

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Thad K. Ness	
Organization:	American Electric Power (AEP)	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> <b>RFC</b>	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

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**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments:

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: We disagree with this statement. Just what does the SAR DT consider to be a true BES reliability issue? The team's opinion seems contradictory to NERC's efforts to have the Regions agree that all non-radial transmission facilities 100 kV and above are Bulk Electric System facilities. On one end of the spectrum there is a NERC effort to expand the definition and size of BES. Then you efforts like this SAR to reduce the size and scope.

While the most severe and significant BES reliability issue may be IROL violations (IROL violations can lead to instability, uncontrolled separation, or cascading outages), that surely is not the only reliability issue. Multiple SOL events can lead to a situation where you have a new, non-studied IROL. Should we not operate the system such to prevent us from entering or approaching IROL limits? If the only limits that have applicable Reliability Standards is IROLs, then are we not setting up the system to approach the “edge of the cliff” before we take appropriate defensive action? While we agree not all SOLs have a significant impact on the overall reliability of the BES, we do not agree that means all requirements related to SOLs should be removed from the NERC Standards. That would be a move towards less reliability in the future, not a step towards improving reliability.

And just what is meant by local utility operations not being a true BES reliability issue. If the system is not operated to respect SOLs, then that could jeopardize a firm power purchase from a distance resource via firm transmission service that a “local utility” is relying upon. Loss of that firm power purchase, could lead to having to shed customer load? Why is that not a BES reliability issue? Isn't that one of the reasons the BES exists is to support such commerce? Violating SOLs could also result in the tripping of generation outlets, resulting in loss of generation. That too is not a BES reliability issue? Before we could support removing requirements related to SOLs, the SAR DT

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team would need to provide a definition of what exactly is considered a BES reliability issue.

Most of the TLRs that are implemented today are for relieving SOLs not IROLs. Therefore, removing requirements related to SOLs would be in direct conflict with current practices and does not improve the reliability practices from what we have today. At a minimum, RCs and TOPs need to monitor and know the EHV system SOLs and ensure operation within those SOLs and to monitor and operate to other SOLs as specified in the agreements between the RC and TOPs and BAs (see ORG-021-1 R3).

While it is not practical or necessary to ticket every car speeding on the freeway, on the contrary it is also not practical or necessary to remove the speedometer from the cars. We feel that the requirements for the SOL are like the speedometers; therefore, removing requirements related to SOLs is inappropriate and could lead to less reliable operations.

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

Yes

No

Comments: Yes, we agree that the Standard Drafting Team should review and consider the merits of those comments and incorporate those comments that make sense and our complimentary to maintaining and improving reliable operations into the revised Standards.

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: We agree with the purpose stated for this SAR. We do not agree with all of the specific changes suggested in the SAR. However, the SAR is written that the Standard Drafting Team is to consider the changes, which we do support. We believe that through a thorough debate and analysis by the Standard Drafting Team, that they too will conclude that not all the recommendations should be implemented.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: AEP encourages additional aids (i.e. whitepapers and/or teleconferences) during the drafting process to better understand the drive for removing SOLs from some of the standards.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jeff Hackman	
Organization:	Ameren	
Telephone:	314-554-2839	
E-mail:	jhackman@ameren.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



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- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

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You do not have to answer all questions. *Insert a "check" mark in the appropriate boxes by clicking the gray areas.*

1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments:

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments:

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: It is important that the standards address those things, and only those things, that affect the reliability of the BES so that time and attention are not diverted from the most worthwhile initiatives.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Co.	
Telephone:	262 506 6885	
E-mail:	jshaver@atcllc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
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- TOP-001-1 Reliability Responsibilities and Authorities
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The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

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**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Standards define “good utility practices” therefore it’s our opinion that these requirements should remain.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: ATC does not agree with SAR DT that SOLs are only important to local operations and that they should be removed from these standards. If SOLs are removed from NERC standards then any real-time identifications of an SOL that becomes an IROL will be difficult if not impossible to determine.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: Comments submitted during the comment period should be given a greater weight in the creation of new standards. Comments submitted to other groups and different efforts are specific to those initiatives and the inclusion in this effort should be limited.

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

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5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: ATC agrees that there is a reliability-related need to review and revise this set of standards, but we do not agree with the overly prescriptive changes appearing in the SAR.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: The scope of this SAR is overly prescriptive in that it has already determined a solution to the perceived deficiency. A scope needs to be detailed enough to provide a solid base for discussion and review, but not so detailed that the solution has been identified. The solution will be developed by the SDT along with industry feedback. ATC believes that this SAR is overly prescriptive and should be re-written.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: Comment in the SAR:

"R14 and R15 apply to the Generator Operator and as such do not belong in the TOP standards. The drafting team should look to find another place for these requirements if possible."

ATC disagree with this statement. The "Purpose" statement sets the need for the standard. All entities that are needed to support the "Purpose" should be identified in the Applicability section. The label of TOP should not be the justification to exclude any entity that is not a Transmission Operator.

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Anthony Alford	
Organization:	CenterPoint Energy	
Telephone:	713-207-2265	
E-mail:	anthony.alford@centerpointenergy.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

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Comments:

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments:

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: CenterPoint Energy disagrees with the suggestion to remove the real and reactive capability verification testing from TOP-002-2, R13. The capability of a generator must be periodically tested to ensure that the machine will perform to its limits. Additional language should be added such that these tests are conducted on a periodic basis and not just at the requests of a BA or TOP.

CenterPoint Energy believes that the requirements of TOP-002-2, R14 and R15 do belong in the Transmission Operations Standards as those variables will have a direct impact on daily operations. Any additional details or clarification can be added to other standards if necessary.

4. **Are there any standards included in the SAR that shouldn't be included?**

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**5. Are there standards that should be added to the SAR?**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

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Regional Variances

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowlan@duke-energy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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You do not have to answer all questions. *Insert a "check" mark in the appropriate boxes by clicking the gray areas.*

1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Where the identification of procedures and good utility practice bring clarity to TOP requirements, they should be retained, although not as separate requirements.

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments: Where SOLs impact the Bulk Electric System, they are a reliability issue and should not be moved into guides or other reference documents.

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: Comments submitted should certainly be considered by the standard drafting team, but the standard drafting team should not be bound to incorporate all comments into the revised standards.

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed: COM-001-1, COM-002-2 and PER-001-0. See response to question 7.

5. **Are there standards that should be added to the SAR?**

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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The following standards should be added to the SAR: None

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: The reliability-related need is to provide clarity and remove redundancy.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: This SAR should focus only on TOP standards.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments: None

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: If the ultimate goal is to eliminate PER-001-0 as stated on page SAR-4, it should be noted that responsibility and authority are to be provided to "operating personnel" in either a TO or a BA. However, in standard TOP-001 Requirement 1, it deals specifically with Transmission Operators, and Balancing Authority personnel are not covered under this standard. Consideration should be given to either add BAs to TOP-001 R1 or they should be given "responsibility and authority" in some other standard if PER-001 is eliminated.

Also, NERC should create a companion database for the standards that links each requirement, its compliance elements and applicable entities. Such a cross-reference would facilitate standards actions dealing with groups of standards.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ed Davis	
Organization:	Entergy Services	
Telephone:	504-576-3029	
E-mail:	edavis@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

You do not have to answer all questions. *Insert a "check" mark in the appropriate boxes by clicking the gray areas.*

1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments:

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments:

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

No.

5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.



**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Will Franklin	
Organization:	Entergy Services, Inc (Generation/System Planning & Operations)	
Telephone:	281-297-394	
E-mail:	wfrankl@entergy.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

You do not have to answer all questions. *Insert a "check" mark in the appropriate boxes by clicking the gray areas.*

1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Move to reference documents or eliminate 'good practices' from standards, and also eliminate redundant requirements.

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments:

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

We agree that the proposed changes need to be evaluated. However, it is important that the revised standards are balloted separately so that the entire set is not rejected because of an issue with one of the standards nor approved as a set with flaws or concerns in one or more of the standards.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	H. Steven (Steve) Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
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- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

You do not have to answer all questions. *Insert a "check" mark in the appropriate boxes by clicking the gray areas.*

1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Such information is of value and should not be lost, but does not belong in a Standard. A Standard must apply continent-wide and not be of the nature of dictating any particular practice or procedure.

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments: There may be some confusion across the industry about "what are SOLs". I think there is good agreement that IROLs are applicable at the NERC Standard level, but there is some identifiable reluctance within the industry to say that there is no place at all for SOLs in the NERC Standards. At the very least, there needs to be a good definition of SOL (which I believe there is), but some are concerned with the idea that IROLs are a "subset" of SOLs. Some believe that once a differentiation is made, the two should be considered separately and have separate requirements. I personally believe that IROLs are a subset of SOLs. I further believe that routine planning, operations planning, and real-time operations should be addressing all SOLs. Only during real-time operations or, more accurately, fresh post-analysis, can it be fully determined that an SOL may have sufficient consequences associated with it to qualify it as an IROL. If an IROL can be identified in advance, since by definition it relates to a single contingency, I believe a case could be made that planning and operations planning requirements have not been satisfied. In the great majority of cases, a system may be driven into an IROL through a series of unplanned events such that the system indeed may be subject to undesirable results from a "next" single contingency. However, prudent operations should dictate that no system plan to be in such a state.

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

Yes

No

Comments: Each submitted comment containing technical content deserves to be given equal review by the Standard Drafting Team (SDT) once a SAR has been approved and a SDT has been selected.

**4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: I believe that revising the set of standards for clarity and for reducing redundancy will benefit reliability by reducing confusion. There is also a common sense reason to revise them to avoid "multiple jeopardy" by exposure to the same requirement in multiple standards.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Doug Hohlbaugh	
Organization:	FirstEnergy	
Telephone:	330-384-4698	
E-mail:	hohlbaughdg@firstenergycorp.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: FirstEnergy agrees in general that Good Utility Practices in and of themselves do not belong in the standards. However, for the two examples cited we believe these are important processes for ensuring a reliable electric system and therefore should remain within the reliability standards. Exclusion of requirements based on Good Utility Practices will need to be evaluated and addressed on a case by case basis and commented on via the standard drafting process.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: The reliability standards governing real-time operations should be focused on the subset of SOLs that qualify as IROLs.(reference FAC-010-1 R1.3). Blanket removal of all SOL references should be avoided and will need to be done on a case by case basis.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you are aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Subjective commentary that is not measurable or enforceable should be removed from the standards and placed in the Reliability Readiness Evaluation and Improvement Program Reference Manual or something similar.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: SOLs are a critical part operational situational awareness and of a “defense-in-depth” approach to operating reliably. It is critical for the Transmission Operator and Reliability Coordinator to be aware of areas that are stressed within his/her TOP and RC area (local and wide area view). Advance knowledge of what may initially be local or even minor issues to the BES, will allow the development of the most effective and appropriate solutions for resolving the SOLs and ensuring that they DO NOT evolve into IROLs.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: Not sure what the question is but, Yes capturing previous analysis regarding standard content and including in this SAR and subsequent standard revisions is appropriate and effective use of previous NERC groups efforts.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: The revisions being made under this SAR should be well coordinated with the revisions being made under the Reliability Coordination SAR (Project 2006-06). Both SARs are seeking to revise COM-001 and COM-002. It is also critical that language proposed in the revisions of both projects be well coordinated because of the interrelated nature of the applicable standards.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Roger Champagne	
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Telephone:	514 289-2211, X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: We agree that good utility practice and procedures should not be included in standards. However, care should be taken not to remove coordination requirements which are in fact necessary to reliability planning and operation.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: We strongly disagree with this idea. Respecting SOLs is a fundamental operational requirement. Transmission Operators must be required to closely monitor their area; failing to do so may ultimately lead to cascading failures, as was witnessed on August 14, 2003. An SOLs, left unchecked, will become an IROL, which is why it is imperative that all SOLs be monitored and respected at the TOP level.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: This may be a reasonable approach. However, the SAR DT may want to consider if they then need to pass all comments dealing specifically with the standards on to the Standards Drafting team from this process.

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Some of the standards included in this SAR for revision appear to create a conflict with other ongoing SAR and Standard drafting activities. We are becoming more and more concerned about the parallel changes taking place.

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: Please see response to Q#4.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

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---

You do not have to answer all questions. *Insert a “check” mark in the appropriate boxes by clicking the gray areas.*

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: We concur that good utility practices and administrative procedures should not be included in standards. Nonetheless, we suggest the SDT to assess which of the existing requirements, including the procedural ones, are indeed actions needed to preserve reliability and hence keep them in the standards.

While we agree that TOP-002-2, R2 may be removed, we do not agree that TOP-001-1 R7 should be removed since the notification and coordination of generation and transmission outages are necessary to ensure that reliability impact of the planned removal of the BES facility is assessed. It is not an administrative procedure or good utility practice; it is a reliability requirement.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: We strongly disagree with this notion. Respecting SOLs and mitigating their violations are fundamental to the reliable operation of the transmission operator's area which may ultimately affect the interconnected system. And since IROLs are a subset of SOLs, and that some SOLs may become IROLs as system condition changes, it is imperative that all SOLs be monitored and observed at all time.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: This seems to be a reasonable approach. However, the SDT should take these into consideration only when reviewing and revising the standards, and use its

## **Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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judgment on their individual merit rather than taking them as given mandates or directives.

### **4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

(i) We do not understand the basis to include COM-001-1, COM-002-1 and EOP-001-0 in this SAR. While there are requirements in these standards that reference TOPs, there are other standards that also reference TOPs but they are not included in this set.

(ii) Some of the standards included in this SAR for revision appear to create a coordination need or potential conflicts with other SARs and draft standards:

(a) The Operating Personnel Communications Protocol (OPCP) SAR is proposing to modify COM-001-1, COM-002-1, TOP-001-1, TOP-002-2, TOP-007-0 and TOP-008-1. How does this SAR Drafting Team propose to coordinate with the OPCS SAR drafting team to avoid either duplicated work effort or making changes to these standards while the draft set proposed by the other SDT are being commented or balloted? It seems like this would be difficult to accomplish and that one SAR should be delayed.

(b) The Operate within Interconnected Operating Limits SDT is in the process of modifying the TOP-003, TOP-005, and TOP-006 standards as a result of changes to IRO-007-1 to IRO-011-1 standards. The coordination issues as indicated above would also need to be considered. We suggest that drafting of the standards included in this SAR be put on hold until after the IRO standards are balloted and approved.

(c) The Reliability-based Control SAR, which will develop the BAL-007 to BAL-011, standards is posted for comments. The coordination issues as indicated above would also need to be considered. We suggest that drafting of the standards included in this SAR be put on hold until after the BAL standards are balloted and approved.

(d) Finally, the System Personnel Training drafting team is proposing to eliminate PER-001 through PER-004. This SAR would have to be updated to reflect those changes. Again this SAR should be put on hold until the PER standards are balloted.

### **5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: Please see our comments under Q2 and Q4 regarding the notion of the SAR DT, and the potential conflicts with other efforts currently underway or to start soon.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

Specific to the proposed changes to the standards, we offer the following comments:

TOP-001

R2: the SDT suggests to remove this requirement. However, R2 holds TOP responsible for taking immediate actions to alleviate operating emergencies which may be within the TOP area and not monitored by an RC, whereas R3 requires several operating entities to comply with the RC directives. The two requirements serve different purposes.

R8: the SDT suggests to delete this requirement. We suggest the SDT to exercise caution and compare this requirement (restoring the system during an emergency) with other related standards to ensure that this is indeed covered elsewhere.

TOP-002

R1: the SDT suggests to remove this as it is redundant with TOP-008-1 R1. Please note that TOP-002 R1 requires plans whereas TOP-008 R1 requires TOP to take action in real time. These requirements are different. If the SDT wants to revise TOP-002 R1 to eliminate vague requirements, we suggest that the second sentence "In addition, each Balancing Authority and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained." be deleted.

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R3: the SDT suggests deleting R3 as it is redundant with TOP-004-1 R1. We disagree with this proposal. R3 requires the various operating entities to coordinate and develop operational plans; whereas TOP-004-1 requires the TOP to operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs). They are required for different time frames and purposes.

R4: the SDT suggests deleting R4 as it is redundant with IRO-005-2, R9. We Disagree with this proposal. Deleting R4 would remove the obligation for BA and Top to coordinate their activities with the RC. Additionally, the two requirements serve different purposes: R4 in TOP-002 serves to ensure that normal Interconnection operation will proceed in an orderly and consistent manner; whereas R9 in IRO-005-2 serves to require the RC to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations.

R6: the SDT suggests deleting R6 as it is redundant with BAL-002-0 R4 and IRO-005-2 R9. We agree that there is redundancy with BAL-002-0 R4, but we not agree that it is redundant with IRO-005-2 R9. Deleting R6 would remove the obligation for BA and Top to coordinate their activities with the RC. Additionally, the two requirements serve different purposes: R6 in TOP-002 require TOP and BA to plan for contingencies; whereas R9 in IRO-005-2 serves to require the RC to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations.

R7 and R9: the SDT suggests deleting these requirements as they are redundant with BAL-007 through -011. We do not agree with the deletion of both requirements, due to the fact the standards BAL-007 to BAL-011 have failed the ballot process, and are now part of the Reliability-based Control SAR which is posted for comments. Please see our comments on Q4 (ii), above.

R8, R10 and R11: the SDT suggests deleting these requirements as they are redundant with IRO-005-2 R9. We agree with this deletion provided that R4 is retained. Otherwise, R10 and R11 should be retained.

R18: the SDT suggests to move this to FAC-009-1. We do not agree since the purpose of FAC-009-1 is "To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or Methodologies". We veiw that R18 crosses a number of Standards so there may be a better home than FAC-009-1.

TOP-003-0

R3: the SDT suggests deleting R1.3 as it is redundant with IRO-010, R3 as part of the over-all data specification effort. We believe the referenced requirement should be R4.

TOP-004-0

R1: the SDT suggests deleting R1 as it is redundant with IRO-009-1, R4. We disagree with this. SAR IRO-009-1 holds the RC responsible for operated within IROL. We feel strongly that the TOP must also operate its system to respect IROL. Further, we need to defer any changes to remove or modify SOL until after the definition of Adequate Level of reliability is defined. We also provided other reasons for retaining it. Please see our comments on Q2, above.

## **Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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R2: the SDT suggests deleting R2 as it is simply the definition of an IROL and is redundant with FAC-010-1 and FAC-011-1. We disagree with this proposal since R2 requires TOP to operate so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single contingency. FAC-010-1 and FAC-011-1 deal with the methodology to determine SOL and IROL. They hold different entities for doing very different things altogether.

R3: We disagree with removing this requirement for the above same reason.

TOP-005-1

R2: the SDT suggests deleting this requirement. We agree that R2 is not a reliability requirement, but the SDT needs to recommend a home for entities that receive data from the ISN that it must sign the NERC Confidentiality Agreement for "Electric System Reliability Data".

TOP-006-1

R1: the SDT suggests deleting R1 as it is redundant with FAC-009-1, R2. We disagree with this proposal since R1 deals with real-time data such as facility status, resource availability; whereas FAC-009-1 deals with establishing ratings.

R4: the SDT suggests deleting R4 as it is redundant with BAL-001 and -002 and is also addressed in IRO-010-1, R1 and R3. We disagree as R4 requires the operating entities to do things that are very different from any of BAL-001, BAL-002 and IRO-010-1.

R7: the SDT considers deleting Balancing Authority as it is covered in BAL-005-0, R8 and deleting Reliability Coordinator as it is covered in BAL-008-1, R1. We do not agree with both. In the first case, the requirements for the BA in R7 is to monitor system frequency which is different than those in BAL-005-0, R8 which specify the data and metering requirements. In the second case, BAL-008 doesn't yet exist (failed ballot).

TOP-008

R3: the SDT suggests deleting R3 as it is a local utility risk consideration and not a reliability issue as currently worded. We do not agree with the deletion since the requirement implies that the action taken by the TOP has interconnected system implication.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Good utility practices and procedures should not be included in standards. They are vague statements and do not belong in the standards even as a reference. If good utility practice statements were acceptable there would only be a need for one requirement and that is that all entities shall institute good utility practice. True standards need to be developed and superfluous information should not remain in the standards.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments:

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: This may be a reasonable approach. However, the SAR DT may want to consider if they then need to pass all comments dealing specifically with the standards on to the Standards Drafting team from this process.

- 4. Are there any standards included in the SAR that shouldn't be included?**

## **Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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The following standards were included in the SAR and should be removed: We do agree that this SAR appears to cover the right set of standards. However, it potentially conflicts with other SARs and draft standards.

The Operating Personnel Communications Protocol (OPCP) SAR is proposing to modify COM-1-1, COM-002-2, TOP-001-1, TOP-002-2, TOP-007-0, TOP-008-0 standards. All of these standards are proposed to be modified in this SAR. How does this SAR Drafting Team propose to coordinate with the OPCS SAR drafting team. It seems like this would be difficult to accomplish and that one SAR should be delayed.

The Operate within Interconnected Operating Limits Standard Drafting team is in the process of modifying the TOP-003, TOP-005, and TOP-006 standards. Assuming these standards are eventually approved, this SAR will have to be modified to reflect the new versions of the standards. Again, this SAR should be delayed until the Operate within Interconnected Operating Limits Standards have completed the ballot process.

Finally, System Personnel Training drafting team is proposing to eliminate PER-001 through PER-004. This SAR would have to be updated to reflect those changes. Again this SAR should be delayed until these standards are balloted.

### **5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: This SAR should be written to apply only to TOPs. This is an opportunity to create a good quality set of standards and eliminate the existing ambiguous requirements. You should start with a clean slate.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: The SAR proposes to add the language "without delay" to a number of requirements. We are concerned that this wording could be interpreted in a standard to require the need for immediate control action. We propose that the standard drafting team should clarify that the "without delay" language does not require immediate control action but requires the applicable entity to begin evaluations necessary to take control actions. These evaluations may include but are not limited to verifying the limit, measurement, or performing a on-line power flow study.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: We agree that good utility practice and procedures should not be included in standards. However, care should be taken not to remove coordination requirements which are in fact necessary to reliability planning and operation.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: We strongly disagree with this idea. Respecting SOLs is a fundamental operational requirement. Transmission Operators must be required to closely monitor their area; failing to do so may ultimately lead to cascading failures, as was witnessed on August 14. SOLs, left unchecked, will become an IROL, which is why it is imperative that all SOLs be monitored and respected at the TOP level.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: This may be a reasonable approach. However, the SAR DT may want to consider if they then need to pass all comments dealing specifically with the standards on to the Standards Drafting team from this process.

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Some of the standards included in this SAR for revision appear to create a conflict with other ongoing SAR and Standard drafting activities. We are becoming more and more concerned about the parallel changes taking place.

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: Please see response to Q#4.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: ISO New England supports Quebec's proposal not to be subjected to BAAL-007-1 requirements because of their single BA Interconnection status.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Brian Thumm	
Organization:	ITC Holdings	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
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- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments:

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: While SOLs may be local in nature, the mitigation of SOL violations has the potential to impact several entities of the functional model - oftentimes from different companies. Without a standard, it will be difficult to properly justify actions taken to mitigate SOL violations.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

- 5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:



**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: Except for not addressing the SOL issue described above.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Michelle Rheault	
Organization:	Manitoba Hydro	
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E-mail:	mdrheault@hydro.mb.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a "check" mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: If the "procedures and good utility practice" are enforceable, the above requirements should remain in the standards. If these requirements are removed from the standard, where will the reference documents be located? An attachment to the Standard or a separate manual not quickly and easily accessible to those who need it?

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments: If the "procedures and good utility practice" are enforceable, the above requirements should remain in the standards. If these requirements are removed from the standard, where will the reference documents be located? An attachment to the Standard or a separate manual not quickly and easily accessible to those who need it?

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

- 5. Are there standards that should be added to the SAR?**

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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The following standards should be added to the SAR:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: The standards must be revised to clearly define the responsible entity for each requirement. There can't be any room for a requirement to fall through the cracks because the assignment of responsibility is not clear. Redundancy between Standards does not mitigate the risk of inadequate assignment of responsibility, but rather it may increase the likelihood that responsible entities assume that the requirements are met by others.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments:

Specific to COM-001-1 Telecommunications:

In general, we support the proposed revisions to this standard with the following exceptions.

Periodicity and type of testing should not be defined explicitly in the standard. The onus must be placed on each organization to determine the periodicity and testing requirements as necessary to meet expected performance criteria. Such requirements would require regular review and adjustment to address changing conditions.

Appendix B - FERC Order 693: We are concerned that the proposed expansion of the Standard to include Generator Operators and Distribution Providers is unachievable within a reasonable period of time relative to ongoing efforts to comply with current standards. i.e. - too much too fast.

Specific to TOP-005 Operational Reliability Information

If the proposed changes are adopted, only one requirement R3 remains in this standard. This requirement involves Balancing Authorities ( BAs ) and Transmission Operators ( TOs ) supplying on-line information to associated BAs and TOs for reliability

## **Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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assessments and coordinated operations. This same information is also transmitted to the Reliability Coordinators ( RCs ) via requirement R1. (which is now to be transferred to and covered by IRO-010-1 ).

If the RCs are receiving all the required reliability data anyway, why can't all concerned BAs and TOs get this same data from the RCs instead of directly from the concerned utility? Won't all BAs and TOs be required to send reliability data the closest RCs, even if they are not already a direct or associate member of any established RC?

Keeping TOP-005 only for R3 opens the door to potential reliability analysis and data being developed and transmitted between interconnected BAs and TOs that is NOT also transmitted to RCs. It may be better to make TOP-005 R3. part of another standard ( such as IRO-010 ) to ensure RCs are properly informed, and then eliminate TOP-005 altogether.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:** NSRS  
**Lead Contact:** Ken Goldsmith  
**Contact Organization:** MRO  
**Contact Segment:** 10  
**Contact Telephone:** 319-786-4167  
**Contact E-mail:** kengoldsmith@alliantenergy.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Eric Ruskamp	Lincoln Electric System	MRO	10
Joe Knight	Great River Energy	MRO	10
Terry Bilke	MISO	MRO	10
Mike Brytowski	Midwest Reliability Organization	MRO	10
David Rudolph	Basin Electric Power Cooperative	MRO	10
Pamela Oreschnick	Xcel Energy	MRO	10
Robert Coish	Manitoba Hydro	MRO	10
Neal Balu	WPSR	MRO	10
Al Boesch	NPPD	MRO	10
Carol Gerou	Minnesota Power	MRO	10
Jim Haigh	WAPA	MRO	10
Todd Gosnel	OPPD	MRO	10
27 additional MRO members	Not named above	MRO	10

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

---

### Background Information

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- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
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- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
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- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: While we agree that the procedures and good utility practices do not necessarily need to be in the standard itself, the reference documents must be issued concurrent with the implementation of the revised standard. There is a great deal of information that is very useful for the utilities implementing the standards.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: A System Operating Limit (SOL) does not necessarily need to be included in the standard itself, but the literature on Good Utility Practice must be issued concurrent with the implementation of the revised standard. There is a great deal of information that is very useful for the utilities implementing the standards.

To aid understanding of a System Operating Limit (SOL), it would be very helpful to add some examples of a SOL in the Glossary of Terms.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

- 4. Are there any standards included in the SAR that shouldn't be included?**

## **Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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The following standards were included in the SAR and should be removed: There are several TOP standards currently under revision in other SAR's. There must be clear coordination between the Drafting Teams of the various SAR's as they are revising the Reliability Standards.

### **5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: The current versions of the standards are very voluminous and confusing. These revisions should remove the ambiguity and lead to a small set of quality reliability related requirements to be complied with.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: The current versions of the standards are very voluminous and confusing. These revisions should remove the ambiguity and lead to a small set of quality reliability related requirements to be complied with.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments: We are not aware of any at this time, since we do not know the detailed changes and wording that will be in the Reliability Standards. It is imperative to include red-line versions of the revised standards to allow determination of what needs to be included in the reference documents.

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: As the standards are revised, it is necessary to insure there is, at a minimum, one measurement for each requirement. If a measure can not be determined for a requirement, the requirement should be rewritten or deleted.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	James Castle	
Organization:	New York Independent System Operator	
Telephone:	518-356-6244	
E-mail:	jcastle@nyiso.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: Each case should be reviewed on an individual basis. It was not clear in the examples you provided. It is possible that some procedures may need to be reworded into standard language and for others it may be appropriate to move to a reference document.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: SOLs should be retained as part of the NERC Standards. The NYISO does not believe that SOLs are only important to local operations. SOLs also occur on BPS facilities and can cause reliability issues outside of the local utility operations, without being an IROL.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: This may be a reasonable approach. The NYISO would recommend that all subsequent comments be provided to the Standards Drafting Team for consideration in revising the standards.

- 4. Are there any standards included in the SAR that shouldn't be included?**

## **Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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The following standards were included in the SAR and should be removed: We do agree that this SAR appears to cover the right set of standards. However, it potentially conflicts with other SARs and draft standards.

The Operating Personnel Communications Protocol (OPCP) SAR is proposing to modify COM-1-1, COM-002-2, TOP-001-1, TOP-002-2, TOP-007-0, TOP-008-0 standards. All of these standards are proposed to be modified in this SAR. How does this SAR Drafting Team propose to coordinate with the OPCS SAR drafting team. It seems like this would be difficult to accomplish and that one SAR should be delayed.

The Operate within Interconnected Operating Limits Standard Drafting team is in the process of modifying the TOP-003, TOP-005, and TOP-006 standards. Assuming these standards are eventually approved, this SAR will have to be modified to reflect the new versions of the standards. Again, this SAR should be delayed until the Operate within Interconnected Operating Limits Standards have completed the ballot process.

Finally, System Personnel Training drafting team is proposing to eliminate PER-001 through PER-004. This SAR would have to be updated to reflect those changes. Again this SAR should be delayed until these standards are balloted.

### **5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: The SAR proposes to add the language "without delay" to a number of requirements. We are concerned that this wording could be interpreted in a standard to require the need for immediate control action. We propose that the standard drafting team should clarify that the "without delay" language does not require immediate control action but requires the applicable entity to begin evaluations necessary to take control actions. These evaluations may include but are not limited to verifying the limit, measurement, or performing a on-line power flow study.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: We agree that good utility practice and procedures should not be included in standards. However, care should be taken not to remove coordination requirements which are in fact necessary to reliability planning and operation.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: We strongly disagree with this idea. Respecting SOLs is a fundamental operational requirement. Transmission Operators must be required to closely monitor their area; failing to do so may ultimately lead to cascading failures, as was witnessed on August 14. An SOLs, left unchecked, will become an IROL, which is why it is imperative that all SOLs be monitored and respected at the TOP level.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: This may be a reasonable approach. However, the SAR DT may want to consider if they then need to pass all comments dealing specifically with the standards on to the Standards Drafting team from this process.

- 4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Some of the standards included in this SAR for revision appear to create a conflict with other ongoing SAR and Standard drafting activities. We are becoming more and more concerned about the parallel changes taking place.

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: No.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: Please see response to Q#4.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: HQT(Quebec) wishes to proposed that the Province of Quebec not be subjected to BAAL-007-1 requirements and so not be subject to compliance to that standard. Since Quebec is a single BA Interconnection, BAAL-007 is not relevant. For Quebec, BAAL-008 is the Standard that is more relevant for reliable operation.

Quebec proposes to follow the rest of BAAL-008 to BAAL-011 and would be willing to participate in the field test for those Standards.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
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- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

You do not have to answer all questions. *Insert a "check" mark in the appropriate boxes by clicking the gray areas.*

1. **The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments:

2. **The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on "good utility practice." Do you agree?**

- Yes  
 No

Comments:

3. **The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments:

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed: None

5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: None

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments: None

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: None

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

**You do not have to answer all questions. Insert a “check” mark in the appropriate boxes by clicking the gray areas.**

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments:

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: There are many Standard requirements outside the scope of this SAR which require the RC to “monitor” potential SOLs.

As an example, IRO-003, R1 says each Reliability Coordinator shall monitor all Bulk Electric System facilities to ensure the RC is able to determine any potential System Operating Limit. If this SAR removes the standards in scope that mention SOLs but leaves IRO-003, R1, to be enforced, then ambiguity will result.

IRO-003, R2 says each Reliability Coordinator shall know the current status of all critical facilities whose failure, degradation or disconnection could result in an SOL. Again, it appears in other standards (outside the scope of this SAR) that the RC is responsible (enforceable requirement) for being aware of preliminary events that could lead to an SOL.

Additionally, IRO-002, R6 also contains such references to SOLs as well as other IRO Standards. Therefore, it appears the scope of the SAR should be broadened to include other standard requirements not contained in this SAR.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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Yes

No

Comments: This SAR does not provide the referenced assessments the SAR drafting team has made on comments contained in Appendix B. Therefore, we can not agree or disagree with the team's assessment.

**4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed:

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: IRO-002, IRO-003, IRO-005, IRO-006. However, there could be others.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments: The SAR needs to be broadened in scope to cover all standard requirements that contain references of the RC being responsible for SOLs and not just a subset of standards.

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: It is recommended that the drafting team members review all alleged duplications closely to be sure that the true meaning of the duplicated statement is the same as the original statement before being deleted. There could be instances where the words are the same but the meaning behind the duplication could be different.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Alan Gale	
Organization:	City of Tallahassee (TAL)	
Telephone:	(850) 891-3025	
E-mail:	galea@talgov.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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## Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation

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### Background Information

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- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

You do not have to answer all questions. *Insert a “check” mark in the appropriate boxes by clicking the gray areas.*

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: I am all for removing items that are "not standards" from the standards. However, references can be hard to keep track of. And they will "creep" into standard via the Readiness Assessment process.

Each "requirement" up for deletion should be reviewed individually. Even the SAR drafting team disagrees on them. The example cited above (TOP-001-1, R7) is slated for revision in the Detailed Description portion of the SAR itself. The TOP-002-2, R2 should be removed.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments:

- Without a standard requiring action on SOL's, many entities will live with them in the hope that nothing else will happen.
- If you make the RC aware of small problems (SOL), they can be corrected before they are big problems (IROL).
- The determination of whether an SOL is an IROL is made by the RC. If there is no notification, how can he make that determination?
- Some coordination of SOL remediation may need to occur between entities. The corrective action I want to take may put my neighbor in extremis. The coordination is best done while keeping the RC informed.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team's assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes

**Comment Form — Project 2007-03 — SAR for Real-time Transmission Operations & Balancing of Load and Generation**

---

No

Comments:

4. **Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed: None

5. **Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: None

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments:

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments: None

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: None

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Please use this form to submit comments on the proposed Real-time Transmission Operations and Balancing of Load and Generation SAR. Comments must be submitted by **June 13, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Real-time TOP & BA" in the subject line. If you have questions please contact Ed Dobrowolski at 609-947-3673 or [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net)

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



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### Background Information

The Real-time SAR for Transmission Operations and Balancing of Load and Generation includes revising the following standards:

- COM-001-1 Telecommunications
- COM-002-2 Communications and Coordination
- TOP-001-1 Reliability Responsibilities and Authorities
- TOP-002-2 Normal Operations Planning
- TOP-003-0 Planned Outage Coordination
- TOP-004-1 Transmission Operations
- TOP-005-1 Operational Reliability Information
- TOP-006-1 Monitoring System Conditions
- TOP-007-0 Reporting Sol and IROL Violations
- TOP-008-0 Response to Transmission Violations
- PER-001-0 Operating Personnel Responsibility and Authority

The purpose of revising these standards is to:

1. Clarify requirements for real-time operations of the Bulk Electric System in the cited standards.
2. Consider stakeholder comments received during the initial development of the standards and other comments received from ERO regulatory authorities as noted in Appendix B.
3. Consider other general improvements as described in Appendix A.
4. This satisfies the ANSI procedure requirement for five-year review of the standards.

Please review the SAR and then submit your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **June 13, 2007** with the words "**Real-time TOP & BA**" in the subject line.

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You do not have to answer all questions. *Insert a “check” mark in the appropriate boxes by clicking the gray areas.*

- 1. The TOP standards seem to refer in many places to procedures and good utility practice as opposed to true standards. (See TOP-001-1, R7 and TOP-002-2, R2.) Should these items remain as standard requirements or should procedures and good utility practices be removed from the standards and be placed into reference documents?**

- Keep these items as requirements in standards  
 Move these items into references

Comments: The WECC RCCWG believes that some provisions of TOP-001-1 R1 are standard requirements, and that whether TOP-002-2 R2 is a standard requirement is less clear. The group agrees that in order to be a standard requirement there needs to be a link to an impact on the Bulk Electric System. The requirements need to be reworded to be measurable and substantiable.

- 2. The SAR DT believes that SOLs, while very important to local utility operations, are not a true Bulk Electric System reliability issue, and as such, believes that any requirements related to SOLs should be moved into guides or other reference documents, to be added to the literature on “good utility practice.” Do you agree?**

- Yes  
 No

Comments: While it is true that some SOLs do not have Bulk Electric System impact, such as a wave trap or customer transformer overload (local issues), others may lead to an impact on the Bulk Electric System. The group feels that if it can be shown through studies that a SOL does not have an impact on the Bulk Electric System, that particular SOL could be exempted from standards requirements. The group also questions whether a SAR without Bulk Electric System impact, but with potential local impact that would require a NERC disturbance report should be a standard requirement.

- 3. The SAR DT identified many comments submitted (See Appendix B of the SAR) on the technical content of the standards and the SAR drafting team believes that the standard drafting team should consider these comments, subsequent to the approval of the SAR, in the development of Standards Revisions. Do you agree with the SAR drafting team’s assessment of those comments that are being recommended for referral to the standard drafting team?**

- Yes  
 No

Comments: The references, such as FERC Order 693, are so detailed that the WECC RCCWG does not believe the group can comment on the standard drafting team assessment of those comments.

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**4. Are there any standards included in the SAR that shouldn't be included?**

The following standards were included in the SAR and should be removed: None are currently identified, but some may become apparent later.

**5. Are there standards that should be added to the SAR?**

The following standards should be added to the SAR: None are currently identified, but some may become apparent later.

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**6. Do you agree that there is a reliability-related need to revise the set of standards addressed in this SAR?**

Yes

No

Comments: The WECC RCCWG believes that some of the standard requirements need to be clarified.

**7. Do you agree with the scope of this SAR?**

Yes

No

Comments:

**8. If you aware of any regional variances or business practices that should be developed in association with this SAR please list them here.**

Regional Variances

Business Practices

Comments:

**9. If you have any other comments on this SAR that you haven't identified above, please provide them here.**

Comments: The WECC RCCWG suggests differentiating TOP directives from Reliability Coordinator directives. This may be done with specific language. It should be clear to the entity receiving a directive who issued that directive. It may be beneficial to have a NERC definition for a "Reliability Coordinator Directive" and a "Transmission Operator Directive".