

## **Consideration of Comments on 2<sup>nd</sup> Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

The Real-time Transmission Operations and Balancing of Load and Generation SAR requesters thank all commenters who submitted comments on the first draft of SAR. This SAR was posted for a 30-day public comment period from August 7, 2007 through September 7, 2007. The requesters asked stakeholders to provide feedback on the SAR through a special SAR Comment Form. There were 15 sets of comments, including comments from 46 different people from 30 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, several minor changes were made to the SAR:

- A definitive statement was added to the SAR to clarify that the intent and scope of the SAR was not to remove requirements to monitor and be aware of SOLs.
- As suggested, Generator Owner was added to the list of applicable entities.
- For TOP-002-2: R7, R9, and R12 are no longer marked for possible deletion.
- In COM-002-2, a typo was corrected to point out that the correct reference is to PER-003-1 and not PER-003-0.

The SAR DT feels that these changes are not of a magnitude to require the re-posting of the SAR and is recommending that the SAR be forwarded to the Standards Committee for approval to move on to the standards development process.

It should be noted that there have been opinions expressed that more clarity is needed around SOLs – What are they? Who is responsible? Are they needed at all? While there are commenters who want this SAR DT to address those concerns, this SAR DT stands on its original goal, to remove oversights and problems caused by Version 0, et al. and to revise the resultant set of requirements with respect to the directives in FERC Order 693 and the latest Standard Review Guidelines.

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

[http://www.nerc.com/~filez/standards/Real-time\\_Operations\\_Project\\_2007-03.html](http://www.nerc.com/~filez/standards/Real-time_Operations_Project_2007-03.html)

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

---

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

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

---

The Industry Segments are:

- 1 – Transmission Owners
- 2 – RTOs, ISOs
- 3 – Load-serving Entities
- 4 – Transmission-dependent Utilities
- 5 – Electric Generators
- 6 – Electricity Brokers, Aggregators, and Marketers
- 7 – Large Electricity End Users
- 8 – Small Electricity End Users
- 9 – Federal, State, Provincial Regulatory or other Government Entities
- 10 – Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Thad K. Ness	American Electric Power (AEP)	✓					✓	✓					
2.	Jason Shaver	American Transmission Co.	✓											
3.	Paul Bleuss (G3)	CMRC												✓
4.	Greg Tillitson (G3)	CMRC												
5.	Jeanne Kurzynowski (G1)	Consumers Energy			✓	✓								✓
6.	Ed Davis	Entergy Services							✓					
7.	Sam Ciccone	FE FERC Compliance Dept.	✓		✓			✓	✓					
8.	Doug Hohlbaugh	FE FERC Compliance Dept.	✓		✓			✓	✓					
9.	David Folk	FirstEnergy Corp. (FE)	✓		✓			✓	✓					
10.	Roger Champagne	Hydro-Québec TransÉnergie	✓											
11.	Ron Falsetti	IESO		✓										
12.	Kathleen Goodman	ISO New England		✓										
13.	Jim Cyrulewski (G1)	JDRJC Associates									✓			
14.	Eric Ruskamp (G5)	MRO												✓
15.	Joe Knight (G5)	Great River Energy												
16.	Terry Bilke (G5)	MISO												
17.	Mike Brytowski (G5)	MRO												
18.	David Rudolph (G5)	Basin Electric												
19.	Pamela Oreschnick (G5)	Xcel Energy												
20.	Robert Coish (G5)	Manitoba Hydro												
21.	Neal Balu (G5)	WPSR												
22.	Carol Gerou (G5)	Minnesota Power												
23.	Jim Haigh (G5)	WPSA												
24.	Ken Goldsmith (G5)	ALTW												
25.	Tom Mielnik (G5)	MEC												
26.	Craig McLean	Manitoba Hydro	✓		✓			✓	✓					

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
27.	Chris Manchur (G1)	Manitoba Hydro	✓											
28.	Jason L. Marshall (G1)	Midwest ISO Stakeholders		✓										
29.	Rick White	Northeast Utilities	✓											
30.	David L. Gladey	PPL Susquehanna			✓		✓							
31.	Phil Riley (G2)	PSC of SC											✓	
32.	Mignon L. Clyburn (G2)	PSC of SC											✓	
33.	Elizabeth Fleming (G2)	PSC of SC											✓	
34.	G. O'Neal Hamilton (G2)	PSC of SC											✓	
35.	John E. Howard (G2)	PSC of SC											✓	
36.	Randy Mitchell (G2)	PSC of SC											✓	
37.	Robert Moseley (G2)	PSC of SC											✓	
38.	David A. Wright (G2)	PSC of SC											✓	
39.	Thomas J. Bradish	Reliant Energy			✓		✓	✓						
40.	Mike Gentry (G3)	Salt River Project												✓
41.	Marc Butts (G4)	Southern Company Services	✓											
42.	Roman Carter (G4)	Southern Company Services	✓											
43.	Jim Busbin (G4)	Southern Company Services	✓											
44.	J. T. Wood (G4)	Southern Company Services	✓											
45.	Nancy Bellows (G3)	WACM												✓
46.	Barbara Kedrowski (G1)	We Energies					✓							

I - Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 - Midwest ISO Stakeholders

G2 - Public Service Commission of South Carolina (PSC SC)

G3 - WECC Reliability Coordination Comments Work Group

G4 - Southern Company Services, Inc. (SOCO)

G5 - Midwest Reliability Organization (MRO)

**Index to Questions, Comments, and Responses**

1. Do you agree to expand the scope of the SAR to include IRO-004, -005, & -006 for the purpose of eliminating redundancy related to the Transmission Operator and Balancing Authority? ..... 5

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

1. Do you agree to expand the scope of the SAR to include IRO-004, -005, & -006 for the purpose of eliminating redundancy related to the Transmission Operator and Balancing Authority?

**Summary Consideration:**

The consensus (12 submissions, 65 persons, 21 companies, 31 industry segment representations vs. 5 submissions, 9 persons, 9 companies and 10 industry segment representations) agreed that the scope of the SAR should be expanded to include the three subject IRO standards.

The primary concern voiced in this comment submittal was with the issue of SOLs. It is noted that the SOL issue is not what this SAR was about. This SAR was issued to clarify issues from Version 0, from the ERO regulatory agencies and other cited comments – and to improve the overall quality of the resultant set of requirements and standards.

The current SAR DT is composed of industry experts with long experience regarding the various NERC efforts to attempt to clearly define system limits. However, the current SAR DT does not claim to possess comprehensive knowledge of all of the issues related to SOL issues. We believe that the SOL issue must be addressed directly in a specific SAR effort formed to address it with a larger multi-disciplinary group.

It is clear that more clarity is needed around SOLs – What are they? Who is responsible? Are they needed at all? While there are commenters who want this SAR DT to address those concerns, this SAR DT stands on its original goal, to remove oversights and problems caused by Version 0, et al.

Question #1			
Commenter	Yes	No	Comment
Manitoba Hydro	<input checked="" type="checkbox"/>		Although it is not covered in this SAR's second draft we are assuming from your response to comments on the initial draft that Requirements will remain to ensure that SOLs will be monitored by the RC and TOP and that appropriate action will be taken when SOLs are exceeded. This we agree with.
<p><b>Manitoba supports expanding the scope.</b></p> <p><b>Response:</b>                      Unless changed in the Standards process, IRO-005 R2 would still require that SOLs be monitored; and IRO-005 R17 would still require that SOL violations be corrected.</p> <p>The SAR DT defines a scope, it can not and does not ensure that a given requirement remains or is deleted. The best the SAR DT can ensure is that an issue in its scope has the opportunity to be addressed.</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
<b>Northeast Utilities</b>	<input checked="" type="checkbox"/>		<p>TOP-001-1 R7.3 Replacing "at the earliest time" with "without delay" is not appropriate, since the step covers "When time does not permit.....". With this change, if there were any delay, it would be a noncompliance.</p> <p>TOP-007-0 Rewording R2 to say act "without delay", in lieu of "as soon as possible" is not desirable. With this change, if there were any delay, it would be a noncompliance.</p>
<p><b>NE Utilities supports expanding the scope of the SAR.</b></p> <p><b>Response:</b></p> <p>This wording should be discussed during the standards process. TOP-001-1 is an exclusion from the prohibition on 'blindly' removing facilities from service. The proposal to change the phraseology is suggested to address the issue that the current requirement allows too much leeway in informing the RC of what was done.</p> <p>TOP-007-0 does require a TOP to act to correct an IROL, and if the TOP does not act - then it is in non-compliance with the standard. The issue raised by the comment has been previously debated. "As soon as possible" was considered too subjective, whereas "without delay" was considered less subjective. The real question is what constitutes "action". The time associated with evaluating the system is considered (by the writers of the proposal) to be an action. The impetus behind the requirement is that each TOP already has its list of IROL response procedures, and therefore (unless there is a real good reason) the TOP should be implementing those procedures. The underlying 'evaluation action' is the time when reasoned adjustments to the plan is expected. One can debate how long the evaluation time should be, and even debate what is an evaluation but no one was able to come up with a standardized performance. It is left to the voters to decide if this is a problem and if it is how to fix the problem.</p>			
<b>PPL Susquehanna</b>	<input checked="" type="checkbox"/>		<p>IRO-004-1 is applicable to Generator Owners, currently the SAR only list the generator operators. The reliability functions listed in the SAR should be revised to include Generator Owner.</p>
<p><b>PPL Susquehanna supports expanding the scope of the SAR.</b></p> <p><b>Response:</b></p> <p>Thank you, the SAR Applicability list will be so amended.</p>			
<b>Reliant Energy</b>	<input checked="" type="checkbox"/>		<p>In IRO-004-1 Reliability Coordination Operations Planning section 4.6 Generator Owners should be deleted. This standard is also applicable to generator operators as listed in 4.7. The justification for deleting GO is that this reliability standard addresses the</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>operation of a generating facility. The GOP and not the GO would be the entity most knowledgeable of equipment capabilities and ratings. The GOP would be the entity conducting and supervising any testing or unit operation required to comply with this standard. The GOP is most likely the entity responsible for maintenance of unit equipment so the GOP would be most familiar with equipment limits, ratings and capabilities. In addition, replacing GO with GOP in this standard and other standards has the following benefits:</p> <ol style="list-style-type: none"> <li>1. How a facility is operated has more impact on reliability than ownership of a facility.</li> <li>2. Removing the GO from responsibility will more clearly define who is responsible for standard compliance at jointly-owned facilities.</li> <li>3. For jointly-owned facilities, this change eliminates the need for each owner to make redundant submittals and streamlines administration for each Regional Entity.</li> <li>4. As the industry moves away from the regulated model, more non-traditional entities will become owners of facilities. These owners typically contract operation responsibilities to entities with operating experience. The operating entity will more fully understand the importance of reliability and would be in a better position to comply.</li> <li>5. Requiring the GO to be responsible for standard compliance may in some cases discourage non-traditional entities from owning generating assets, which will hinder competition in the market.</li> </ol>
<p><b>Reliant supports expanding the scope of the SAR</b></p> <p><b>Response:</b>                      The scope of this SAR with regard to IRO-004 is to simply eliminate redundancies within that standard for the TOP. We suggest that you should submit these comments to the SDT dealing with specific changes to the IRO requirements.</p> <ol style="list-style-type: none"> <li>1. The line of reasoning for obligating an Owner for providing 'unit ratings' is as follows: The Owner has the inherent right (as the owner of the facility) to rate that facility in any way the owner sees fit. On the other hand, the Operator of the asset can be a third party that must respect the owner's boundaries and still work within the constraints of the BES. The Operator has the right / obligation to use the Owner's rating to stay within the reliability constraints of the BES. The Operator may further constrain a units operation, but should not (without the owner's permission) violate the Owner's imposed unit rating.</li> <li>2. The asset belongs to the Owner, and the Owner's risk management should be respected.</li> <li>3. This is a legal / contractual issue not a NERC issue.</li> </ol>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
<p>4. This is a legal / contractual issue not a NERC issue.</p> <p>5. This is an opinion / projection that is outside NERC / the SAR DT concerns.</p>			
American Electric Power	<input checked="" type="checkbox"/>		<p>We agree with the concept of eliminating redundancy in the NERC Standards. However, Project 2006-08 involves re-writing IRO-006 in three phases and is currently in phase one. Any changes required to IRO-006 to eliminate redundancy of Transmission Operator and Balancing Authority requirements in other standards should be coordinated with, and handed off to, the Project 2006-08 IRO-006 Standard Drafting Team. Thus, IRO-006 should not be included in the scope of this SAR. We have no objection to including IRO-004 and IRO-005 into the scope of this project and we stand by our comments to the first SAR.</p>
<p><b>AEP supports expanding the SAR for IRO-004 and 005.</b></p> <p><b>Response:</b> IRO-006 The SAR DT recognizes that there is a need for coordination among different NERC Projects but it is the Standards DT that has the responsibility for coordinating any changes that the Industry approves, and to coordinate them with other Projects (in coordination with the NERC Standards Manager and the NERC Standards Committee). Project 2006-08 is designed to focus on the TLR process. The SAR DT is focused on responding to previous unanswered comments; and in identifying and eliminating redundancies.</p>			
Entergy	<input checked="" type="checkbox"/>		<p>We have additional comments on other parts of this revised SAR.</p> <p>COMMENTS ON TOP-001-1</p> <p>We suggest the deletion of the first recommended change to TOP-001-1:</p> <ul style="list-style-type: none"> <li>o Removal of R2 due to redundancy with R1. R2 largely describes an ill-defined procedure which should not be in a standard.</li> </ul> <p>This suggested change was revised from the first posting of this SAR, changing "with R3" to "with R1". Each of the three requirements of TOP-001-1 address different</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>responsibilities of a TOP. R1 states a TOP has responsibility and authority, R2 states the TOP will take action, and R3 states the TOP and others will comply with the directives of the RC, or TOP. We do not agree R2 contains an ill-defined procedure.</p> <p>However, we may agree to remove TOP-001-1 R2 because it may be redundant with TOP-008-1 R1.</p> <p>We also suggest revising the TOP-001-1 draft change from:</p> <ul style="list-style-type: none"> <li>- Eliminating R5 in light of possible redundancy with IROL standards.</li> </ul> <p>to:</p> <ul style="list-style-type: none"> <li>- Eliminating R5 IF REDUNDANT with IROL standards.</li> </ul> <p>COMMENTS ON TOP-002-2</p> <p>The first suggestion of TOP-002-2 suggests deleting R1 as it is redundant with TOP-008-1 R1. We recommend changing the TOP-008-1 reference to R2, rather than R1. We agree that TOP-002-2 can be eliminated as being redundant with TOP-008-1 R2, not TOP-008-1 R1.</p> <p>We do not agree with the suggestion that TOP-002-2 that R4 should be deleted. TOP-002-2 R4 is a requirement on the BA and TOP while IRO-005-2 R9 is a requirement on the RC.</p> <p>We do not agree with the suggestion of deleting TOP-002-2 R6 as it is redundant with IRO-005-2 R9. However, we do agree with deleting R6 if the reason is changed to being redundant with EOP-001 R3.2. With this change we agree with deleting TOP-002-2 R6.</p> <p>We do not agree with the suggestion to delete TOP-002-2 R7 and R9. Both these requirements should remain in TOP-002. The reason for the suggested deletion is R7 and R9 are redundant with BAL-007 through BAL-011. However, BAL-007 through BAL-011 were not approved by the Ballot Body and are not NERC standards. Therefore TOP-002-2 R7 and R9 are not redundant and the suggestion should be deleted.</p> <p>TOP-002-2 R12 should not be deleted. We believe it is not redundant of the requirements in FAC-010 SOL Methodology for the Planning Horizon and FAC-011 SOL Methodology for the Operations Horizon.</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>COMMENTS ON TOP-004-1</p> <p>The first entry for TOP-004-1 suggests deleting reference to SOL in R1. Deleting R1 indicates TOPs are not required to operate within SOLs. TOPs should operate within SOLs and this entry should be deleted from the SAR.</p> <p>COMMENTS ON TOP-005-1</p> <p>It is suggested deleting R1 and R1.1 as they are redundant with IRO-010-1. However, IRO-010-1 is not an approved standard so R1 and R1.1 should remain in TOP-005-1. That is unless the SAR is changed to say R1 and R1.1 should be deleted after IRO-010-1 is approved and has provisions that duplicate R1 and R1.1.</p> <p>It is suggested that R4 be deleted from TOP-005-1. Do not delete R4 (PSE provides information as requested for reliability assessments and coordinate operations) as it is significantly more encompassing than INT-001-2 R1 (which only requires PSEs provide Arranged Interchange to the IA.) If anything is done INT-001-2 R1 should be deleted and TOP-005-1 R4 should be kept.</p> <p>COMMENTS ON TOP-006-1</p> <p>It is suggested that R1 be deleted from TOP-006-1. Do not delete R1 (report facility status) as it is significantly different than FAC-009-1 R2 (report facility ratings). They are not the same.</p> <p>It is suggested that R4 be deleted from TOP-006-1 as the requirement is redundant with BAL-001 and -002 and is addressed in IRO-010 R1 and R3. R4 should only be deleted if the requirements are actually included in the final approved IRO-010.</p> <p>It is suggested that R6 (use sufficient metering) be deleted from TOP-006-1 as the requirement is redundant with BAL-005-1 (annually check and calibrate time error and frequency devices). We suggest R6 be kept in TOP-006-1 since the requirements are not in BAL-005-1.</p> <p>COMMENTS ON TOP-007-0</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>It is suggested to delete R4 in deference to the RC Project. We suggest R4 be kept in TOP-007-0 until the RC Project is a NERC approved standard.</p> <p>COMMENTS ON TOP-008-0</p> <p>It is suggested to delete R1 (relieve IROL or SOL) as it is redundant with TOP-007-0 R3 (relieve IROL). We suggest R1 be kept in TOP-008-0 or include SOLs in TOP-007-0 R3.</p> <p>COMMENTS ON COM-001-1</p> <p>No Comments.</p> <p>COMMENTS ON COM-002-2</p> <p>The first bullet is to delete the second sentence of COM-002-2 R1 as it is redundant with PER-003-0 R3. However, there is no R3 in PER-003-0 so we recommend the second sentence stay in COM-002-2 R1.</p>
<p><b>Entergy agrees with expanding the scope of the SAR.</b></p> <p><b>Response:</b></p> <ol style="list-style-type: none"> <li><b>TOP-001-1:</b> Entergy and the DT both agree with the removal of <b>R2</b>; but Entergy disagrees with the rationale provided. The purpose of the SAR DT is to provide a scope for a Standard DT. The SAR DT's rationale is provided to help understand the DT's justification, the rationale is not provided for approval or inclusion in the standard. This reply also applies to the comment for <b>R5</b>. Entergy approves considering <b>R5</b> for removal, but does not agree with the justification. The words used in the request's justification are not under debate. The debate is whether or not to keep the item in scope.</li> <li><b>TOP-002-2:</b> Entergy and the DT both agree with the removal of <b>R1</b>; but Entergy disagrees with the rationale provided. The issue that must be resolved is whether or not it is sufficient that a NERC standard hold one entity responsible for coordinating a given task, or should every entity be assigned partial responsibility. This requirement is therefore included within scope and will best be debated in the Standards Development process. We both agree with the removal of <b>R6</b>; but Entergy disagrees with the rationale provided.</li> </ol> <p>You are correct that BAL-007 – 011 have not been approved and therefore R7 and R8 can not be held redundant.</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>However, this does not remove TOP-002-2 from the scope of the SAR.</p> <p>You are correct that R12 is not redundant with the FAC-010 &amp; 011 standards. The elimination of this requirement does not materially affect the scope of the request, as TOP-002 will still remain in scope.</p>
			<p>3. <b>TOP-004-1:</b> The commenter stated that removing R1 of TOP-004 will remove the obligation of TOPs from operating within SOLs. The SAR DT notes that IRO-005 R17 properly places the responsibility on the RC who in turn has the authority to require the TOP to act. The debate is best carried out by the Industry in the standards process not in the scoping phase. If the Industry agrees that the responsibility is on the RC and that a requirement on the TOPs is unnecessary then the requirements on the TOPs will be removed. If the Industry agrees that there is a separate need for TOPs to have a standard requirement on them, then the requirement will be retained. Either way there is a need for the issue to be discussed.</p>
			<p>4. <b>TOP-005-1:</b> The commenter is correct that the observed redundancy for R1 and R1.1 is predicated on a non-approved standard. The SAR DT agrees that any Industry-approved changes should / must be coordinated with the other BOT-approved standards in place at the time the new modifications are to be implemented.</p> <p>The commenter is correct that TOP-005-1 R4 is more inclusive than INT-001-2 R1. The SAR DT's intent was to delete one of the two. The decision of which if any of the two requirements to retain, modify or delete is to be decided by the industry.</p>
			<p>5. <b>TOP-006-1:</b> The commenter is correct that the data requirements of TOP-006-1 R1 (unit availability) is different from the data requirements of FAC-009-1 R2 (unit capability / rating).</p> <p>Regarding R4 the SAR DT agrees that any Industry-approved changes should / must be coordinated with the other BOT-approved standards in place at the time the new modifications are to be implemented.</p> <p>The commenter is correct that R6 (sufficient metering) is different from BAL-005-1 (calibration).</p> <p>TOP-007-0: Regarding R4, the SAR DT agrees with Entergy that any Industry-approved changes should / must be coordinated with the other BOT-approved standards in place at the time the new modifications are to be implemented.</p>
			<p>6. <b>TOP-008-0:</b> The debate over SOL/IROL is best carried out by the Industry in the standards process not in the scoping phase. If the Industry agrees that the responsibility is on the RC and that a requirement on the TOPs is unnecessary then the requirements on the TOPs will be removed. If the Industry agrees that there is a separate need for TOPs to have a standard requirement on them, then the requirement will be retained. Either way there is a need for the issue to be</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
discussed.			
7. The redundancy is between PER-003-1 (not PER-003-0) R3 and COM-002-2 R1.			
FirstEnergy Corp.	<input checked="" type="checkbox"/>		<p>FirstEnergy, like some other entities, is concerned that the SAR drafting team did not provide an opportunity to comment on their proposed resolution to the SOL issue identified in Question 2 of the previous draft's comment form. While it is not crystal clear to us that the SAR Drafting Team intended to removal all references to SOLs from the Standards, it is also not clear to us that the revisions made to the SAR by the drafting team adequately addressed the views expressed by the commenters. The messages sent by the SAR Drafting Team in the Comment Summary and the individual responses to comments seem mixed. The response to comments document indicates that the SAR drafting team will pass comments on to the Standard Drafting Team; however, the modifications to the SAR were minor and did not provide any guidance to the Standard Drafting Team on the method for applying these comments. Furthermore, the SAR Drafting Team did not seem to embrace the comments provided by the industry on this topic. We understand that the comments received were provided by a small segment of the industry; however, we are also aware that the communication from the commenters was was clear. The majority of commenters supported the retention of SOLs in the standards as necessary and appropriate.</p> <p>All of this being said, while we clearly do not agree with the wholesale removal of SOLs from the Standards, but we do support the removal of SOLs from TOP-004-1 Requirement 1 as specified in the SAR. We support this because the methodology used to determine SOLs, and for that matter, IROs is not clearly defined. This means that one organization may be using a methodology that produces an eight hour SOL while another's method may produce a one hour SOL. We believe that the company using an eight hour limit should not be bound as tightly to that limit as a company that uses a one hour limit. Therefore, the SAR should direct the Standard Drafting team to develop, or at least investigate the development, of a limit methodology applicable across all of NERC that can be consistently applied.</p> <p>FE also offers the following comments to specific items revised in the SAR:            Added IRO-004, IRO-005 &amp; IRO-006 to the scope of the standards to be reviewed to eliminate redundant requirements.            FE agrees</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>Clarified that the reason for recommending the deletion of TOP-002-2, R8 is because the requirement is unmeasurable.  R8. Each Balancing Authority shall plan to meet voltage and/or reactive limits, including the deliverability/capability for any single contingency.  FE disagrees with this direction.  There does not appear to be an industry agreed upon justification given to remove this requirement in lieu of developing 'R8' along with eliminating ambiguity in the existing measure for this requirement described in 'M3'.</p> <p>Removed the recommendation for deleting TOP-002-2, R11:  R11. The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject confidentiality requirements), and to its Reliability Coordinator.  FE agrees</p> <p>Reworded the recommendation in TOP-002-2, R14 &amp; R15 to clarify that these requirements may be better addressed in other standards.  R14. Generator Operators shall, without any intentional time delay, notify their Balancing Authority and Transmission Operator of changes in capabilities and characteristics including but no limited to:  R14.1. Changes in real output capabilities  R15. Generator Operators shall, at the request of the Balancing Authority or  Transmission Operator, provide a forecast of expected real power output to assist in operations planning (e.g., a seven-day forecast of real output).  FE agrees, but with the following provision:</p> <p>The SDT should also develop clear justification for addressing these requirements in "other standards" while identifying the appropriate "other standards"; and, if justified, the SDT should develop a clear, industry approved plan to transfer these requirements to those identified standards.</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>Clarified the deletion requested in TOP-004-1, R1 is the reference to 'SOLs' R1. Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs). FE agrees, but with the following provision:</p> <p>The SDT should also consider verbiage in the standards with regard to how SOLs can still be conveyed with some indirect measure (non-sanctioned) of importance in development of the applicable standards.</p>
<p><b>FE agrees that IRO-004, 005 and 006 should be included in the scope of the SAR to eliminate redundancies</b></p> <p><b>Response:</b>  <b>TOP-002-2</b>                      The debate regarding the removal of given requirements will be part of the standards development process (not the SAR process). The direction and philosophy of the Industry will be decided by the comments and responses to the standards. The Industry will decide whether or not to retain TOP-002-2 R8. The comments and responses will decide whether or not the measures associated with are appropriate. The question is whether or not to have the debate, and your response shows that there is such a need.</p> <p>The SAR DT recognizes the need for coordination among standards. However, the SAR DT has the responsibility for defining the scope, it does not have the responsibility or the power to develop an implementation scheme for changes that have not yet been identified let alone approved. It is the Standards DT responsibility to coordinate the implementation of any changes that the industry approves during the standards development phase of the process.</p> <p><b>TOP-004-1</b>                      The issue of SOL definition and requirements will be dictated by what requirements and standards are approved by the Industry.</p>			
<b>PS Commission of South Carolina</b>	<input checked="" type="checkbox"/>		
<b>Southern Company</b>	<input checked="" type="checkbox"/>		
<b>WECC Reliability Coordination Comments Work</b>	<input checked="" type="checkbox"/>		

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
Group			
<p><b>Response:</b>  <a href="#">The RTO SAR DT thanks you for your support.</a></p>			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Since this comment form has only one question, we are checking both boxes - yes for inclusion of IRO-004, -005 and -006 but no to some of the changes made or not made to the previous SAR, and provide additional comments as follows:</p> <p>(1) Specific to the bullets provided in the background section, above, we agree with the first bullet and do not have any comments on the 2<sup>nd</sup> to 4<sup>th</sup> bullets. However, we do not agree with the 5<sup>th</sup> bullet to remove reference to SOL from TOP-004-1 R1, which requires that "Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs)."</p> <p>In the SAR DT's response posted in Consideration of Comments, it states that "Based on stakeholder comments, the SAR DT is proposing to retain requirements to (1) be aware of SOLs and (2) monitor system conditions related to SOLs." Removing reference to SOL in TOP-004-1 R1 contradicts with the above statement. Further, we continue to strongly disagree with the SDT that TOPs are not required to operate within SOLs - We agree that all SOLs are not created equally but there are those SOLs which have a tremendous impact on system reliability, much in the same way as IROLs, and given the appropriate conditions, these very SOLs, if not complied with, could have a highly detrimental impact on the system and subsequently the interconnection (also see comments by others in the Consideration of Comments).</p> <p>(2) In the Consideration for Comments, the SAR DT responded to our previous comments under Question #9, from TOP-001 R2 to TOP-002 R18. We appreciate that the DT's concurs with most of our comments.</p> <p>However, we are unable to find the DT's response to our other comments, from TOP-003 to TOP-008. A review of the revised SAR indicates that changes proposed in the previous SAR for these standards/requirements would remain, some of which we expressed disagreement in our previous comment submission. Not seeing a response from the SAR DT, we are uncertain whether our comments were overlooked, or the DT concluded that our comments did not result in any material changes to the proposed revisions to these</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>standards.</p> <p>Assuming it was an oversight, we are providing our comments on TOP-003 to TOP-008 again as follows. We would appreciate seeing the DT's response to these comments when the Consideration of Comments on this revised SAR is posted.</p> <p>TOP-003-0</p> <p>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.</p> <p>TOP-004-0</p> <p>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.</p> <p>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.</p> <p>R3: We disagree with removing this requirement for the above same reason.</p> <p>TOP-005-1</p> <p>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".</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>TOP-006-1</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>TOP-008</p> <p>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.</p>
<p><b>IESO supports expanding the scope of the SAR.</b></p> <p><b>Response:</b></p> <p>The IESO requests a comprehensive debate on SOLs, and that requires an independent SAR. The proposal to change TOP-004 would eliminate the immediate conflict and allow NERC to have a standard that all entities agree with (i.e. everyone agrees that TOPs should operate within IROLs.) while leaving the debate on SOLs for another SAR. As such the decision would be made by the voters and not by the SAR DT. The concern among some is with the fact that System Operating Limits are not "in every case" adhered to (or needed to be adhered to) – as IESO notes in its comments "not all SOLs are created equal." TOPs often make use of multiple System Operating limits (instantaneous, short term and longer term limits). Exceeding a given limit while respecting a shorter time limit is an everyday occurrence. When is the TOP non-compliant? To which value? IROLs on the other hand are not viewed in the standards in the same way as SOLs. The IROL standards go as far as to require proactive operations before the limit is violated.</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>The SAR DT did not see a contradiction in retaining requirements to monitor SOLs because although it is not uncommon to exceed some SOLs, it is still important to know what is happening on the system. By leaving the monitoring to RCs, the standards ensure that someone is watching out for 'reliability' but not necessarily for a precise limit compliance. RCs must be aware of those SOLs that do "have a tremendous impact". But unless and until there is a better definition of SOL, it will be impossible to separate which SOLs require compliance and which SOLs do not.</p> <p><b>TOP-003-0</b>                      IRO-010-1 (dated March 8, 2007) does not have an R4. The SDT reference to R3 (which states that everyone must provide data to the RC) is a good replacement for the prescriptive TOP-003-0 R1.3 (which fixes times of day). Indeed one could argue that such timing requirements belong to NAESB not NERC.</p> <p>The SAR DT does recognize that IRO-010-1 has not been approved. Therefore the Standards DT must consider that any Industry-approved changes should / must be coordinated with the other BOT-approved standards in place at the time the new modifications are to be implemented.</p> <p><b>TOP-004-0</b>                      The SAR DT interprets R1 (having the RC and TOP both responsible for the same IROL) as redundant and suggests that the Industry consider formalizing the requestor's view. IESO asks that this debate not be raised. The SAR DT believes that it should be discussed. The SAR DT merely keeps this issue in its scope; the voters will decide the merit of that view.</p> <p>R2 follows the same logic as R1. The SAR DT believes that the issue of whether or not RC and TOP having identical responsibilities is redundant is an issue that they want in their SAR.</p> <p>R3 – The debate between RC and TOP notwithstanding, this requirement must be kept within scope, if for no other reason than the fact that both FERC and NERC require removal of all references to RRO.</p> <p><b>TOP-005-1</b>                      The SAR DT is not responsible for finding a home for the ISN. IESO agrees that the current requirement "is not a reliability requirement". IESO has not provided any justification for its position that the SAR DT has that obligation.</p> <p><b>TOP-006-1</b>                      IESO is correct that the data requirements of TOP-006-1 R1 (unit availability) are different from the data requirements of FAC-009-1 R2 (unit capability / rating).</p> <p>Contrary to the IESO statement, R4 requires does not require operating entities to do anything; R4 requires them to have</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>data to predict "near-term load patterns". The SAR DT original comment was based on the concept that the real objective of load forecasting is system control. Hence whether or not an entity has data, the BAL standards require them to control the system. Of course near-term load forecasting is used in other areas of operation (e.g. unit commitment); the fact is that R4 is considered by some as being meaningless as a standard. As long as the entities have access to the internet they will have information to predict load.</p> <p>R7: The SAR DT does recognize that BAL-008 &amp; 009 were not approved, but is also aware that they are under active reconsideration. R7 requires monitoring of frequency. The issue of redundancy arises from the fact that BA-005 requires BA have the information to compute ACE, and by definition ACE includes frequency, ergo, the BA is for all practical purposes monitoring frequency.</p> <p>Even if BAL-008 doesn't pass again, the RC is responsible for reliability (real power, reactive power, voltage and frequency). It makes no sense to have a standard for each item that must be monitored. Common sense must be applied to the standards.</p> <p><b>TOP-008</b> See first two paragraphs of Response.</p>
MRO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>If the SAR Drafting team feels that the Standard Drafting Team can handle three additional standards the MRO has no issue with including them in the scope.</p> <p>Additional comments:</p> <p>It has come to our attention that TOP-001-1 R3 is an exact duplicate of IRO-001-1 R8. Of these two instances, it seems most appropriate to remove the Requirement in IRO-001-1 as that standard is focused on the responsibilities and authorities of the Reliability Coordinator. The MRO recommends either including this in the scope of this SAR or adding this comment to the future work of the IRO-001-1 standard.</p> <p>R8 in TOP-002-2 should not be eliminated because it is not measurable. The SDT should attempt to modify it so that there is a requirement on maintaining voltage or reactive levels that is measurable. If this is not possible, deletion would then be appropriate. It would seem more appropriate for the SDT to make this determination rather than the SAR DT.</p> <p>Because the SAR states that R14 and R15 in TOP-002-2 may be better addressed in</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>other standards, we are concerned that the standards drafting team may delete these requirements under the assumption that another team will add them to another standard. This standard drafting team should not remove these requirements unless they simply are not needed for reliability or are added to another standard in conjunction with the deletion.</p> <p>The MRO members are also confused on the SOL issue. In the Consideration of Comments to SAR 1 question #2, the SAR DT asked the if it would be appropriate to remove all requirements related to SOLs from the NERC Reliability Standards. 5 groups of commenters agreed with removing SOLs, 9 disagreed and 5 abstained. The SAR DT concluded that they would propose to retain requirements to (1) be aware of SOLs and (2) monitor system conditions related to SOLs, yet nothing was changed in the scope of this SAR to reflect that decision. It would have been advantageous to request comments on the new direction proposed by the SAR DT on SOLs as it was heavily commented on during the last round of comments. Also it appears that all SOL are not crated equal, see the discussion below discussing potential SOL issues.</p> <p>To the extent that an SOL is truly local (i.e. radial load serving line), there is no need for the SOL requirements. However, there are SOLs that may not pose a transmission security problem but could impose a generation adequacy problem on another system if the equipment should become damaged. Imports into another system may then be reduced. Additionally, multiple SOLs occuring on a system may be a sign of an undetected IROL. Clearly there should be an obligation on the part of the TOP and RC to review the situation to rule it out.</p>
<p><b>MRO supports expanding the scope of the SAR.</b></p> <p><b>Response:</b> Both TOP-001 and TOP-002 are included in the scope of this SAR, and MRO will have the opportunity to be involved in what is or isn't included in those standard.</p> <p>Regarding the issue of SOLs, the SAR DT did not and does not intend to include a complete discussion of all the issues that must be debated on that topic. The SAR DT agrees with MRO that not all SOLs are created equal, and that is the reason the DT is proposing within this Project to, as much as possible, focus on IROLs.</p> <p>To eliminate confusion, MRO may desire to submit its own SAR regarding how to address SOLs.</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
ISO New England NY ISO		<input checked="" type="checkbox"/>	<p>Both IRO-006-3 and draft IRO-006-4 have the TOP listed in applicability section. However, neither actually has any requirement in the standard. They simply reference the TOP in the requirements.</p> <p>Because there is not the typical question regarding additional comments in the comment form, we will provide those here.</p> <p>R8 in TOP-002-2 should not be eliminated because it is not measurable. The standards drafting should attempt to modify it so that there is a requirement on maintaining voltage or reactive levels that is measurable. If this is not possible deletion may be appropriate, but the industry, not the SAR drafting team, should not be making this determination.</p> <p>Because the SAR states that R14 and R15 in TOP-002-2 may be better addressed in other standards, we are concerned that the standards drafting team may delete these requirements under the assumption that another team will add them to another standard. This standard drafting team should not remove these requirements unless they simply are not needed for reliability or added to another standard in conjunction with the deletion.</p> <p>The SAR drafting team should modify the scope so that all requirements to monitor and control flows within SOLs are not eliminated. While the SAR drafting team points out in their response to the comments that NERC's definition defines an SOL as local, eliminating all requirements to monitor and control to SOLs will be detrimental to reliability. Multiple SOLs occurring on a system may be a sign of an undetected IROL or, if left unchecked, propagate into an IROL. This was the cause of the August 14<sup>th</sup> blackout. Clearly there should be an obligation on the part of the TOP and RC to monitor and mitigate these limits to prevent such propagation.</p>
<p><b>ISO NE &amp; NYISO do not support expansion of the scope of the SAR.</b></p> <p><b>Response:</b>  <b>IRO-006</b> The commenter is correct that the TOP is not in IRO-006.</p> <p><b>TOP-002-2</b>  The debate regarding the removal of given requirements will be part of the standards development process. The direction and</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>philosophy of the Industry will be decided by the comments and responses to the standards. The Industry will decide whether or not to retain TOP-002-2 <b>R8</b>. The comments and responses will decide whether or not the measures associated with are appropriate. The question posed by the DT is whether or not to have the debate, and your comments show that there is such a need.</p> <p>Regarding R14 and R15, the SAR DT does not add or remove anything; and in fact the Standards Drafting Team does not add or remove anything. The voters decide what gets included and what gets excluded. The SAR DT has proposed a scope of standards to be addressed for the purpose of eliminating redundancies and removing non-standards. The voters decide which standards / requirements get modified or changed.</p> <p><b>SOLs</b> The issue of whether or not there is a need for a standard that SOLs should be monitored is proposed. If the voters agree they will eliminate the requirement and if they want to keep it they will retain the requirements. The SAR DT wants to have the debate whether or not NY and NE agree, SARs are scoping documents designed to request changes. Once approved the SAR is the starting point for debates on issues identified by the SAR drafter. NY and NE must participate in the standards process to make their point, rather than avoid the impending required debate.</p>
MISO Stakeholders		<input checked="" type="checkbox"/>	<p>We are concerned that the SAR drafting team did not provide an opportunity to comment on their proposed resolution to the SOL issue identified in Question 2 of the previous draft's comment form. It appears that the drafting team did not adequately address the view expressed by the majority of the commenters. We draw this conclusion from the inconsistency in the determination of what is a consensus and what isn't. For example, the comment form shows that the SAR drafting team wrote: "The SAR drafting team appreciates that the industry is near consensus," in response to comments on Question 1. There were 13 yes votes in support, 6 no votes against and 4 abstentions. In response to question 7, the SAR drafting team wrote: "The consensus is that the industry agrees with the stated purpose of the SAR." There were 14 yes votes indicating support, nine no votes indicating disagreement and no abstentions. Question 2 asked if the commenter agreed that SOLs should be moved into guides or good utility practices. 13 commenters voted no, 6 voted yes and 7 abstained. Given that the drafting team found near consensus on question 1 and consensus on question 7, we question why the drafting team does not view the responses to question 2 as a consensus?</p> <p>We are further troubled by the drafting team's solution to this SOL issue. In the responses, the SAR DT proposes to retain requirements to be aware of SOLs and monitor system conditions related to SOLs. However, there is actually no scope changes that</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>reflect this response in draft 2 of the SAR. Additionally, the drafting team asked only one specific question in the comment form for draft 2. It is unusual to not add the general open ended question that allows the commenter to provide any additional comments. We find this unusual given that the drafting team chose the word propose in their response. Use of this word would tend to invite a response because one is not sure that the proposal is acceptable. If the drafting team had an expectation that the proposal may not be acceptable, why would they not ask if the proposal is acceptable in the comment form? We believe they should have asked specifically if the proposed solution would "bridge the divide" between the commenters and the drafting team. Clearly they are on opposite ends of a spectrum with the SOL issue and one would think it would be prudent to determine if the gap has been narrowed enough before moving on to the standards drafting phase.</p> <p>We also believe that the SAR DT did not follow the Reliability Standards Development Procedure. On page 16, under step 2 is the following paragraph:</p> <p>"The requester, assisted by the SAR drafting team if one is appointed, shall give prompt consideration to written views and objections of all participants. An effort to resolve all expressed objections shall be made and each objector shall be advised of the disposition of the objection and the reasons therefore."</p> <p>It would appear that the SAR DT did not fully resolve expressed objections with removal of SOL requirements and should continue working to do so.</p> <p>We also have the following specific issues with the SAR.</p> <p>R8 in TOP-002-2 should not be eliminated because it is not measurable. The standards drafting team should attempt to modify it so that there is a requirement on maintaining voltage or reactive levels that is measurable. If this is not possible, deletion would then be appropriate. The SAR drafting team should not be making this determination.</p> <p>Because the SAR states that R14 and R15 in TOP-002-2 may be better addressed in other standards, we are concerned that the standards drafting team may delete these requirements under the assumption that another team will add them to another standard. This standard drafting team should not remove these requirements unless</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>they simply are not needed for reliability or are added to another standard in conjunction with the deletion.</p> <p>The SAR drafting team should modify the scope so that all requirements to monitor and control flows within SOLs are not eliminated. While the SAR drafting team points out in their response to the comments that NERC's definition defines an SOL as local, eliminating all requirements to monitor and control to SOLs will be detrimental to reliability. To the extent that an SOL is truly local (i.e. radial load serving line), there is no need for this requirement. However, there are SOLs that may not pose a transmission security problem but could impose a generation adequacy problem on another system if the equipment should become damaged. Imports into another system may then be reduced. Additionally, multiple SOLs occurring on a system may be a sign of an undetected IROL. Clearly there should be an obligation on the part of the TOP and RC to review the situation to rule it out.</p>
<p><b>MISO does not support expanding the scope of the SAR.</b></p> <p><b>Response:</b></p> <p>If MISO Stakeholders believes that there was a blatant disregard for the process they can file a complaint with the NERC Standards Committee.</p> <p>MISO Stakeholders should not be troubled by the SAR DT's "solution" to the SOL issue, because the SAR DT did not provide a solution – they provided a scope of work to address prior industry questions to reduce / eliminate redundancies. If MISO Stakeholders would like to propose SOL standards, again they are free to draft a SAR on SOLs. This was not an SOL SAR.</p> <p><b>TOP-002-2:</b></p> <p>MISO Stakeholders proposes that the Standards DT (not the SAR DT) decide on whether or not to keep R8. The SAR DT thanks MISO Stakeholders for their agreement to keep this requirement within scope.</p> <p>Regarding <b>R14</b> and <b>R15</b> MISO Stakeholders has a position that they want to effect. That is a legitimate position, but the SAR DT cannot ensure that the MISO Stakeholders position will be agreed to in the standards process. MISO Stakeholders has the misconception that the Standards DT will write the final requirements. The Standards DT will not remove any requirements unless the industry approves of removing those requirements.</p> <p>Regarding monitoring requirements, MISO Stakeholders has a position on the requirements and they ask that the SAR DT protect that position. It is not the responsibility of the DT to protect a given company's position. This SAR is a scoping</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>document not a process to ensure any one position. The idea of protecting equipment from damage is a laudable goal but it is not a goal of this SAR. To be a goal of a standard, the term Equipment damage would need to be defined. This DT does not include that concern in its purpose.</p> <p>Regarding Generation adequacy, that is outside the purpose of this SAR. Adequacy will be dealt with in a separate SAR. Here again, there is no reason MISO Stakeholders can not submit its own SAR to address this concern.</p>
American Transmission Co.		<input checked="" type="checkbox"/>	<p>The SDT has not provided any information as to scope of work that will be performed on IRO-004, 005 and 006 in the posted version of the SAR. Therefore ATC does not agree with the expanded scope. The SAR SDT must provide information as to why these standards must be worked on as part of this effort. We request that the SAR SDT provided the necessary information and post a revised version of the SAR for comment.</p> <p>Additional comments:</p> <p>Issue 1: A majority of comments submitted on Question 2 (Initial SAR posting) did not support the SDT proposal to remove SOL requirements from NERC’s Reliability Standards. ATC believes that SOLs are a BES issue and must continue to be part of NERC Reliability Standards. ATC does not agree with the SDT proposed compromise that would limit Reliability Standards to only requiring monitoring of SOL. (Note: The SAR provides little to no justification as to why SOL should be removed from NERC Reliability Standards.)</p> <p>“Question 2 (initial SAR posting): 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?”</p> <p>Issue 2: ATC continues to disagree with the current scope of work. We find that scope of work’s description is overly prescriptive and not complete. It seems that the SAR is attempting to remove requirements that address SOL conditions from NERC standards but that is never specifically stated in the SAR. It’s also import to note that in Appendix B of the SAR no specific request was made to remove SOL from NERC standards. Many of the requests in Appendix B only support clarification and removal of redundant</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
			<p>requirements.</p> <p>It's our position that the effort to remove SOLs from NERC standards will reduce interconnection reliability. Therefore ATC can not support this SAR until a proper scope of work is developed. The scope should be limited to clarifying existing requirements by; removing redundancy, better alignments of requirements to measures and removal/clarification of ambiguous language.</p> <p>Issue 2a:            COM-001 Is currently being worked on in projects 2006-04 &amp; 2006-06            COM-002 Is currently being worked on in projects 2006-06 &amp; 2007-02            IRO-004 Is currently being worked on in project 2007-02            IRO-005 Is currently being worked on in project 2007-02 &amp; 2007-18            IRO-006 Is currently being worked on in project 2006-08</p> <p>Lastly ATC believes that this project should be delayed until the all previously identified efforts have been completed in order to insure an efficient work flow. If this project is moved into the standard development phase five Standards will have parallel efforts on going. Coordination will be extremely difficult if not impossible to manage.</p>
<p><b>ATC does not support expanding the scope.</b></p> <p><b>Response:</b></p> <p>ATC requests a response to why the SAR DT asked to include the subject three standards. Answer: In reviewing a comment received during the last round of comments, it was brought to the DT's attention that there were redundancies in IRO004, 005 and 006. In order to address those redundancies it was necessary to ask the industry if the scope could be expanded. As these three standards have been found acceptable to the majority of the current commenters, the SAR DT will now include them in the scope and will post the new SAR for approval.</p> <p><b>Issue 1.</b> The purpose of the SAR is to remove redundancies, the issue of SOLs is left to the Industry decide by the process. If this particular SAR does not meet ATC's concerns then ATC should submit its own request.</p>			

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

---

Question #1			
Commenter	Yes	No	Comment
			<p>Regarding the question of being prescriptive (which in the next paragraph ATC states we should further limit) - the SAR DT was prescriptive in exactly what is to be in the scope of work. The idea was to ensure that the Standards DT isn't inundated with other people's unrelated issues. ATC states that the scope is incomplete but does not specify how to complete it. Is it a redundancy that was missed or is it an unrelated issue? The SAR simply proposes a scope of work designed primarily to eliminate redundancies. Deletion or changes to existing requirements would occur in the standards drafting process.</p> <p>We agree with ATC that the scope should be focused (i.e., prescriptive) on removing redundancies.</p> <p>For items that are not included in this SAR's scope, ATC is encouraged to submit its own scope of work</p> <p>Regarding <b>Issue 2a</b> – ATC lists a number of standards that are addressed in various other NERC projects. The SAR DT would remind ATC that each standard has more than one requirement. And it is these diverse requirements that each Project is addressing. If there is overlapping requirements then ATC is encouraged to bring that to the attention of NERC Staff.</p> <p><b>Lastly</b>, the SAR DT works at the will of NERC. The DT was assigned to begin its work and complete its scoping document. If ATC does not agree with NERC starting this project, then they should inform the NERC staff and the NERC Standards Committee of their concerns.</p>

**Consideration of Comments on 2nd Draft of SAR for Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03)**

Question #1			
Commenter	Yes	No	Comment
Hydro-Québec TransÉnergie		<input checked="" type="checkbox"/>	<p>Both IRO-006-3 and draft IRO-006-4 have the TOP listed in applicability section. However, neither actually has any requirement in the standard. They simply reference the TOP in the requirements.</p> <p>We think that the scope should not be restricted to only eliminate redundancy in IRO-004, -005 and -006 but should permit other changes in those standards. Hydro-Québec TransÉnergie would probably have some proposition to make because of the characteristics of Québec Interconnexion.</p> <p>The SAR drafting team should modify the scope so that all requirements to monitor and control flows within SOLs are not eliminated. While the SAR drafting team points out in their response to the comments that NERC's definition defines an SOL as local, eliminating all requirements to monitor and control to SOLs will be detrimental to reliability. Multiple SOLs occurring on a system may be a sign of an undetected IROL or, if left unchecked, propagate into an IROL. This was the cause of the August 14<sup>th</sup> blackout. Clearly there should be an obligation on the part of the TOP and RC to monitor and mitigate these limits to prevent such propagation.</p>
<p><b>HQ TransÉnergie does not support expanding the scope.</b></p> <p><b>Response:</b> The commenter is correct that the TOP is not in IRO-006.</p> <p>When the Standards process begins, Hydro Quebec can suggest changes to those standards in scope. And if that is not sufficient Hydro Quebec is encouraged to submit its own SAR.</p> <p>Regarding monitoring requirements, Hydro Quebec has a position on the requirements and they ask that the SAR DT protect that position. It is not the responsibility of the DT to protect a given position. This SAR is simply a scoping document.</p> <p>IRO-005-2 R1 requires the RC to monitor SOLs. Clearly multiple SOLs in different parts of a system can only be coordinated by an RC. At best a TOP can only deal with its own limited subset. That is a current requirement and unless changed through the Reliability Standards Development Procedure, that requirement will remain.</p>			