Index to Questions, Comments, and Responses

1. Do you agree that there is a reliability-related need for the proposed revisions to this set of standards? If not, please explain in the comment area. 4
2. Do you agree with the scope of the SAR? If not, please explain in the comment area. 6
3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project? 11

1. Do you agree that there is a reliability-related need for the proposed revisions to this set of standards? If not, please explain in the comment area.

Summary Consideration: Most commenters indicated that they do believe that there is a reliability-related need for the proposed revisions to the standards.

Question #1			
Commenter	**Yes**	**No**	**Comment**
ISO/RTO Council ISO New England	☑	☑	The IRC and ISO-NE agrees with the objective but does not agree with the process. We agree there is a general need to clean up the standards and where appropriate consolidate the standards. However, this SAR covers too large a swath of standards, and as a consequence the resulting standard has the potential of being too large for reasoned comments. The SRC believes that the wide perspective proposed by this SAR could compromise the internal consistency within individual standards. Subject Matter experts created interrelated requirements in given areas. This SAR proposes to impose a vertically integrated prospective, linking standards in widely dispersed areas of operational expertise. While a review of the vertical integration is useful and in places needed, it is recommended that the results of the review should themselves be sent as recommended SARs for industry consideration by the SMEs for the individual standards, and not as a proposed ad hoc standard. Grouping them as proposed in the SAR may result in unintended disconnects within the other standards, and in the worst case result in an ongoing series of iterative SARs.
Response: The intent is not to develop a single standard from the list of standards. The Standards Committee may assign more than one drafting team to develop the standards and when the SAR drafting team asks the Standards Committee for authorization to move the SAR forward to standard drafting, the drafting team may recommend that more than one SDT be assigned to draft the standards. The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards.			
Midwest ISO Stakeholders Standards Collaboration Participants	☑	☑	We agree there is a general need to consolidate where necessary and clean up the standards. However, this SAR covers too large a swath of standards. It very confusing what the overall goal is. Additionally, we are concerned that the range of expertise required by this SAR will result in a drafting team that is too large and will result in little to no progress unless the drafting team is subdivided. If the drafting team is subdivided,

Question #1			
Commenter	**Yes**	**No**	**Comment**
			then this SAR should be subdivided into other SARs.
Response: The SAR was revised to more clearly define the scope of work. The Standards Committee may assign more than one drafting team to develop the standards and when the SAR drafting team asks the Standards Committee for authorization to move the SAR forward to standard drafting, the drafting team may recommend that more than one SDT be assigned to draft the standards. The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards.			
Independent Electricity System Operator	☑	☑	The IESO agrees with the objective but does not agree with the process. There is a general need to clean up the standards and where appropriate consolidate the standards. However, this SAR covers too large a swath of standards, and as a consequence the resulting standard has the potential of being too large for reasoned comments.
Response: The SAR was revised to more clearly define the scope of work. The Standards Committee may assign more than one drafting team to develop the standards and when the SAR drafting team asks the Standards Committee for authorization to move the SAR forward to standard drafting, the drafting team may recommend that more than one SDT be assigned to draft the standards. The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards.			
ITC Transmission	☑		Yes, there is a reliability need to revise the Standards identified in this SAR. Not all of the revisions described, however, are reliability related and in fact should not be included in the standards (e.g., exempting an operator from liability).
Response: The SAR was revised to omit the reference to the liability exemption.			
American Transmission Co.	☑		
Hydro One Networks, Inc. Hydro Québec TransÉnergie	☑		
Salt River Project	☑		
WECC Reliability Coordination Comments Work Group	☑		
PSC of South Carolina	☑		

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Summary Consideration: Most commenters disagreed with the scope of the original SAR and the drafting team made major modifications to reduce the scope of the SAR to only include standards that are already approved and to identify more specifically the range of changes contemplated to the standards that remain in the revised SAR.

Question #2			
Commenter	**Yes**	**No**	**Comment**
Hydro One Networks, Inc. Hydro Québec TransÉnergie		☑	Please see our answer to question No. 3.
Response: Please see the response to question 3.			
ITC		☑	The Standard Drafting Team should not be given lattitude to "include other improvements to the standards deemed appropriate by the drafting team." The purpose of the SAR is to identify the changes contemplated by the need for the Standard Revision. If there are changes that the SAR requestor would like to make to the Standard, they should be spelled out in the SAR. If the SAR requestor does not really know the changes that should be made to the standard, then the SAR should be withdrawn until the need for a SAR can be adequately justified. The remainder of the SAR is very broad; perhaps too broad. The requestor should consider reducing the scope of the SAR to make specific changes to the standards, rather than try to consolidate all of the Standards in one swift stroke.
Response: The intent is not to develop a single standard from the list of standards. The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards. The intent of the *original* SAR was to give the Standard Drafting Team enough latitude to address requirements that fall within a list of performance requirements. Looking to the future, the Standard Drafting Team cannot expand on the scope of its SAR but may develop a set of requirements that is smaller than the scope of the SAR. Based on stakeholder comments, the scope has been revised and is more clearly and more narrowly defined.			
ISO/RTO Council ISO New England		☑	We do agree the standards should be consolidated and redundancies eliminated where appropriate. However, it is not appropriate to include standards in this SAR that have not yet been approved. For example, it is not necessary to expand on the requirement to have facilities in place by adding a testing requirement. If an entity is required to

Question #2			
Commenter	**Yes**	**No**	**Comment**
			have facilities in place and they are not maintained and available, they do not meet the requirement. The "boiler plate" language that this "development may include other improvements deemed appropriate by the drafting team" is too vague and essentially opens the scope to include anything the drafting team wants to do with the standard. This is not appropriate. The scope should be specific and the drafting team should only focus on those specifics. The SRC supports the approach of prioritizing and revising individual standards to FERC's comments as part of the consideration process. Only a few standards should be revised at a time to make the process more manageable.
Response: The SAR was revised to omit all of the standards that were listed in the original SAR but weren't approved (draft IROL Standards and the draft Certification Standards). The SAR was revised to omit the paragraph that referenced facilities. Note that there is a new performance objective in the revised SAR that indicates the resultant standards will have requirements to address the RC's facility capabilities. The intent of the *original* SAR was to give the Standard Drafting Team enough latitude to address requirements that fall within a list of performance requirements. Looking to the future, the Standard Drafting Team cannot expand on the scope of its SAR but may develop a set of requirements that is smaller than the scope of the SAR. Based on stakeholder comments, the scope has been revised and is more clearly and more narrowly defined. The drafting team revised the SAR to omit the 'boiler plate' language. The intent is not to develop a single standard from the list of standards. The SAR DT can recommend that the standards be revised in a specific sequence but the final determination of which standards are revised or developed first is a decision that belongs to the Standards Committee. The Standards Committee may assign more than one drafting team to develop the standards and when the SAR drafting team asks the Standards Committee for authorization to move the SAR forward to standard drafting, the drafting team may recommend that more than one SDT be assigned to draft the standards.			
Midwest ISO Stakeholders Standards Collaboration Participants		☑	We do agree the standards should be consolidated and redundancies eliminated where appropriate. However, it is not appropriate to include standards in this SAR that have not yet been approved. It is not necessary to expand on the requirement to have facilities in place by

Question #2			
Commenter	**Yes**	**No**	**Comment**
			adding a testing requirement. If an entity is required to have facilities in place and they are not maintained and available, they do not meet he requirement of having facilities in place. The "boiler plate" language that this "development may include other improvements deemed appropriate by the drafting team is too vague and essentially opens the scope to include anything the drafting team wants to do with the standard. This is not appropriate. The scope should be specific and the drafting team should only focus on those specifics.
Response: The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards. The SAR was revised to omit the paragraph that referenced facilities. Note that there is a new performance objective in the revised SAR that indicates the resultant standards will have requirements to address the RC's facility capabilities. The intent of the *original* SAR was to give the Standard Drafting Team enough latitude to address requirements that fall within a list of performance requirements. Looking to the future, the Standard Drafting Team cannot expand on the scope of its SAR but may develop a set of requirements that is smaller than the scope of the SAR. Based on stakeholder comments, the scope has been revised and is more clearly and more narrowly defined. The drafting team revised the SAR to omit the 'boiler plate' language.			
American Transmission Co.		☑	ATC agrees with the spirit of the SAR but believes that more details should be provided. Identify which of the redundant requirements will be deleted. Lastly ATC does not understand how a SDT can tackle the ORG -020 – 027 when these standards have not been approved by the board. In other words how can the SDT move forward on the scope when eight of the standards are still in being worked on? To approve the scope of the SAR references to ORG-020 – 027 should be deleted and considered out of bounds for the SDT.
Response: The SAR drafting team will let the standard drafting team determine what requirements will be deleted. The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards.			

Question #2			
Commenter	**Yes**	**No**	**Comment**
Independent Electricity System Operator	☑	☑	We agree with the intent to fill in the gaps and eliminate duplications among standards, and applaud the SDT for taking on this huge and challenging task. We are concerned, however, that the scope itself is too wide but yet not wide enough. Some of the listed standards are still being commented on, for example: IROL-007 to IRO-010, while some others had been commented on but are now in a dormant state, for example: the organization certification standards. These standards are not yet approved, and hence are subject to change and become moving targets for this holistic review task. The scope description does not suggest an approach to deal with ongoing changes to the standards identified. We are concerned that the wide scope and the massive task may not ensure that a one time change will cover all affected standards - those approved and those under development. We suggest the SDT compare this approach to an alternative approach which is to revise a few standards at a time, on a priority basis and considering FERC's views on the status of the standards, thereby limiting the corresponding changes within a more manageable scope. Overtime, when all standards have gone through revisions, all corresponding changes will be duly made.

Response: The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards.

The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards. The SAR was modified to state that the standard drafting team will work with stakeholders to:

- Eliminate redundancy in the requirements.
- Identify requirements that should be moved into other SARs
- Eliminate requirements that do not support bulk power system reliability
- Transfer requirements that need to be in place before an entity begins operation as an RC to certification.
- Fill identified gaps in the requirements for Reliability Coordination

The intent is not to develop a single standard from the list of standards. The SAR DT can recommend that the standards be revised in a specific sequence but the final determination of which standards are revised or developed first is a decision that belongs to the Standards Committee.

Question #2			
Commenter	**Yes**	**No**	**Comment**
The Standards Committee may assign more than one drafting team to develop the standards and when the SAR drafting team asks the Standards Committee for authorization to move the SAR forward to standard drafting, the drafting team may recommend that more than one SDT be assigned to draft the standards.			
WECC Reliability Coordination Comments Work Group	☑		We believe that the drafting needs to verify that requirements exempt the reliability coordinator real-time supervision, as well as the real-time operator from liability when making a good faith effort at preserving reliability.
Response: The drafting team removed the reference to liability from the SAR.			
Salt River Project	☑		
PSC of South Carolina	☑		

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Question #3			
Commenter	**Yes**	**No**	**Comment**
ITC Transmission			Uncertain to say what they would be at this point.
Hydro One Networks, Inc. Hydro Québec TransÉnergie	☑		This project involves the revision of 27 NERC Standards, not a small task by any measure. The extent of the proposed work and the necessary expertise is beyond what can be found in one single SAR team and drafting team. We respectfuly submit that the project be divided into as many SARs and teams as necessary with the work directed and monitored by the Standards Committee.
Response: The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards. The Standards Committee may assign more than one drafting team to develop the standards and when the SAR drafting team asks the Standards Committee for authorization to move the SAR forward to standard drafting, the drafting team may recommend that more than one SDT be assigned to draft the standards.			
Independent Electricity System Operator	☑		There are likely additional standard revisions beyond those identified, but we find it's almost impossible to pre-determine which other standards will be affected as a result of changes to those identified in this SAR. For example, changes currently proposed for IRO-007 to IRO-010 will precipitate corresponding changes to other affected standards, e.g. TOP-003, TOP-005, etc. However, we are unable to provide any specific list of standards that will require corresponding changes not knowing what changes will be made to the standards listed in the SAR. Given the above, it should not be taken for granted that the list is exhaustive in terms of revisions required.
Response: The intent of the *original* SAR was to give the Standard Drafting Team enough latitude to address requirements that fall within a list of performance requirements. Looking to the future, the Standard Drafting Team cannot expand on the scope of its SAR but may develop a set of requirements that is smaller than the scope of the SAR. Based on stakeholder comments, the SAR DT eliminated the paragraph that would have allowed the Standard Drafting Team to expand the scope of activities to address new issues that may come up after the SAR is finalized. If new ideas are identified during standard drafting, the standard drafting team will need to revise its SAR or develop a new SAR to address those additional ideas.			

Question #3			
Commenter	**Yes**	**No**	**Comment**
WECC Reliability Coordination Comments Work Group	☑	☑	The WECC RCCWG believes that the FERC Staff Report suggestion that COM-001 "generation owners missing" should not translate to addition of generation owners in the applicability. "Generator Operator" is an applicable entity, but not "Generator Owner". The WECC RCCWG believes the Reliability Coordination SAR should address those V0 comments on requirements, when those specific are no longer part of the standard referenced in the V0 comments identified in Attachment 1 of the SAR if those comments were not previously addressed. One example: posted "V0 Industry Comments" suggest inclusion of sabotage and security in R2 of COM-002. That comment is no longer applicable to COM-002 R2 - the standard requirements have changed. That said, the comment intent should not be lost
Response: The FERC comments are 'issues to consider' but are not directives for changes to the standards. The SAR was revised and any outdated V0 comments (or other organization or committee comments) comments have been removed.			
Midwest ISO Stakeholders Standards Collaboration Participants	☑	☑	Because of the overbroad nature of this SAR, the answer is likely yes. However, it is nearly impossible to determine all the additional required changes without missing important items. This SAR needs to be broken down to address individual standards.
Response: The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards. The list of standards included in the scope of this SAR has been reduced to eliminate standards that will already be addressed by the IROL SDT and to eliminate the list of proposed certification standards. The SAR was modified to state that the standard drafting team will work with stakeholders to: - Eliminate redundancy in the requirements. - Identify requirements that should be moved into other SARs - Eliminate requirements that do not support bulk power system reliability - Transfer requirements that need to be in place before an entity begins operation as an RC to certification. - Fill identified gaps in the requirements for Reliability Coordination			
ISO/RTO Council ISO New England		☑	
American Transmission Co.		☑	

Question #3			
Commenter	**Yes**	**No**	**Comment**
Salt River Project		☑	
PSC of South Carolina		☑	