

# Standards Announcement

## Project 2010-17 Definition of Bulk Electric System

Two Recirculation Ballot Windows Open: Thursday, November 10 – Monday, November 21, 2011

### Now Available

Two recirculation ballot windows are now open for Project 2010-17 Definition of Bulk Electric System (BES). The first is for the definition of Bulk Electric System and the associated Implementation Plan, and the second is for a draft application form titled *Detailed Information to Support an Exception Request* referenced in the proposed Rules of Procedure BES Definition Exception Process. Both recirculation ballots are open through 8 p.m. Eastern on Monday, November 21, 2011.

Since the initial ballot, the drafting team has considered all comments received during the formal comment period and initial ballots of the definition and *Detailed Information to Support an Exception Request* form, and made clarifying modifications to the Bulk Electric System Definition and Implementation Plan in the following areas:

- Clarified the wording in Inclusion I1 to indicate that at least one secondary terminal must be at 100 kV or higher to accommodate multiple terminal transformers.
- Removed the reference to the ERO Statement of Compliance Registry Criteria in Inclusion I2 so that there is no chance of the registry values being changed and affecting the definition prior to resolution of threshold values in Phase 2 of this project.
- Clarified that generators were not part of Inclusion I5 to avoid improperly pulling in small generators.
- Clarified the issue of power flow into the local network in Exclusion E3.b.
- Clarified the compliance obligation date of the revised definition in the Implementation Plan.

The drafting team made the following clarifying modifications to the *Detailed Information to Support an Exception Request* form referenced in the Rules of Procedure Exception Process:

- General – Clarified that it was the intent of the drafting team to allow an entity to submit any data or information that it feels supports the exception request.
- General – Clarified the use of facility versus Element(s).
- Generation Questions:

- Clarified several questions by consistently using ‘generation resource’s’ vs. ‘generator’s’ or ‘generator facility’s’.
- Clarified several questions by clearly identifying reliability-related purposes associated with the generation resources.

In response to industry concerns, the drafting team has provided a detailed explanation of the hierarchy of the BES definition, including the proper application of the Inclusions and Exclusions for the identification of BES Elements (See Consideration of Comments report posted on [project page](#) of the NERC website). Additionally, the drafting team explained the rationale behind the creation of the *Detailed Information to Support an Exception Request* form and the guidance it provides for evaluating a request.

A presentation made in support of the NERC Standards and Compliance Workshop held in Atlanta, GA on October 26 – 30, 2011 provides a detailed explanation of the ‘phased’ project approach to the revision of the BES definition as well as addressing the modifications to the BES definition, the Implementation Plan, and the application form titled *Detailed Information to Support an Exception Request*. The presentation (audio and power-point) is available on the NERC website at the following link: <http://www.nerc.com/page.php?cid=2|247|326>.

Documents associated with this project, including clean and redline copies of the definition, the Implementation Plan, the *Detailed Information to Support an Exception Request* form referenced in the Rules of Procedure Exception Process and the drafting team’s consideration of comments submitted during the parallel formal comment period and initial ballot that ended on October 10, 2011, have been posted on the [project page](#).

### **Instructions for Balloting in the Recirculation Ballots**

In a recirculation ballot, votes are counted by exception. Only members of the ballot pool may cast a ballot; all ballot pool members may change their prior votes. A ballot pool member who failed to cast a ballot during the last ballot window may cast a ballot in the recirculation ballot window. If a ballot pool member does not participate in the recirculation ballot, that member’s last vote cast in the initial ballot that ended on October 10, 2011 will be carried over and will be used to determine if there are sufficient affirmative votes for approval.

Members of the two ballot pools associated with the definition and application form may log in and submit their votes in the recirculation ballots from the following page:  
<https://standards.nerc.net/CurrentBallots.aspx>.

### Next Steps

If the definition and application form achieve ballot pool approval, they will be presented to the Board of Trustees for adoption and subsequently filed with regulators for approval along with the proposed Rules of Procedure additions (Sections 509 and 1703). FERC Orders 743 and 743-A require that the revised definition and an approach to determine exceptions be filed with FERC by January 25, 2012.

The Standards Committee and NERC Board of Trustees have recommended that the drafting team address issues such as generation thresholds in a second phase of this project. This approach will ensure that the drafting team has sufficient time to adequately consider and develop a sound technical basis for an approach, and will allow the drafting team to meet the regulatory deadline in FERC Orders 743 and 743A (filing by January 25, 2012). The drafting team has posted a draft Supplemental Standards Authorization Request (SAR) for information purposes only; the SAR will be posted for comment at a future time.

Additional information about the project, including a Fact Sheet and additional informational documents, has been posted on the [project page](#).

### Background

On November 18, 2010 FERC issued Order 743 (amended by Order 743A) and directed NERC to revise the definition of Bulk Electric System so that the definition encompasses all Elements and Facilities necessary for the reliable operation and planning of the interconnected bulk power system. Additional specificity will reduce ambiguity and establish consistency across all Regions in distinguishing between BES and non-BES Elements and Facilities.

In addition, NERC was directed to develop a process for identifying any Elements or Facilities that should be excluded from the BES. NERC is working to address these directives with two activities – the definition of Bulk Electric System is being revised through the standard development process and a BES Definition Exception Process is being developed as proposed modifications to the Rules of Procedure. The proposed modifications to the Rules of Procedure were posted for a comment period through October 27, 2011.

The work of the BES Definition Exception Process (Rules of Procedure) team has been publicly posted at: [http://www.nerc.com/filez/standards/Rules\\_of\\_Procedure-RF.html](http://www.nerc.com/filez/standards/Rules_of_Procedure-RF.html).

### Standards Development Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. For more information or assistance, please contact Monica Benson at [monica.benson@nerc.net](mailto:monica.benson@nerc.net).

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