

# Consideration of Comments on Initial Ballot Project 2010-17 BES Technical Exceptions

Date of Initial Ballot: September 30 – October 10, 2011

**Summary Consideration:** Many commenters followed instructions and cast their ballot while simply pointing to their detailed comments in the posted comment report. The SDT thanks those commenters as this greatly reduces the administrative workload on the SDT. Those who decided to place comments in the ballot report for the most part echoed comments that had already been seen by the SDT in the posted comment report which was administered first by the SDT. As a result, there were no changes to the definition due to comments received in the ballot report. However, for ease of reference, the changes to the definition made as a result of those comments are repeated here.

The SDT made the following changes to the request form due to industry comments received:

- **General** – Clarified the use of facility versus Element(s).
- **Page 1** – Deleted ‘s’ : List any attached supporting documents and any additional information that is included to support ts the request:
- **Generation - Q1.** Replaced ‘generator’s or generator’s facility’ with ‘generation resource’: What is the MW value of the host Balancing Authority’s most severe single Contingency and what is the generator’s, or generator facility’s generation resource’s, percent of this value?
- **Generation - Q2.** Replaced ‘generator’s or generator’s facility’ with ‘generation resource’: Is the generator or generator facility generation resource used to provide reliability-related Ancillary Services?
- **Generation - Q3.** Replaced ‘generator’s or generator’s facility’ with ‘generation resource’: Is the generator-generation resource designated as a must run unit for reliability?

The SDT feels that it is important to remind the industry that Phase II of this project will begin immediately after the conclusion of Phase I as SDT resources clear up. The same SDT will follow through with Phase II.

The SDT is recommending that this project be moved forward to the recirculation ballot stage.

There were two comments that were repeated multiple times throughout the various documents. The first topic was about how to sort through the definition inclusions and exclusions, i.e., which takes precedence. The SDT offers this guidance on that issue:

The application of the draft 'bright-line' BES definition is a three (3) step process that when appropriately applied will identify the vast majority of BES Elements in a consistent manner that can be applied on a continent-wide basis.

Initially, the BES 'core' definition is used to establish the bright-line of 100 kV, which is the overall demarcation point between BES and non-BES Elements. Additionally, the 'core' definition identifies the Real Power and Reactive Power resources connected at 100 kV or higher as included in the BES. To fully appreciate the scope of the 'core' definition an understanding of the term Element is needed. Element is defined in the NERC Glossary of Terms as:

“Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components. “

Element is basically any electrical device that is associated with the transmission or the generation (generating resources) of electric energy.

Step two (2) provides additional clarification for the purposes of identifying specific Elements that are included through the application of the 'core' definition. The Inclusions address transmission Elements and Real Power and Reactive Power resources with specific criteria to provide for a consistent determination of whether an Element is classified as BES or non-BES.

Step three (3) is to evaluate specific situations for potential exclusion from the BES (classification as non-BES Elements). The exclusion language is written to specifically identify Elements or groups of Elements for potential exclusion from the BES.

Exclusion E1 provides for the exclusion of 'transmission Elements' from radial systems that meet the specific criteria identified in the exclusion language. This does not include the exclusion of Real Power and Reactive Power resources captured by Inclusions I2 – I5. The exclusion (E1) only speaks to the transmission component of the radial system. Similarly, Exclusion E3 (local networks) should be applied in the same manner. Therefore, the only inclusion that Exclusions E1 and E3 supersede is Inclusion I1.

Exclusion E2 provides for the exclusion of the Real Power resources that reside behind the retail meter (on the customer's side) and supersedes inclusion I2.

Exclusion E4 provides for the exclusion of retail customer owned and operated Reactive Power devices and supersedes Inclusion I5.

In the event that the BES definition incorrectly designates an Element as BES that is not necessary for the reliable operation of the interconnected transmission network or an Element as non-BES that is necessary for the reliable operation of the interconnected transmission network, the Rules of Procedure exception process may be utilized on a case-by-case basis to either include or exclude an Element.

The second item is about providing specific guidance on how the information on the exception request form will be used in making decisions on inclusions/exclusions in the exception process. The SDT provides the following information on this item:

The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments. There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel's findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren't shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn't been handled before by either party and there is a great deal of professional experience involved on both the submitter's and the Regional Entity's side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.

Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further,

reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.

Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”

The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.

Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.

If you feel that the drafting team overlooked your comments, 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, Herb Schrayshuen, at 404-446-2560 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Standards Processes Manual: [http://www.nerc.com/docs/standards/sc/Standard\\_Processes\\_Manual\\_Approved\\_May\\_2010.pdf](http://www.nerc.com/docs/standards/sc/Standard_Processes_Manual_Approved_May_2010.pdf).  
**Initial Ballot Consideration of Comments – BES Technical Exception Criteria**

Voter	Entity	Segment	Vote	Comment
Kirit Shah	Ameren Services	1	Negative	Please refer to Ameren comments submitted using the Comment Form.
Andrew Z Puztai	American Transmission Company, LLC	1	Negative	Comments submitted.
Robert Smith	Arizona Public Service Co.	1	Negative	Comments submitted
John Bussman	Associated Electric Cooperative, Inc.	1	Negative	comments posted on comment form
Donald S. Watkins	Bonneville Power Administration	1	Negative	comments submitted for both BES ballots
Christopher L de Graffenried	Consolidated Edison Co. of New York	1	Negative	See Con Edison’s comments on the Technical Principles submitted separately by electronic survey form.
Michael S Crowley	Dominion Virginia Power	1	Negative	Please see Dominion’s submitted comments
Bernard Pelletier	Hydro-Quebec TransEnergie	1	Negative	Please see our comments on the Technical Information to Support BES Exception.
Chris W Bolick	Associated Electric Cooperative, Inc.	3	Negative	Please see comments of Associated Electric Cooperative
Charles Yeung	Southwest Power Pool, Inc.	2	Negative	SPP’s comments on this concurrent ballot/comment period have been submitted and provide support for our Negative vote. In addition, SPP is a member of the IRC SRC and is in support of those comments on this standard. Please refer to these sets of comments for our recommendations.
Kathleen Goodman	ISO New England, Inc.	2	Negative	please refer to detailed comments submitted for this project.

Voter	Entity	Segment	Vote	Comment
Tracy Sliman	Tri-State G & T Association, Inc.	1	Negative	Comments submitted on electronic form.
Rebecca Berdahl	Bonneville Power Administration	3	Negative	Please see BPA's responses on the comment form submitted separately.
Andrew Gallo	City of Austin dba Austin Energy	3	Negative	Austin Energy (AE) has submitted detailed comments on this issue through its official Comment document. Please refer to those comments.
Peter T Yost	Consolidated Edison Co. of New York	3	Negative	Con Edison comments have been submitted separately.
Richard Blumenstock	Consumers Energy	3	Negative	See Consumers Energy's comments on the official submittal form.
Michael F. Gildea	Dominion Resources Services	3	Negative	See Dominion's submitted comments.
Janelle Marriott	Tri-State G & T Association, Inc.	3	Negative	Tri-State G&T Load Serving Entity comments were submitted through the formal electronic comment process.
David Frank Ronk	Consumers Energy	4	Negative	See Comments of Consumers Energy Company
Francis J. Halpin	Bonneville Power Administration	5	Negative	Please see BPA's responses on the comment form submitted separately.
Jeanie Doty	City of Austin dba Austin Energy	5	Negative	Austin Energy (AE) has submitted detailed comments on this issue through its official Comment document. Please refer to those comments.
Willet (Jack) Ng	Consolidated Edison Co. of New York	5	Negative	See Con Edison's comments on the Technical Principles submitted separately by electronic survey form.

Voter	Entity	Segment	Vote	Comment
David C Greyerbiehl	Consumers Energy Company	5	Negative	See Consumers Energy's comments on the official comment submittal forms.
Mike Garton	Dominion Resources, Inc.	5	Negative	See comments filed on this project.
Dan Roethemeyer	Dynegy Inc.	5	Negative	Comments to be submitted with the SERC OC Standards Review Group.
Christopher Schneider	MidAmerican Energy Co.	5	Negative	See the MidAmerican submitted comments. The BES definition needs additional specific inclusion or exclusion provisions that clearly exclude variable resource generation collector circuits rated below 100 kV and generators less than 20 MVA connected to those collector circuits in accordance with the registration criteria.
Mahmood Z. Safi	Omaha Public Power District	5	Negative	See Doug Peterchuck's comments
Glen Reeves	Salt River Project	5	Negative	See comments submitted
Brenda S. Anderson	Bonneville Power Administration	6	Negative	Please see BPA's responses on the comment form submitted separately.
Lisa L Martin	City of Austin dba Austin Energy	6	Negative	Austin Energy (AE) has submitted detailed comments on this issue through its official Comment document. Please refer to those comments.
Nickesha P Carrol	Consolidated Edison Co. of New York	6	Negative	Con Edison comments have been submitted separately.
Louis S. Slade	Dominion Resources, Inc.	6	Negative	See comments submitted by Dominion.
Steven L. Rueckert	Western Electricity Coordinating Council	10	Negative	Comments Submitted

Voter	Entity	Segment	Vote	Comment
Ajay Garg	Hydro One Networks, Inc.	1	Negative	After careful analysis of the proposed documents, Hydro One Networks Inc. is casting a negative vote. We commend the SDT for the effort in facing the challenge. However, we believe that the proposed definition and the exception request criteria still need further work. Some issues need to be resolved before a final approval is granted. Please see our detailed comments as provided in the on-line system.
Anthony E Jablonski	ReliabilityFirst Corporation	10	Affirmative	Comments submitted
Guy V. Zito	Northeast Power Coordinating Council, Inc.	10	Affirmative	NPCC will be submitting comments on behalf of our members through the formal comment process along with suggestions to address those comments.
Bruce Lovelin	Central Lincoln PUD	9	Affirmative	I support the additional comments prepared by Steve Alexanderson of Central Lincoln PUD
Margaret Ryan	Pacific Northwest Generating Cooperative	8	Affirmative	Please see PNGC's separate comment form.
Kevin Querry	FirstEnergy Solutions	6	Affirmative	FirstEnergy supports the proposed technical information to support BES exceptions and offers comments and suggestions through the formal comment period.
Richard L. Montgomery	Florida Municipal Power Agency	6	Affirmative	Please see comments submitted through the formal comments
Thomas Washburn	Florida Municipal Power Pool	6	Affirmative	See FMPA's comments
William D Shultz	Southern Company Generation	5	Affirmative	Comments from Southern Company Generation are being submitted via the electronic comment form found on the project page.
Edward P. Cox	AEP Marketing	6	Affirmative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.



Voter	Entity	Segment	Vote	Comment
Gary Carlson	Michigan Public Power Agency	5	Affirmative	Comments submitted separately
David Schumann	Florida Municipal Power Agency	5	Affirmative	Please see comments submitted through the formal comments
James M Howard	Lakeland Electric	5	Affirmative	Refer to comments from FMPA.
Brock Ondayko	AEP Service Corp.	5	Affirmative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
Aleka K Scott	Pacific Northwest Generating Cooperative	4	Affirmative	Please see PNGC's separate comment form.
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	FirstEnergy supports the proposed technical information to support BES exceptions and offers comments and suggestions through the formal comment period.
Guy Andrews	Georgia System Operations Corporation	4	Affirmative	See electronic comment form submitted by Georgia System Operations Corp
Joseph DePoorter	Madison Gas and Electric Co.	4	Affirmative	Please see the MRO NSRF comments concerning this project.
Bob C. Thomas	Illinois Municipal Electric Agency	4	Affirmative	Illinois Municipal Electric Agency (IMEA) appreciates the SDT's diligence in developing technical information to support the BES Exception process. With its Affirmative vote, IMEA supports and recommends comments submitted by the Transmission Access Policy Study Group.
Shamus J Gamache	Central Lincoln PUD	4	Affirmative	See Central Lincoln PUD comments (CLPUD) Posted by Steve Alexanderson.
John Allen	City Utilities of Springfield,	4	Affirmative	City Utilities of Springfield, Missouri supports the comments from SPP.

Voter	Entity	Segment	Vote	Comment
	Missouri			
Frank Gaffney	Florida Municipal Power Agency	4	Affirmative	Please see comments submitted through the formal comments
Steve Eldrige	Umatilla Electric Cooperative	3	Affirmative	Please see UEC's separate comment form.
Marc Farmer	West Oregon Electric Cooperative, Inc.	3	Affirmative	Please see WOEC's separate comment form.
Ian S Grant	Tennessee Valley Authority	3	Affirmative	My company has submitted comments via the comment form.
Jon Shelby	Northern Lights Inc.	3	Affirmative	Please see NLI's separate comment form.
Ray Ellis	Okanogan County Electric Cooperative, Inc.	3	Affirmative	Please see Okanogan's separate comment form.
John S Bos	Muscatine Power & Water	3	Affirmative	MPW agrees with the comments submitted by the MRO NERC Standards Review Forum (NSRF)
Rick Crinklaw	Lane Electric Cooperative, Inc.	3	Affirmative	Please see LEC's separate comment form.
Michael Henry	Lincoln Electric Cooperative, Inc.	3	Affirmative	Please see Lincoln's separate comment form.
Stephan Kern	FirstEnergy Energy	3	Affirmative	FirstEnergy supports the proposed technical information to support BES exceptions and offers comments and suggestions through the formal comment

Voter	Entity	Segment	Vote	Comment
	Delivery			period.
Joe McKinney	Florida Municipal Power Agency	3	Affirmative	Please see comments submitted through the formal comments
William N. Phinney	Georgia Systems Operations Corporation	3	Affirmative	See electronic comment form from Georgia System Operations Corporation
William Bush	Holland Board of Public Works	3	Affirmative	Please see Holland Board of Public Works' comment form.
Dave Sabala	Douglas Electric Cooperative	3	Affirmative	Please see DEC's separate comment form.
Bryan Case	Fall River Rural Electric Cooperative	3	Affirmative	Please see FREC's separate comment form.
Dave Hagen	Clearwater Power Co.	3	Affirmative	Please see Clearwater's separate comment form.
Roman Gillen	Consumers Power Inc.	3	Affirmative	Please see CPI's separate comment form.
Roger Meader	Coos-Curry Electric Cooperative, Inc	3	Affirmative	Please see CCEC's separate comment form.
Steve Alexanderson	Central Lincoln PUD	3	Affirmative	Comments previously submitted.
Dave Markham	Central Electric Cooperative, Inc. (Redmond, Oregon)	3	Affirmative	Please see Central's separate comment form.

Voter	Entity	Segment	Vote	Comment
Bud Tracy	Blachly-Lane Electric Co-op	3	Affirmative	Please see BLEC's separate comment form.
Rich Salgo	Sierra Pacific Power Co.	1	Affirmative	Comments Submitted
Charles B Manning	Electric Reliability Council of Texas, Inc.	2	Affirmative	ERCOT ISO has joined the IRC SRC comments submitted.
David Thorne	Potomac Electric Power Co.	1	Affirmative	Comments submitted
Richard Burt	Minnkota Power Coop. Inc.	1	Affirmative	While MPC is voting affirmative, we ask that you see the comments submitted by the MRO NERC Standards Review Forum (NSRF).
Gordon Pietsch	Great River Energy	1	Affirmative	Please see MRO NSRF comments
William J Smith	FirstEnergy Corp.	1	Affirmative	FirstEnergy supports the proposed technical information to support BES exceptions and offers comments and suggestions through the formal comment period.
Paul B. Johnson	American Electric Power	1	Affirmative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
Stuart Sloan	Consumers Power Inc.	1	Affirmative	Please see CPI's separate comment form.
<p><b>Response:</b> The SDT thanks you for following the instructions with regard to comments. This greatly reduces the administrative burden for the SDT and will help accelerate the process.</p>				
Paul Morland	Colorado Springs Utilities	1	Negative	Colorado Springs Utilities believes that the proposed Technical Information to Support BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the

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				<p>studies submitted will be overly burdensome on our staff. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable us to understand what is necessary for submitting an exception request.</p> <p>To allow sufficient time to complete this difficult task, we believe that the Detailed Information to Support BES Exceptions Request should not be part of the Phase 1 Bulk Electric System Definition effort, but should be postponed and included in the Phase 2 effort.</p>
<p><b>Response:</b> The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments.</p> <p>There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel's findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren't shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn't been handled before by either</p>				

Voter	Entity	Segment	Vote	Comment
				<p>party and there is a great deal of professional experience involved on both the submitter’s and the Regional Entity’s side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.</p> <p>Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.</p> <p>Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”</p> <p>The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.</p> <p>Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.</p> <p>The SDT is required to submit the exception process as part of the revised definition on January 25, 2012 as specified in Order743.</p>

Voter	Entity	Segment	Vote	Comment
Martyn Turner	Lower Colorado River Authority	1	Negative	<p>1. The SDT has made clarifying changes to the core definition in response to industry comments. Do you agree with these changes? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: X No: Comments:</p> <p>2. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I1 (transformers)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: X Comments: LCRA TSC supports the inclusion of transformers (with both the primary and secondary windings operated at 100-kV or higher) in the BES definition; however, additional clarification is suggested. The term transformers needs to be further defined with respect to function (auto transformers, phase angle regulators, generator step-up transformers, etc.). Similarly, a separate definition for “Transformer” could be developed and included in the NERC Glossary of Terms.</p> <p>3. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I2 (generation) including the reference to the ERO Statement of Compliance Registry Criteria? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: X Comments:</p> <p>4. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I3 (blackstart)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: X No: Comments:</p> <p>5. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I4 (dispersed power)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: X Comments: LCRA TSC suggests consistency between this inclusion criteria and the criteria used in I2 for “generation”.</p>

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				<p>6. The SDT has added specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I5 (reactive resources)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: <input checked="" type="checkbox"/> Comments: This inclusion conflicts with exclusion E4. Which one takes priority?</p> <p>7. The SDT has revised the specific exclusions to the core definition in response to industry comments. Do you agree with Exclusion E1 (radial system)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: <input checked="" type="checkbox"/> Comments: The current wording is unclear with respect to the treatment of normally open switching devices. LCRA TSC suggests the following language to replace the existing language on the note to E1: “Two radial systems connected by a normally open, manually operated switching device, as depicted on prints or one-line diagrams for example, may be considered as radial systems under this exclusion.” The current wording is unclear with respect to “non-retail generation”. The sudden loss of large, radial-supplied load may result in reliability deficiencies. LCRA TSC suggests stating a load level or a load capacity in the exclusion.</p> <p>8. The SDT has revised the specific exclusions to the core definition in response to industry comments. Do you agree with Exclusion E2 (behind-the-meter generation)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: <input checked="" type="checkbox"/> Comments:</p> <p>9. The SDT has revised the specific exclusions to the core definition in response to industry comments. Do you agree with Exclusion E3 (local network)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: <input checked="" type="checkbox"/> No: Comments:</p> <p>10. The SDT has added specific exclusions to the core definition in response to industry comments. Do you agree with Exclusion E4 (reactive resources)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.</p>



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				<p>Yes: No: X Comments: This exclusion conflicts with inclusion item 15. Which one takes priority?</p> <p>11. Are there any other concerns with this definition that haven't been covered in previous questions and comments remembering that the exception criteria are posted separately for comment? Yes: X No: Comments: LCRA TSC supports the direction the standards drafting team taking with this project on the BES Definition and encourages further clarification as noted in these comments for proper application.</p>
<p><b>Response:</b> The SDT directs LCRA to the detailed responses in the regular comment form as these comments are identical to those contained there.</p>				
Greg C. Parent	Manitoba Hydro	3	Negative	<p>Manitoba Hydro strongly disagrees with the proposed 'Detailed Information to Support an Exception Request' document and associated exception process for the following reasons: -It is not clear what elements or situations beyond what is covered in the core definition and associated inclusions and exclusions that the drafting team is hoping to capture through the exception process. Further, it is unclear what the benefit to reliability would be by allowing an impact based exception process given that entities will be extremely unlikely to use the exception process to include elements in the BES. -The exception process will be extremely resource intensive, particularly in the absence of any Industry approved threshold criteria. The costs to properly administer and monitor the process to ensure that impact based modeling is done accurately and that it captures the frequent changes on a dynamic system will occupy a wealth of Industry, NERC and Regional Entity time to the detriment of reliability. -It is not reasonable for industry to approve the exception process without knowing what thresholds are required to demonstrate an element as being part of the BES or not. We are concerned that BES determinations would be subjective and would vary from case to case with the particular staff examining the request. BES elements should be established and agreed upon by Industry, not set by a NERC panel. We understand that the drafting team has made this change in the interests of time, but the impact of the BES definition is too broad for this project to be rushed. -The 2010-17 project goals to increase the clarity of the BES definition and establish a 'bright-line' are compromised by the exception process. Changes and alterations to the BES</p>

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				<p>definition should be approved by Industry through the Standards Under Development Process. An interpretation request or SAR should be developed by an entity if they feel that the core definition and associated exceptions and inclusions should be modified. We ask that NERC requests that FERC re-examines the directive to develop an exception process given that the BES definition, which already includes a list of exceptions, is sufficient to standalone without an associated exception process.</p>
S N Fernando	Manitoba Hydro	5	Negative	<p>Manitoba Hydro strongly disagrees with the proposed ‘Detailed Information to Support an Exception Request’ document and associated exception process for the following reasons: -It is not clear what elements or situations beyond what is covered in the core definition and associated inclusions and exclusions that the drafting team is hoping to capture through the exception process. Further, it is unclear what the benefit to reliability would be by allowing an impact based exception process given that entities will be extremely unlikely to use the exception process to include elements in the BES. -The exception process will be extremely resource intensive, particularly in the absence of any Industry approved threshold criteria. The costs to properly administer and monitor the process to ensure that impact based modeling is done accurately and that it captures the frequent changes on a dynamic system will occupy a wealth of Industry, NERC and Regional Entity time to the detriment of reliability. -It is not reasonable for industry to approve the exception process without knowing what thresholds are required to demonstrate an element as being part of the BES or not. We are concerned that BES determinations would be subjective and would vary from case to case with the particular staff examining the request. BES elements should be established and agreed upon by Industry, not set by a NERC panel. We understand that the drafting team has made this change in the interests of time, but the impact of the BES definition is too broad for this project to be rushed. -The 2010-17 project goals to increase the clarity of the BES definition and establish a ‘bright-line’ are compromised by the exception process. Changes and alterations to the BES definition should be approved by Industry through the Standards Under Development Process. An interpretation request or SAR should be developed by an entity if they feel that the core definition and associated exceptions and inclusions should be modified. We ask that NERC requests that FERC re-examines the</p>

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				directive to develop an exception process given that the BES definition, which already includes a list of exceptions, is sufficient to standalone without an associated exception process.
Daniel Prowse	Manitoba Hydro	6	Negative	<p>Manitoba Hydro strongly disagrees with the proposed ‘Detailed Information to Support an Exception Request’ document and associated exception process for the following reasons: -It is not clear what elements or situations beyond what is covered in the core definition and associated inclusions and exclusions that the drafting team is hoping to capture through the exception process. Further, it is unclear what the benefit to reliability would be by allowing an impact based exception process given that entities will be extremely unlikely to use the exception process to include elements in the BES. -The exception process will be extremely resource intensive, particularly in the absence of any Industry approved threshold criteria. The costs to properly administer and monitor the process to ensure that impact based modeling is done accurately and that it captures the frequent changes on a dynamic system will occupy a wealth of Industry, NERC and Regional Entity time to the detriment of reliability. -It is not reasonable for industry to approve the exception process without knowing what thresholds are required to demonstrate an element as being part of the BES or not. We are concerned that BES determinations would be subjective and would vary from case to case with the particular staff examining the request. BES elements should be established and agreed upon by Industry, not set by a NERC panel. We understand that the drafting team has made this change in the interests of time, but the impact of the BES definition is too broad for this project to be rushed. -The 2010-17 project goals to increase the clarity of the BES definition and establish a ‘bright-line’ are compromised by the exception process. Changes and alterations to the BES definition should be approved by Industry through the Standards Under Development Process. An interpretation request or SAR should be developed by an entity if they feel that the core definition and associated exceptions and inclusions should be modified. We ask that NERC requests that FERC re-examines the directive to develop an exception process given that the BES definition, which already includes a list of exceptions, is sufficient to standalone without an associated exception process.</p>

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Joe D Petaski	Manitoba Hydro	1	Negative	<p>Manitoba Hydro strongly disagrees with the proposed ‘Detailed Information to Support an Exception Request’ document and associated exception process for the following reasons: -It is not clear what elements or situations beyond what is covered in the core definition and associated inclusions and exclusions that the drafting team is hoping to capture through the exception process.</p> <p>Further, it is unclear what the benefit to reliability would be by allowing an impact based exception process given that entities will be extremely unlikely to use the exception process to include elements in the BES. -The exception process will be extremely resource intensive, particularly in the absence of any Industry approved threshold criteria. The costs to properly administer and monitor the process to ensure that impact based modeling is done accurately and that it captures the frequent changes on a dynamic system will occupy a wealth of Industry, NERC and Regional Entity time to the detriment of reliability. -It is not reasonable for industry to approve the exception process without knowing what thresholds are required to demonstrate an element as being part of the BES or not. We are concerned that BES determinations would be subjective and would vary from case to case with the particular staff examining the request. BES elements should be established and agreed upon by Industry, not set by a NERC panel. We understand that the drafting team has made this change in the interests of time, but the impact of the BES definition is too broad for this project to be rushed. -The 2010-17 project goals to increase the clarity of the BES definition and establish a ‘bright-line’ are compromised by the exception process. Changes and alterations to the BES definition should be approved by Industry through the Standards Under Development Process. An interpretation request or SAR should be developed by an entity if they feel that the core definition and associated exceptions and inclusions should be modified. We ask that NERC requests that FERC re-examines the directive to develop an exception process given that the BES definition, which already includes a list of exceptions, is sufficient to standalone without an associated exception process.</p>
Danny Dees	MEAG Power	1	Negative	<p>We believe that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the</p>

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				<p>checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO. We believe that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal or no changes to today’s process under the current definition which includes the language “as defined by the Regional Reliability Organization.” While the proposed Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests. To allow sufficient time to complete this difficult task, we believe that the Detailed Information to Support BES Exceptions Request should not be part of the Phase 1 Bulk Electric System Definition effort, but should be postponed and included in the Phase 2 effort.</p>
Ernest Hahn	Metropolitan Water District of Southern California	1	Negative	<p>MWDSC supports WECC's comments that proposed Technical Information to Support BES Exceptions does not provide the necessary clarity, nor does it provide any criteria for consistency among regions. This detail should be postponed and included in the Phase 2 SAR effort.</p>

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Kevin Smith	Balancing Authority of Northern California	1	Negative	We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Terry L Baker	Platte River Power Authority	3	Negative	Platte River believes that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal changes to today’s process under the current definition which includes the language “as defined by the Regional Reliability Organization.” While the proposed Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests.
Roland Thiel	Platte River Power Authority	5	Negative	Definition of BES Platte River believes that the SDT has made substantial progress towards a clear and workable definition of the BES. Although Platte River ballots “Negative” we strongly support the approach to defining the Bulk Electric System as proposed here. Platte River recognizes that, given the deadlines imposed by FERC in Order No. 743, it will not be possible for the SDT to conduct a technical analysis within the time available. Accordingly, Platte River agrees with the approach taken by the SDT, which is to propose a Phase II of the standards development process that would address the generator threshold level and other issues. However, it is our opinion that the second draft would benefit from further clarification or modification. That said, Platte River is prepared to support the BES definition as proposed by the SDT going forward. Platte River has taken the opportunity to provide this industry feedback, as it is our understanding that we will be afforded another ballot opportunity. If this were to be our sole occasion to ballot, we would vote “Affirmative” at this time. We are encouraged by the work that has been completed and we commend the SDT for their commitment and extensive work thus far. Detailed Information to Support BES Exceptions Requests

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				<p>Platte River believes that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal changes to today’s process under the current definition which includes the language “as defined by the Regional Reliability Organization.” While the proposed Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests.</p>
Carol Ballantine	Platte River Power Authority	6	Negative	<p>Platte River believes that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal changes to today’s process under the current definition which includes the language “as defined by the Regional Reliability Organization.” While the proposed Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests.</p>
John C. Collins	Platte River Power Authority	1	Negative	<p>Platte River believes that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal changes to today’s process under the current definition which includes the language “as defined by the Regional Reliability Organization.” While the proposed Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests.</p>

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Dana Wheelock	Seattle City Light	3	Negative	Comments: Seattle City Light (SCL) believes that the SDT has made substantial progress towards a clear and workable definition of the BES. Although SCL ballots “Negative” we agree with and strongly support the Technical Exceptions Principles as a concept. However, SCL finds that the Principles as written do not provide the necessary clarity as what applying entities must provide to support their request, nor do they provide adequate criteria for consistency among regions in their assessment of requests. SCL recommends the development of objective methods and criteria for identifying which facilities may be excluded from or included in the BES. SCL also recommends the development of one or more examples that illustrate what studies must be submitted and what must be documented as part of an exception request. SCL recognizes that, given the deadlines imposed by FERC in Order No. 743, it will not be possible for the SDT to conduct a technical analysis within the time available. Accordingly, SCL agrees with the approach taken by the SDT, which is to propose a Phase II of the standards development process that would address issues such as the exception process. SCL has taken the opportunity to provide this industry feedback, as it is our understanding that we will be afforded another ballot opportunity. If this were to be our sole occasion to ballot, we would vote “Affirmative” at this time. We are encouraged by the work that has been completed and we commend the SDT for their commitment and extensive work thus far. SCL is prepared to support the BES Exception process as proposed by the SDT going forward.
Hao Li	Seattle City Light	4	Negative	Comments: Seattle City Light (SCL) believes that the SDT has made substantial progress towards a clear and workable definition of the BES. Although SCL ballots “Negative” we agree with and strongly support the Technical Exceptions Principles as a concept. However, SCL finds that the Principles as written do not provide the necessary clarity as what applying entities must provide to support their request, nor do they provide adequate criteria for consistency among regions in their assessment of requests. SCL recommends the development of objective methods and criteria for identifying which facilities may be excluded from or included in the BES. SCL also recommends the development of one or more examples that illustrate what studies must be submitted and what must be documented as part of an exception request. SCL recognizes that, given the deadlines imposed by FERC in Order No. 743, it will not be possible for the SDT to conduct a technical analysis



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Michael J. Haynes	Seattle City Light	5	Negative	<p>Comments: Seattle City Light (SCL) believes that the SDT has made substantial progress towards a clear and workable definition of the BES. Although SCL ballots “Negative” we agree with and strongly support the Technical Exceptions Principles as a concept. However, SCL finds that the Principles as written do not provide the necessary clarity as what applying entities must provide to support their request, nor do they provide adequate criteria for consistency among regions in their assessment of requests. SCL recommends the development of objective methods and criteria for identifying which facilities may be excluded from or included in the BES. SCL also recommends the development of one or more examples that illustrate what studies must be submitted and what must be documented as part of an exception request. SCL recognizes that, given the deadlines imposed by FERC in Order No. 743, it will not be possible for the SDT to conduct a technical analysis within the time available. Accordingly, SCL agrees with the approach taken by the SDT, which is to propose a Phase II of the standards development process that would address issues such as the exception process. SCL has taken the opportunity to provide this industry feedback, as it is our understanding that we will be afforded another ballot opportunity. If this were to be our sole occasion to ballot, we would vote “Affirmative” at this time. We are encouraged by the work that has been completed and we commend the SDT for their commitment and extensive work thus far. SCL is prepared to support the BES Exception process as proposed by the SDT going forward.</p>
Dennis Sismaet	Seattle City Light	6	Negative	<p>Comments: Seattle City Light (SCL) believes that the SDT has made substantial progress towards a clear and workable definition of the BES. Although SCL ballots “Negative” we agree with and strongly support the Technical Exceptions Principles</p>

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				<p>as a concept. However, SCL finds that the Principles as written do not provide the necessary clarity as what applying entities must provide to support their request, nor do they provide adequate criteria for consistency among regions in their assessment of requests. SCL recommends the development of objective methods and criteria for identifying which facilities may be excluded from or included in the BES. SCL also recommends the development of one or more examples that illustrate what studies must be submitted and what must be documented as part of an exception request. SCL recognizes that, given the deadlines imposed by FERC in Order No. 743, it will not be possible for the SDT to conduct a technical analysis within the time available. Accordingly, SCL agrees with the approach taken by the SDT, which is to propose a Phase II of the standards development process that would address issues such as the exception process. SCL has taken the opportunity to provide this industry feedback, as it is our understanding that we will be afforded another ballot opportunity. If this were to be our sole occasion to ballot, we would vote “Affirmative” at this time. We are encouraged by the work that has been completed and we commend the SDT for their commitment and extensive work thus far. SCL is prepared to support the BES Exception process as proposed by the SDT going forward.</p>
Pawel Krupa	Seattle City Light	1	Negative	<p>Comments: Seattle City Light (SCL) believes that the SDT has made substantial progress towards a clear and workable definition of the BES. Although SCL ballots “Negative” we agree with and strongly support the Technical Exceptions Principles as a concept. However, SCL finds that the Principles as written do not provide the necessary clarity as what applying entities must provide to support their request, nor do they provide adequate criteria for consistency among regions in their assessment of requests. SCL recommends the development of objective methods and criteria for identifying which facilities may be excluded from or included in the BES. SCL also recommends the development of one or more examples that illustrate what studies must be submitted and what must be documented as part of an exception request. SCL recognizes that, given the deadlines imposed by FERC in Order No. 743, it will not be possible for the SDT to conduct a technical analysis within the time available. Accordingly, SCL agrees with the approach taken by the SDT, which is to propose a Phase II of the standards development process that would address issues such as the exception process. SCL has taken the opportunity</p>

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Tim Kelley	Sacramento Municipal Utility District	1	Negative	We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Richard K Vine	California ISO	2	Negative	The ISO believes that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. The lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. The ISO believes that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Barbara Constantinescu	Independent Electricity	2	Negative	We believe that the SDT proposed approach for exception criteria is reasonable recognizing that one method/criteria cannot be applicable to everyone and every

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	System Operator			situation within the ERO foot print. However, we believe that there is huge gap and lack of any transparency on how the exception application will be evaluated and processed. We strongly suggest that SDT develop a reference or a guidance document as part of the RoP that should provide some guidance to Registered Entities, Regional Entities and the ERO on how an exception application should be processed. The absence of such guidance will pose a challenge for each entity including the ERO, and may result in discrepancies amongst Regional Entities. The process may be perceived by registered entities as being non-transparency.
Alden Briggs	New Brunswick System Operator	2	Negative	The NBSO has concern about the lack of clarity and specificity with respect to what analyses and study results are required. This lack of clarity and specificity may lead to inconsistent application of the Technical Principles by both Registered Entities and Regional Entities.
Steven Grego	MEAG Power	5	Negative	We believe that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO. We believe that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal or no changes to today's process under the current definition which includes the

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				<p>language “as defined by the Regional Reliability Organization.” While the proposed Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests. To allow sufficient time to complete this difficult task, we believe that the Detailed Information to Support BES Exceptions Request should not be part of the Phase 1 Bulk Electric System Definition effort, but should be postponed and included in the Phase 2 effort.</p>
Steven M. Jackson	Municipal Electric Authority of Georgia	3	Negative	<p>We believe that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO. We believe that a Yes vote for the Technical Principles for Demonstrating BES Exceptions Request will result in minimal or no changes to today’s process under the current definition which includes the language “as defined by the Regional Reliability Organization.” While the proposed</p>

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				Technical Principles for Demonstrating BES Exceptions Request includes a checklist that must be submitted with exception requests, a yes vote will still require each region to develop their own methods and criteria for assessing materials submitted with exemption requests. We believe that a No vote with guidance to the drafting team that objective methods and criteria must be developed and applied continent-wide will result in the desired uniformity and consistency among regions in their assessment of exception requests. To allow sufficient time to complete this difficult task, we believe that the Detailed Information to Support BES Exceptions Request should not be part of the Phase 1 Bulk Electric System Definition effort, but should be postponed and included in the Phase 2 effort.
John H Hagen	Pacific Gas and Electric Company	3	Negative	This does not provide clarity on the criteria that will be used to manage the inclusion/exclusion process. Leaving it up to the regions will only create variances that this effort was chartered to eliminate. To support a bright line BES definition, the exclusion process must not have subjective results based on regional variances. We may be better off without an exclusion process and include the exclusions as written into the definition.
Mike Ramirez	Sacramento Municipal Utility District	4	Negative	We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Bethany Hunter	Sacramento Municipal Utility District	5	Negative	We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Claire Warshaw	Sacramento Municipal Utility District	6	Negative	We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their

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				initial assessment and recommendations to the ERO.
James Leigh-Kendall	Sacramento Municipal Utility District	3	Negative	We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Mark B Thompson	Alberta Electric System Operator	2	Negative	The AESO agrees with the WECC, who say: WECC Staff believes that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Lisa C Rosintoski	Colorado Springs Utilities	6	Negative	Colorado Springs Utilities believes that the proposed Technical Information to Support BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the

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				<p>studies submitted will be overly burdensome on our staff. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable us to understand what is necessary for submitting an exception request. To allow sufficient time to complete this difficult task, we believe that the Detailed Information to Support BES Exceptions Request should not be part of the Phase 1 Bulk Electric System Definition effort, but should be postponed and included in the Phase 2 effort.</p>
Jennifer Eckels	Colorado Springs Utilities	5	Negative	<p>Colorado Springs Utilities believes that the proposed Technical Information to Support BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on our staff. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable us to understand what is necessary for submitting an exception request. To allow sufficient time to complete this difficult task, we believe that the Detailed Information to Support BES Exceptions Request should not be part of the Phase 1 Bulk Electric System Definition effort, but should be postponed and included in the Phase 2 effort.</p>
Spencer Tacke	Modesto Irrigation District	4	Negative	<p>We believe that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and</p>



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				<p>the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO. Thank you.</p>
William M Chamberlain	California Energy Commission	9	Negative	<p>We agree with WECC that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO. We are voting No to allow the drafting team to develop objective methods and criteria that can be applied continent-wide, resulting in the desired uniformity and consistency among regions in their assessment of exception requests.</p>
Allen Mosher	American Public Power Association	4	Affirmative	<p>See comments submitted in response to BES Definition. APPA also requests more specificity on the detailed information required to support BES exceptions processed through the NERC Rules of Procedure drafting process. Additional</p>

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				<p>technical specificity will help ensure consistency between regions and transparency for registered entities on the technical studies and data required to support exception requests. These issues should be addressed in Phase 2.</p>
<p><b>Response:</b> The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments.</p> <p>There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel's findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren't shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn't been handled before by either party and there is a great deal of professional experience involved on both the submitter's and the Regional Entity's side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.</p> <p>Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers</p>				

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<p>the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.</p> <p>Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”</p> <p>The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.</p> <p>Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.</p>				
Marilyn Brown	New York Power Authority	3	Negative	<p>1. Page one of the ‘Detailed Information to Support an Exception Request’ contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Yes: X No: Comments: No comments. 2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there information that you believe needs to be on page two or three that is missing? Please be as specific as possible with your comments. Yes: No: X Comments: For Question 2 on page 2, recommend that the specific types of studies to be provided are defined to add consistency and transparency to the Exception request process. Recommend that the concept and the words “material to” be included as part of</p>

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				<p>the question as follows “Is the facility material to permanent Flowgates in the Eastern Interconnection.....” For Question 4 on page 2, recommend that single contingency analysis be performed and submitted to demonstrate impacts to the BES. For Question 6 on page 3, recommend that “Cranking Path” be removed to be consistent with the draft BES Definition. Recommend that the concept and the words “material to and designated as part of” be included as part of the question. Recommend rewording Question 6 as follows “Is the facility a Blackstart resource material to and designated as part of the Transmission Operator’s restoration plan?” For Question 7 on page 3, facilities less than two years old or under construction would not be able to provide SCADA data for the most recent consecutive two calendar year period. Facility rating changes and the magnitude of such changes which trigger application or reapplication of the exception process are not addressed. Recommend that Question 7 be revised to address these issues. 3. Page four of the ‘Detailed Information to Support an Exception Request’ contains a checklist of items that deal with generation facilities. Do you agree with the information being requested or is there information that you believe needs to be on page four that is missing? Please be as specific as possible with your comments. Yes: No: X Comment Form for 2nd Draft of Project 2010-17: Definition of BES (BES) Technical Principles for Demonstrating BES Exceptions Page 4 of 5 Comments: For Question 2 on page 4, recommend that the specific generator ancillary service products be defined to add consistency and transparency to the Exception Request process. For Question 3 on page 4, recommend that confirmation of must-run generation be provided by the Reliability Coordinator, Reliability Planner, or the Balancing Authority as a clarification to the “appropriate reference”. 4. Do you have concerns about an entity’s ability to obtain the data they would need to file the ‘Detailed Information to Support an Exception Request’? If so, please be specific with your concerns so that the SDT can fully understand the problem. Yes: No: X Comments: No comments. Comment Form for 2nd Draft of Project 2010-17: Definition of BES (BES) Technical Principles for Demonstrating BES Exceptions Page 5 of 5 5. Are there other specific characteristics that you feel would be important for presenting a case and which are generic enough that they belong in the request? If so, please identify them here and provide suggested language that could be added to the document. Yes:</p>

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				<p>No: X Comments: No comments. 6. Are you aware of any conflicts between the proposed approach and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement, or jurisdictional issue? If so, please identify them here and provide suggested language changes that may clarify the issue. Yes: No: X Comments: No comments. 7. Are there any other concerns with the proposed approach for demonstrating BES Exceptions that haven't been covered in previous questions and comments (bearing in mind that the definition itself and the proposed Rules of Procedure changes are posted separately for comments)? Please be as specific as possible with your comments. Yes: X No: Comments: Completing the exception form does not provide the entity with any indication of whether the Exception will be granted or rejected. It would be more effective and efficient to revise the Exception request questions to provide confirmation or rejection after completion of the form. Consistent application of the exception process across regions may become challenging with separate exception request review teams.</p>
Gerald Mannarino	New York Power Authority	5	Negative	<p>Comments: For Question 2 on page 2, recommend that the specific types of studies to be provided are defined to add consistency and transparency to the Exception request process. Recommend that the concept and the words "material to" be included as part of the question as follows "Is the facility material to permanent Flowgates in the Eastern Interconnection....." For Question 4 on page 2, recommend that single contingency analysis be performed and submitted to demonstrate impacts to the BES. For Question 6 on page 3, recommend that "Cranking Path" be removed to be consistent with the draft BES Definition. Recommend that the concept and the words "material to and designated as part of" be included as part of the question. Recommend rewording Question 6 as follows "Is the facility a Blackstart resource material to and designated as part of the Transmission Operator's restoration plan?" For Question 7 on page 3, facilities less than two years old or under construction would not be able to provide SCADA data for the most recent consecutive two calendar year period. Facility rating changes and the magnitude of such changes which trigger application or reapplication of the exception process are not addressed. Recommend that Question 7 be revised to address these issues. Comments: For Question 2 on page 4, recommend that the specific generator ancillary service products be defined to</p>

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				add consistency and transparency to the Exception Request process. For Question 3 on page 4, recommend that confirmation of must-run generation be provided by the Reliability Coordinator, Reliability Planner, or the Balancing Authority as a clarification to the “appropriate reference”.
William Palazzo	New York Power Authority	6	Negative	<p>1. Page one of the ‘Detailed Information to Support an Exception Request’ contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Yes: X No: Comments: No comments.</p> <p>2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there information that you believe needs to be on page two or three that is missing? Please be as specific as possible with your comments. Yes: No: X Comments: For Question 2 on page 2, recommend that the specific types of studies to be provided are defined to add consistency and transparency to the Exception request process. Recommend that the concept and the words “material to” be included as part of the question as follows “Is the facility material to permanent Flowgates in the Eastern Interconnection.....” For Question 4 on page 2, recommend that single contingency analysis be performed and submitted to demonstrate impacts to the BES. For Question 6 on page 3, recommend that “Cranking Path” be removed to be consistent with the draft BES Definition. Recommend that the concept and the words “material to and designated as part of” be included as part of the question. Recommend rewording Question 6 as follows “Is the facility a Blackstart resource material to and designated as part of the Transmission Operator’s restoration plan?” For Question 7 on page 3, facilities less than two years old or under construction would not be able to provide SCADA data for the most recent consecutive two calendar year period. Facility rating changes and the magnitude of such changes which trigger application or reapplication of the exception process are not addressed. Recommend that Question 7 be revised to address these issues.</p> <p>3. Page four of the ‘Detailed Information to Support an Exception Request’ contains a checklist of items that deal with generation facilities. Do you agree with the information being requested or is there information that you believe needs to be on page four that is missing? Please be as specific as possible with your</p>

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Arnold J. Schuff	New York Power Authority	1	Negative	<p>You do not have to answer all questions. Enter all comments in simple text format. Insert a “check” mark in the appropriate boxes by double-clicking the gray areas. 1. Page one of the ‘Detailed Information to Support an Exception Request’ contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Yes: X No: Comments: No comments. 2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there information that you believe needs to be on page two or three that is missing? Please be as specific as possible with your comments. Yes: No: X Comments: For Question 2 on page 2, recommend that the specific types of studies to be provided are defined to add consistency and transparency to the Exception request process. Recommend that the concept and the words “material to” be included as part of the question as follows “Is the facility material to permanent Flowgates in the Eastern Interconnection.....” For Question 4 on page 2, recommend that single contingency analysis be performed and submitted to demonstrate impacts to the BES. For Question 6 on page 3, recommend that “Cranking Path” be removed to be consistent with the draft BES Definition. Recommend that the concept and the words “material to and designated as part of” be included as part of the question. Recommend rewording Question 6 as follows “Is the facility a Blackstart resource material to and designated as part of the Transmission Operator’s restoration</p>

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				<p>plan?”</p> <p>For Question 7 on page 3, facilities less than two years old or under construction would not be able to provide SCADA data for the most recent consecutive two calendar year period. Facility rating changes and the magnitude of such changes which trigger application or reapplication of the exception process are not addressed. Recommend that Question 7 be revised to address these issues.</p> <p>3. Page four of the ‘Detailed Information to Support an Exception Request’ contains a checklist of items that deal with generation facilities. Do you agree with the information being requested or is there information that you believe needs to be on page four that is missing? Please be as specific as possible with your comments. Yes: No: X Comments: For Question 2 on page 4, recommend that the specific generator ancillary service products be defined to add consistency and transparency to the Exception Request process.</p> <p>For Question 3 on page 4, recommend that confirmation of must-run generation be provided by the Reliability Coordinator, Reliability Planner, or the Balancing Authority as a clarification to the “appropriate reference”.</p> <p>4. Do you have concerns about an entity’s ability to obtain the data they would need to file the ‘Detailed Information to Support an Exception Request’? If so, please be specific with your concerns so that the SDT can fully understand the problem. Yes: No: X Comments: No comments.</p> <p>5. Are there other specific characteristics that you feel would be important for presenting a case and which are generic enough that they belong in the request? If so, please identify them here and provide suggested language that could be added to the document. Yes: No: X Comments: No comments.</p> <p>6. Are you aware of any conflicts between the proposed approach and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement, or jurisdictional issue? If so, please identify them here and provide suggested language changes that may clarify the issue. Yes: No: X Comments: No comments.</p> <p>7. Are there any other concerns with the proposed approach for demonstrating BES Exceptions that haven’t been covered in previous questions and comments (bearing in mind that the definition itself and the proposed Rules of Procedure changes are posted separately for comments)? Please be as specific as possible</p>



Voter	Entity	Segment	Vote	Comment
				<p>with your comments. Yes: X No: Comments: Completing the exception form does not provide the entity with any indication of whether the Exception will be granted or rejected. It would be more effective and efficient to revise the Exception request questions to provide confirmation or rejection after completion of the form. Consistent application of the exception process across regions may become challenging with separate exception request review teams.</p>
<p><b>Response:</b> 1. Thank you for your support.</p> <p>2. See response to #10 below. Material is an unmeasurable concept. No change made. The SDT believes that an entity should follow the TPL methodology in formulating its request. If the entity believes that an n-1 analysis is all that is needed then it can submit just an n-1 analysis. No change made. Cranking Path information is just one piece of information that may be of value to the ERO Panel in making its decision. No change made. If two years worth of data are not available, the SDT believes that a Regional Entity will accept what is available and will work with the submitter to come up with an acceptable plan to move forward.</p> <p>3. Ancillary service products differ from region to region so providing a list in the form would be problematic. The form has sufficient flexibility for the entity to specify which products it is dealing with. However, the SDT has clarified the language concerning ancillary service products and must run units to indicate that only reliability-based information is pertinent.</p> <p>Q2. Is the <del>generator or generator facility</del> <u>generation resource</u> used to provide <u>reliability--related</u> Ancillary Services?</p> <p>Q3. Is the <del>generator</del> <u>generation resource</u> designated as a must run unit <u>for reliability</u>?</p> <p>4. 5. &amp; 6. Without a specific comment, the SDT is unable to respond.</p> <p>7. The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments.</p> <p>There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the</p>				

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				<p>ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel’s findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren’t shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn’t been handled before by either party and there is a great deal of professional experience involved on both the submitter’s and the Regional Entity’s side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.</p> <p>Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.</p> <p>Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”</p>

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<p>The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.</p>				
<p>Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.</p>				
Doug Peterchuck	Omaha Public Power District	1	Negative	<p>The technical document on exceptions is appropriate, but there should be a guideline on what a typical exception is. The guideline can easily be created by what is now listed within the four-item "Exclusion List". For example when looking at the current Local Network exclusion (E3), it looks to be based on a regional request and thus is in direct conflict with FERC's order. We interpret the creation of a technical document regarding a proposed BES exclusion as a case that should be examined during the Exception Process and not during the BES definition process. The simple question that FERC could eventually ask is why don't all listed exclusions include a technical justification?</p>
<p><b>Response:</b> The SDT did not provide a technical justification for items that are simply being copied from the existing definition. Technical justification was only provided for items that are new with this revision.</p>				
John T. Underhill	Salt River Project	3	Negative	<p>Definition of Bulk Electric System (BES) The Blackstart "Cranking Path" has been deleted from Inclusion 3 of the BES definition. However, NERC standards EOP-005 and CIP-002, R1.2.4 require documenting the Cranking Path. In addition, CIP-002-4 identifies the Cranking Path as a Critical Asset in Attachment 1. Compliance to the NERC Standards needs to be an exact science whenever possible. SRP does not argue the inclusion or exclusion of Cranking Path. However, if it is excluded, guidance must be provided on whether or not a Cranking Path is subject to the previously mentioned Standards. Detailed Information to Support BES Exceptions Request SRP agrees with the WECC Staff recommendation on the "Detailed Information to Support BES Exceptions Request." "WECC Staff believes that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support</p>

Voter	Entity	Segment	Vote	Comment
				<p>their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.”</p>
Steven J Hulet	Salt River Project	6	Negative	<p>SRP agrees with the WECC Staff recommendation on the “Detailed Information to Support BES Exceptions Request.” “WECC Staff believes that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods</p>

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				and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.”
Robert Kondziolka	Salt River Project	1	Negative	<p>Definition of Bulk Electric System (BES) The Blackstart “Cranking Path” has been deleted from Inclusion 3 of the BES definition. However, NERC standards EOP-005 and CIP-002, R1.2.4 require documenting the Cranking Path. In addition, CIP-002-4 identifies the Cranking Path as a Critical Asset in Attachment 1. Compliance to the NERC Standards needs to be an exact science whenever possible. SRP does not argue the inclusion or exclusion of Cranking Path. However, if it is excluded, guidance must be provided on whether or not a Cranking Path is subject to the previously mentioned Standards.</p> <p>Detailed Information to Support BES Exceptions Request SRP agrees with the WECC Staff recommendation on the “Detailed Information to Support BES Exceptions Request.” “WECC Staff believes that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.”</p>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> Cranking Path information is just one piece of information that may be of value to the ERO Panel in making its decision. No change made.</p> <p>The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments. There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel's findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren't shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn't been handled before by either party and there is a great deal of professional experience involved on both the submitter's and the Regional Entity's side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.</p> <p>Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception</p>				

Voter	Entity	Segment	Vote	Comment
<p>request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.</p> <p>Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”</p> <p>The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.</p> <p>Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.</p>				
Marie Knox	Midwest ISO, Inc.	2	Negative	We support the SDT’s decision to exclude the cranking paths from the BES definition since testing and verification of the use of facilities in the cranking path is already covered by the appropriate EOP standards. However Inclusion I3 (blackstart) is extraneous given there is already designation specific for system restoration covered by an existing standard; EOP-005-2. Therefore, information on whether the facility is part of a Cranking Path associated with a Blackstart Resource, should not be required to receive consideration for an exception.
<p><b>Response:</b> The SDT disagrees that Blackstart Resources should not be included in the BES Definition. The Commission directed NERC to revise its BES definition to ensure that the definition encompasses all facilities necessary for operating an interconnected electric transmission network. The SDT interprets this to include operation under both normal and emergency conditions, which includes situations related to black starts and system restoration. Blackstart Resources have the ability to be started without support from the System or can be energized without</p>				

Voter	Entity	Segment	Vote	Comment
<p>connection to the remainder of the System, in order to meet a Transmission Operator’s restoration plan requirements for Real and Reactive Power capability, frequency, and voltage control. The associated resources of the electric system that can be isolated and then energized to deliver electric power during a restoration event are essential to enable the startup of one or more other generating units as defined in the Transmission Operator’s restoration plan. For these reasons, the SDT continues to include Blackstart Resources indentified in the Transmission Operator’s restoration plan as BES elements. No change made.</p> <p>Cranking Path information is just one piece of information that may be of value to the ERO Panel in making its decision. EOP-005-2 has no relevance in this regard. No change made.</p>				
Linda Jacobson	City of Farmington	3	Negative	FEUS appreciates the efforts of the SDT. However, the Detailed Information to Support an Exception Request does not align with the Draft Appendix 5C as it is applied to ‘Facilities’ rather than ‘Elements’ and is unclear how it is applied for an Inclusion Exception. Additional Comments have been submitted using the comment form.
<p><b>Response:</b> Please see the detailed responses to comments for Farmington in the general consideration of comments document for the technical criteria.</p>				
Gregg R Griffin	City of Green Cove Springs	3	Affirmative	GCS appreciates the SDT’s work on this project. For the most part,GCS supports what it believes to be the intent of the proposed language. The proposed specific exclusion of facilities used in the local distribution of electric energy is appropriate and consistent with Section 215 of the Federal Power Act. However, we have suggestions to better carry out what we believe to be the SDT’s intent. The first sentence can be read as: “... all ... Real Power and Reactive Power resources connected at 100 kV or higher”, which is surely not what the SDT intends. The basic problem is that Inclusions I2 and I4 do not modify the first sentence, e.g., from a set theory perspective, the set described by the first sentence includes the sets described in inclusions I2 and I4; hence, I2 and I4 do not modify the first sentence. From a literal reading, this would cause any size generator connected at 100 kV to be included, which is surely not the intent of the SDT. For similar reasons, the core definition and Inclusion I5 now has the effect of including all generators connected at 100 kV since a generator is a “dynamic device ... supplying or absorbing Reactive Power”. The word “dedicated” in I5 is not sufficient in GCS’s mind to unambiguously exclude generators from this statement. FMPA suggests the following wording to address these issues: "Transmission Elements (not including elements used in the local distribution of electric energy) and Real Power



Voter	Entity	Segment	Vote	Comment
				<p>and Reactive Power resources as described in the list below, unless excluded by Exclusion or Exception: a. Transmission Elements other than transformers and reactive resources operated at 100 kV or higher. b. Transformers with primary and secondary terminals operated at 100 kV or higher. c. Generating resource(s) (with gross individual or gross aggregate nameplate rating per the ERO Statement of Compliance Registry Criteria) including the generator terminals through the high-side of the step-up transformer(s) connected at a voltage of 100 kV or above. d. Blackstart Resources identified in the Transmission Operator’s restoration plan. e. Dispersed power producing resources with aggregate capacity greater than 75 MVA (gross aggregate nameplate rating) utilizing a system designed primarily for aggregating capacity, connected at a common point at a voltage of 100 kV or above, but not including generation on the retail side of the retail meter. f. Non-generator static or dynamic devices dedicated to supplying or absorbing more than 6 MVAR of Reactive Power that are connected at 100 kV or higher, or through a dedicated transformer with a high-side voltage of 100 kV or higher, or through a transformer that is designated in bullet 2 above." 2. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I1 (transformers)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: Yes No: Comments: Please see comments to Question 1 3. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I2 (generation) including the reference to the ERO Statement of Compliance Registry Criteria? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: yes No: Comments: Please see comments to Question 1 4. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I3 (blackstart)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: Yes No: Comments: Please see comments to Question 1. 5. The SDT has revised the specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion I4 (dispersed power)?</p>

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				<p>If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: Yes No: Comments: We recommend clarifying that the dispersed power resources covered by this inclusion do not include generators on the retail side of the retail meter. Specifically, we recommend that the Inclusion read: “Dispersed power producing resources with aggregate capacity greater than 75 MVA (gross aggregate nameplate rating) utilizing a system designed primarily for aggregating capacity, connected at a common point at a voltage of 100kV or above, but not including generation on the retail side of the retail meter.” 6. The SDT has added specific inclusions to the core definition in response to industry comments. Do you agree with Inclusion 15 (reactive resources)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: No: Comments: To help clarify and to avoid inclusion of de minimis reactive resources, we propose a size threshold of 6 MVAR consistent with the smallest size generator included in the BES at a 0.95 power factor, which is a common leading power factor used in Facility Connection Requirements for generators. In other words, 6 MVAR is consistent with typically the least amount of MVAR required to be absorbed by the smallest generator meeting the registry criteria. 7. The SDT has revised the specific exclusions to the core definition in response to industry comments. Do you agree with Exclusion E1 (radial system)? If you do not support this change or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. Yes: Yes No: Comments: FMPA supports the exclusion of radial systems from the BES Definition. Such systems are generally not “necessary for operating an interconnected electric transmission network,” the standard in Orders 743 and 743-A. We have several suggestions to clarify the proposed language for this Exclusion. Proposed Exclusion E1 refers to “[a] group of contiguous transmission Elements that emanates from a single point of connection of 100 kV or higher.” We appreciate the SDT’s clarification of the point of connection requirement, but the term “a single point of connection” should be further defined (more clearly than just by voltage), and should be generic enough to encompass the various bus configurations. It is not the case, for example, that each individual breaker position</p>

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				<p>in a ring bus is a separate point of connection for this purpose; in that situation, a bus at one voltage level at one substation should be considered “a single point of connection.” Some examples of configurations that should be considered a single point of connection for this purpose are at <a href="https://www.frc.com/Standards/StandardDocs/BES/BESAppendixA_V4_clean.pdf">https://www.frc.com/Standards/StandardDocs/BES/BESAppendixA_V4_clean.pdf</a>, Examples 1-6. Although the core definition (appropriately) refers to “Transmission Elements” (with a capital “T”), proposed Exclusion E1 refers to “transmission Elements” (with a lowercase “t”). To avoid confusion, either “Transmission” should be capitalized in both locations, or the word “transmission” should simply be deleted from Exclusion E1, leaving a “group of contiguous Elements.” We understand that the lack of capitalization may have been a deliberate choice by the SDT in an attempt to avoid confusion that SDT members believe exists in the Glossary definition. If the Glossary definition of Transmission is unclear-which GCS does not necessarily believe is the case-the answer is not to simply abandon the Glossary definition in favor of an entirely und</p>
<p><b>Response:</b> Please see the detailed responses to comments for Green Cove in the ballot consideration of comments document for the definition.</p>				
Jose Escamilla	CPS Energy	3	Negative	The sample form "Request for Exception to the Bulk Electric System Definition" developed by the BES ROP Team is a more complete form.
<p><b>Response:</b> The SDT believes that the indicated form was an early draft and is no longer applicable. The SDT has worked closely with the Rules of Procedure team to make certain that the form is coordinated with the proposed ERO Rules of Procedure changes.</p>				
David Kiguel	Hydro One Networks, Inc.	3	Negative	After careful analysis of the proposed documents, Hydro One Networks Inc. is casting a negative vote. We commend the SDT for the effort in facing the challenge. However, we believe that the proposed definition and the exception request criteria still needs further work. Some issues need to be resolved before a final approval is granted. Please see our detailed comments as provided in the on-line system.
<p><b>Response:</b> Please see the detailed responses to comments for Hydro One in the general consideration of comments document for the technical criteria.</p>				
Jack W Savage	Modesto Irrigation	3	Negative	MID is voting No with the following comments. Inclusions and exclusions are based upon the ERO Statement of Compliance Registry Criteria - currently 75MVA. What

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	District			<p>is the SDT's technical justification for using this generation level? If 75MVA is the criteria for including facilities as part of the BES, why is that same criteria not applied at voltages below 100kv? Is 75MVA of generation within an area whose load far exceeds that 75MVA cause to classify that entire area as part of the BES and not exclude it as a Local Network?</p> <p>Why are customer owned generators treated differently than other generators? Where is "non-retail generation" defined?</p> <p>The Detailed Information to Support an Exception Request requests information that is not included or mentioned in the definition of the BES. One example is reference to a Balancing Authorities most severe single contingency outage. How does the SDT justify inclusion of these type of questions which are not supported by the actual definition of the BES?</p>
<p><b>Response:</b> The SDT recognizes that some candidate local networks will have far in excess of 75 MVA of load demand, yet it believes that the 75 MVA threshold value given in Exclusion E3.a is an appropriate level regardless of the amount of load. This value is consistent with the existing threshold of aggregate generation in the ERO Statement of Compliance Registry Criteria. The generation values used in the BES definition will receive more attention and refinement as part of Phase 2 of this Project 2010-17.</p> <p>The SDT assumes the commenter is referring to Exclusion E2. This exclusion is simply clarifying what already exists in the ERO Statement of Compliance Registry Criteria for behind-the-meter generation.</p> <p>Non-retail generation is the generation on the system (supply) side of the meter.</p> <p>The indicated information is simply one piece of data that the SDT felt might be of value in the decision process and does not believe that data requested has to match one for one with the actual language of the definition.</p>				
Jeff Nelson	Springfield Utility Board	3	Negative	<p>Excellent progress has been made, but the technical information to support BES exceptions needs strengthening. For example, unscheduled flows in or out of a local network should not be used as a determination of whether a network is excluded.</p> <p>Reactive devices needs clarification as there are some reactive devices used for power factor correction, for example, on systems above 100kV that SUB believes should be exempt from the BES</p>
<p><b>Response:</b> The SDT believes it is vital to ensure both that power flow is always in the direction from the BES toward the LN at all points of connection, and that the LN facilities not be used for "wheeling" type transactions. The SDT believes the existing language accomplishes this. The suggested language in this comment touches on an important aspect, the scheduled use of the facilities, but the SDT believes that the existing language is more appropriate to express this point. No change made.</p> <p>Special circumstances such as described by SUB will need to be submitted to the exception process. In general, the SDT believes that reactive</p>				

Voter	Entity	Segment	Vote	Comment
<p>devices above 100 kV should be part of the BES.</p>				
Mark Ringhausen	Old Dominion Electric Coop.	4	Negative	I cannot vote for this as it references in I2 the ERO Statement of Compliance Registry Criteria, which can be changed without stakeholder review and approval. The industry would be held to a changing standard that is not included in the Standards itself.
<p><b>Response:</b> This is a factor for the definition and not the criteria. Voting on the two separate issues should be done separately on their own individual merits.                      In response to comments, the SDT has deleted the reference to the ERO Statement of Compliance Registry and replaced it with the existing numeric values. This way, any changes to the ERO Statement of Compliance Registry prior to resolution of threshold values in Phase II will not affect the definition</p>				
Michelle R DAntuono	Occidental Chemical	5	Negative	<p>1. Page 1 of the Detailed Information to Support an Exception Request contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one and is missing? Please be as specific as possible with your comments. No: X Comments: It would be helpful to specify what the “key performance measures of BES reliability” are in the instructions (or at least examples of what these measures are in relation to the TPL Table 1). There must be some guidance on the relative level that should be considered acceptable to exclude a facility. Since the Regional Entities are responsible under the proposed Rules of Procedure to recommend the approval or disapproval of an exception request, it makes sense that they should provide this guidance. However, the DBESSDT should suggest an acceptable minimum - perhaps 10% of the allowed voltage transient dip or frequency excursion as assessed under a single contingency scenario.</p> <p>2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there information that you believe needs to be on page three and is missing? Please be as specific as possible with your comments. No: X Comments: Item 4 needs to be expanded to provide some guidance on what an acceptable “impact to the over-all reliability of the BES” is. Also, there needs to be some sort of qualifier for the request to specify the “most severe system impact of an outage of the facility,” i.e., at least add the</p>

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				<p>qualifier that it only requires a credible scenario. For example, what is the status of the BES when the outage of the facility occurs such that it represents the “most severe impact.” Most Regional Entities have settled on Transmission Planning models and thresholds that any new transmission deployment must minimally meet before it goes online. In some Regions, power transfer distribution factor may be gating factor - others may look at transient response. Whatever the case, the Regions should use those same criteria for BES exceptions - reduced to some conservative percentage level; perhaps 10% of the available margin.</p> <p>3. Page four of the Detailed Information to Support an Exception Request contains a checklist of items that deal with generation facilities. Do you agree with the information being requested or is there information that you believe needs to be on page four and is missing? Please be as specific as possible with your comments. No: X Comments: Item 4 needs to be expanded to provide some guidance on what an acceptable “impact to the over-all reliability of the BES” is. Also, there needs to be some sort of qualifier for the request to specify the “most severe system impact of an outage of the facility,” i.e., at least add the qualifier that it only requires a credible scenario. For example, what is the status of the BES when the outage of the facility occurs such that it represents the “most severe impact.” Most Regional Entities have settled on Transmission Planning models and thresholds that any new generation deployment must minimally meet before it goes online. In some Regions, power transfer distribution factor may be gating factor - others may look at transient response. Whatever the case, the Regions should use those same criteria for BES exceptions - reduced to some conservative percentage level; perhaps 10% of the available margin.</p> <p>4. Do you have concerns about an entity’s ability to obtain the data they would need to file the Detailed Information to Support an Exception Request? If so, please be specific with your concerns so that the SDT can fully understand the problem. Yes: X Comments: Having the data to perform studies of generator outage effects on the BES may require sharing of potentially confidential and/or classified information between the generator and transmission entities. Obviously, “base case” and possibly “N-1” information would need to be shared. Hence, there needs to be some assurance that information will be provided (Possibly in the proposed Appendix 5C of the NERC Rules of Procedure).</p>

Voter	Entity	Segment	Vote	Comment
				<p>5. Are there other specific characteristics that you feel would be important for presenting a case and generic enough that they belong in the request? If so, please identify them here and provide suggested language that could be added to the document. Yes: No: Comments:</p> <p>6. Are you aware of any conflicts between the proposed approach and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement, or jurisdictional issue? If so, please identify them here and provide suggested language changes that may clarify the issue. Yes: X Comments: This Detailed Information to Support an Exemption Request document obviously does not conform to FERC Order 743, Sections 115,116 “NERC should develop an exemption process that includes clear, objective, transparent, and uniformly applicable criteria for exemption of facilities that are not necessary for operating the grid.” The question is will the justification for declining to observe this FERC directive be sufficient. We would assert that is it a lesser consequence for the BES to raise the single generation threshold to 75 MVA than it is to violate this FERC directive by not providing clear, objective, transparent and uniform criteria for the exemption process. We understand that the FERC directive was not well conceived in that if a bright line criteria could be developed for the exemption process, it should be included in the BES Definition itself. However, it leaves the exemption process that FERC had originally conceived non-attainable and causes angst to the industry.</p> <p>7. Are there any other concerns with this approach that haven’t been covered in previous questions and comments bearing in mind that the definition itself and the proposed Rules of Procedure changes are posted separately for comments? Please be as specific as possible with your comments. Yes: No: Comments:</p>
<p><b>Response:</b> 1. 2. &amp; 3. The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments.</p> <p>There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional</p>				

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				<p>discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel's findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren't shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn't been handled before by either party and there is a great deal of professional experience involved on both the submitter's and the Regional Entity's side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.</p> <p>Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.</p>



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<p>Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”</p> <p>The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.</p> <p>Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.</p> <p>4. If confidential data is involved in the submittal, the SDT expects the Regional Entity to work with the submitter to get around this problem.                      5. &amp; 7. Thank you for your response.                      6. The SDT believes the process is in alignment with Order 743 directives as explained above.</p>				
Colin Anderson	Ontario Power Generation Inc.	5	Negative	<p>OPG has cast a negative ballot in the BES Definition poll. Since we disagree with the Definition, and the justification for it, we don't see the need for an exception process. OPG continues to question the need for the changes required (and costs imposed) as a result of the new BES definition. OPG disagrees in general with proceeding to implement a 100 kV brightline definition in the absence of a properly quantified cost/benefit analysis. Entities are being asked to incur a high cost for no demonstrated benefit in wide-area reliability.</p>
<p><b>Response:</b> The SDT understands the concerns raised by the commenters in not receiving hard and fast guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments.</p> <p>There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at</p>				

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				<p>the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel, not to make the final determination. The Regional Entity plays no role in actually approving or rejecting the submittal. It simply acts as an intermediary. One can counter that this places the Regional Entity in a position to effectively block a submittal by being arbitrary as to what information needs to be supplied. In addition, the SDT believes that the visibility of the process would belie such an action by the Regional Entity and also believes that one has to have faith in the integrity of the Regional Entity in such a process. Moreover, Appendix 5C of the proposed NERC Rules of Procedure, Sections 5.1.5, 5.3, and 5.2.4, provide an added level of protection requiring an independent Technical Review Panel assessment where a Regional Entity decides to reject or disapprove an exception request. This panel’s findings become part of the exception request record submitted to NERC. Appendix 5C of the proposed NERC Rules of Procedure, Section 7.0, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request. On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren’t shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn’t been handled before by either party and there is a great deal of professional experience involved on both the submitter’s and the Regional Entity’s side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.</p> <p>Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.</p> <p>Some commenters have asked whether a single ‘yes’ or ‘no’ response to an item on the exception request form will mandate a negative response to the request. To that item, the SDT refers commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.2 of the</p>

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<p>proposed Rules of Procedure that states “No single piece of evidence provided as part of an Exception Request or response to a question will be solely dispositive in the determination of whether an Exception Request shall be approved or disapproved.”</p> <p>The SDT would like to point out several changes made to the specific items in the form that were made in response to industry comments. The SDT believes that these clarifications will make the process tighter and easier to follow and improve the quality of the submittals.</p> <p>Finally, the SDT would point to the draft SAR for Phase II of this project that calls for a review of the process after 12 months of experience. The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem. The SDT asks the commenter to consider all of these facts in making your decision and casting your ballot and hopes that these changes will result in a favorable outcome.</p> <p>The responsibilities assigned to the SDT included the revision of the definition of BES contained in the NERC Glossary of Terms to improve clarity, to reduce ambiguity, and to establish consistency across all Regions in distinguishing between BES and non-BES Elements. The SDT’s efforts are directed at fulfilling their responsibilities and developing a definition that addresses the Commission’s concerns as expressed in the directives contained in Orders No. 743 &amp; 743-A. To accomplish these goals, the SDT has pursued a definition that remains as consistent as possible with the existing definition, while not significantly expanding or contracting the current scope of the BES or driving registration or de-registration. With this in mind, the SDT acknowledges that the current BES definition has varying degrees of Regional application and has resulted in different conclusions on what is currently considered to be part of the BES. This inconsistency in the application and subsequent results were also identified by the Commission in Orders No. 743 &amp; 743-A as a significant concern. The SDT acknowledges that by developing a bright-line definition coupled with the inconsistency in application of the current definition there is a potential for varying degrees of impact on Regions. Without an approved BES definition any assumptions utilized in a cost benefit analysis would be purely speculative and the results would have little meaning in regards to potential improvements in the reliable operation of the interconnected transmission grid on a continent-wide basis. Therefore, the SDT believes that best opportunity to address cost concerns will be through the development of Regional transition plans once the definition has been approved by the Commission.</p>				
Steven Grega	Public Utility District No. 1 of Lewis County	5	Negative	Process should make it easier to prove facility is a non-BES; process should take into account the plant load factor, if the plant is dispatchable and if it critical resource as determine by the BA. Most facilities should be able to prove they are not part of the BES. In WECC, only critical cranking paths are part of BES.
<p><b>Response:</b> The SDT has attempted to make the exception process as easy as possible while still providing the information necessary to properly process a request. Factors such as described by the commenter can be supplied with the submittal as there is no limit or constraint on additional information that can be supplied by the submitter.</p>				

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Larry Nordell	Montana Consumer Counsel	8	Negative	The BES exception process must be cognizant of costs and benefits. In addition to the explicit information required in the current proposal it needs to provide an opportunity for an exception for elements whose failure would have no consequential impacts on the bulk system, and a process for an exception for elements for which the costs inclusion can be shown to be clearly in excess of the benefits of inclusion.
<p><b>Response:</b> The responsibilities assigned to the SDT included the revision of the definition of BES contained in the NERC Glossary of Terms to improve clarity, to reduce ambiguity, and to establish consistency across all Regions in distinguishing between BES and non-BES Elements. The SDT's efforts are directed at fulfilling their responsibilities and developing a definition that addresses the Commission's concerns as expressed in the directives contained in Orders No. 743 &amp; 743-A. To accomplish these goals, the SDT has pursued a definition that remains as consistent as possible with the existing definition, while not significantly expanding or contracting the current scope of the BES or driving registration or de-registration. With this in mind, the SDT acknowledges that the current BES definition has varying degrees of Regional application and has resulted in different conclusions on what is currently considered to be part of the BES. This inconsistency in the application and subsequent results were also identified by the Commission in Orders No. 743 &amp; 743-A as a significant concern. The SDT acknowledges that by developing a bright-line definition coupled with the inconsistency in application of the current definition there is a potential for varying degrees of impact on Regions. Without an approved BES definition any assumptions utilized in a cost benefit analysis would be purely speculative and the results would have little meaning in regards to potential improvements in the reliable operation of the interconnected transmission grid on a continent-wide basis. Therefore, the SDT believes that best opportunity to address cost concerns will be through the development of Regional transition plans once the definition has been approved by the Commission.</p>				
Diane J Barney	National Association of Regulatory Utility Commissioners	9	Negative	The draft definition has a circularity issue with the Registry, lacks clarity in some aspects, and lacks a technical basis and cost/benefit analysis. (See specific comments submitted.)
<p><b>Response:</b> Please see the specific responses provided.</p>				
John D Varnell	Tenaska Power Services Co.	6	Abstain	Which part of this definition has the highest priority inclusions or exclusions.
<p><b>Response:</b> The application of the draft 'bright-line' BES definition is a three (3) step process that when appropriately applied will identify the vast majority of BES Elements in a consistent manner that can be applied on a continent-wide basis.</p> <p>Initially, the BES 'core' definition is used to establish the bright-line of 100 kV, which is the overall demarcation point between BES and non-BES Elements. Additionally, the 'core' definition identifies the Real Power and Reactive Power resources connected at 100 kV or higher as included</p>				

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<p>in the BES. To fully appreciate the scope of the ‘core’ definition an understanding of the term Element is needed. Element is defined in the NERC Glossary of Terms as:</p> <p>“Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components. “</p> <p>Element is basically any electrical device that is associated with the transmission or the generation (generating resources) of electric energy.</p> <p>Step two (2) provides additional clarification for the purposes of identifying specific Elements that are included through the application of the ‘core’ definition. The Inclusions address transmission Elements and Real Power and Reactive Power resources with specific criteria to provide for a consistent determination of whether an Element is classified as BES or non-BES.</p> <p>Step three (3) is to evaluate specific situations for potential exclusion from the BES (classification as non-BES Elements). The exclusion language is written to specifically identify Elements or groups of Elements for potential exclusion from the BES.</p> <p>Exclusion E1 provides for the exclusion of ‘transmission Elements’ from radial systems that meet the specific criteria identified in the exclusion language. This does not include the exclusion of Real Power and Reactive Power resources captured by Inclusions I2 – I5. The exclusion (E1) only speaks to the transmission component of the radial system. Similarly, Exclusion E3 (local networks) should be applied in the same manner. Therefore, the only inclusion that Exclusions E1 and E3 supersede is Inclusion I1.</p> <p>Exclusion E2 provides for the exclusion of the Real Power resources that reside behind the retail meter (on the customer’s side) and supersedes inclusion I2.</p> <p>Exclusion E4 provides for the exclusion of retail customer owned and operated Reactive Power devices and supersedes Inclusion I5.</p> <p>In the event that the BES definition incorrectly designates an Element as BES that is not necessary for the reliable operation of the interconnected transmission network or an Element as non-BES that is necessary for the reliable operation of the interconnected transmission network, the Rules of Procedure exception process may be utilized on a case-by-case basis to either include or exclude an Element.</p>				
Brenda Powell	Constellation Energy Commodities Group	6	Affirmative	While the Technical Principles for BES Exception are acceptable, they are quite complicated. Further simplification may ease the process.

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<p><b>Response:</b> The SDT has attempted to make the exception process as easy as possible while still providing the information necessary to properly process a request.</p>				
Greg Lange	Public Utility District No. 2 of Grant County	3	Affirmative	<p>Public Utility District No. 2 of Grant County (GCPD) agrees that the General Instructions set forth the basic information that would be necessary to support an Exception Request. GCPD is concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. GCPD envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details.</p> <p>GCPD suggests that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.</p> <p>GCPD agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. GCPD suggests three refinements to the questions: (1) Question 2 should be modified by adding “necessary for the operation of the interconnected bulk transmission system” to the end of the question, so that it reads: “Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?” The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter is not.</p>

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				<p>(2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, GCPD suggests modifying question 5 by adding “radial, or Local Network” to the question, so that it would read: “Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load?”</p> <p>(3) For reasons similar to those explained in our response to Question 2, a general “catch-all” question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.</p>
<p><b>Response:</b> The SDT believes that the form allows for the flexibility of an entity supplying any types of diagrams that it believes will support its request. This is a preferable situation to coming up with a hard coded list. No change made.                      The SDT will consider completing a sample form in Phase II.                      The SDT has modified the wording of the question to clarify the intent.</p> <p><b>Q2.</b> Is the <del>generator or generator facility</del> <u>generation resource</u> used to provide <del>reliability--related</del> Ancillary Services?</p> <p>The SDT does not believe that the suggested wording change provides any additional clarification and may even cause confusion. No change made.                      The SDT agrees that any information that might support a request should be allowed and has clarified the wording on page 1 to that effect.</p> <p><b>Page 1 - List any attached supporting documents and any additional information that is included to supports the request:</b></p>				
Jeffrey S Brame	North Carolina Electric Membership Corp.	5	Affirmative	In general, we support the “Detailed Information to Support an Exception Request”. However, we have identified a few concerns that warrant the SDT’s consideration. Q1, Q5 and Q6 in the Transmission Facilities section have a “Description/Comments” section. What type of information should be included

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				<p>under the Description for each of these questions? Providing more guidance here would help achieve the “standardization, clarity and continuity of process” that we seek. Regarding Q2: A permanent flowgate should not be part of the detailed information to support an exception. First, there is no definition for what constitutes a permanent flowgate. Second, flowgates are often created for a myriad of reasons that have nothing to do with them being necessary to operate the BES. While section c) in E3 attempts to limit the applicability to permanent flowgates, there is no definition for what constitutes a permanent flowgate particularly since no flowgate is truly permanent. The NERC Glossary of Terms definition of flowgate includes flowgates in the IDC. This is a problem because flowgates are included in the IDC for many reasons not just because reliability issues are identified. Flowgates could be included to simply study the impact of schedules on a particular interface as an example. It does not mean the interface is critical. As an example, it could be used to generate evidence that there are no transactional impacts to support exclusion from the BES. Furthermore, the list of flowgates in the IDC is dynamic. The master list of IDC flowgates is updated monthly and IDC users can add temporary flowgates at anytime. While the permanent adjective applied to flowgates probably limits the applicability from the “temporary” flowgates, it is not clear which of the monthly flowgates would be included from the IDC since they might be added one month and removed another. In the Transmission Facilities section, we are unclear about what “an appropriate list” in Q3 is supposed to be. Is it supposed to be a list of all IROLs or only those for which the answer is yes? Why is a list even necessary since the answer to the question answers Exclusion E3.c? If the answer to Q3 is no, is this asking the submitter to prove the negative? For Q2 in the Generation Facilities section, the definition of ancillary services varies and can be quite broad. It can include reactive power and voltage support for example. All generators provide some reactive power and voltage support. Thus, ancillary services should be further defined or one could construe it to limit any generator from being excluded. For Q1 in the Generation Facilities section, some generation owners may not be able to obtain their BA’s most severe single Contingency. Many generator owners will not have access to the data necessary to demonstrate the reliability impact to the BES. This is particularly true for transmission dependent utilities.</p>



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Doug White	North Carolina Electric Membership Corp.	3	Affirmative	<p>In general, we support the proposed definition of the BES. However, we have identified a few concerns that warrant the SDT’s consideration. We’d prefer to see the language from the ERO Statement of Compliance Registry Criteria repeated within the BES Definition itself instead of referencing an outside document. As it stands right now, the Compliance Registry Criteria needs to stay intact for Phase I of this project. That makes the Compliance Registry Criteria reliant on the BES Definition and vice versa. We understand that the Statement of Compliance Registry Criteria may be reviewed/revised at the same time Phase 2 of this project is being developed, therefore we agree with Inclusion I2 of this draft.</p> <p>Blackstart Resources can actually be on the distribution system. There is still the question of whether the distribution system would then be subjected to the enforceable standards. If so, there would most likely be a significant cost increase associated with tracking compliance for these distribution systems without a commensurate increase in reliability since Blackstart Resources are rarely used. This could very well cause entities to un-designate Blackstart Resources on distribution systems to avoid these distribution systems from becoming part of the BES. The same rationale that was used for eliminating cranking paths could also be applied to Blackstart Resources.</p> <p>A flowgate should not be used to limit applicability of E3. First, there is no definition for what constitutes a permanent flowgate. Second, flowgates are often created for a myriad of reasons that have nothing to do with them being necessary to operate the BES. While section c) in E3 attempts to limit the applicability to permanent flowgates, there is no definition for what constitutes a permanent flowgate particularly since no flowgate is truly permanent. The NERC Glossary of Terms definition of flowgate includes flowgates in the IDC. This is a problem because flowgates are included in the IDC for many reasons not just because reliability issues are identified. Flowgates could be included to simply study the impact of schedules on a particular interface as an example. It does not mean the interface is critical. As an example, it could be used to generate evidence that there are no transactional impacts to support exclusion from the BES.</p> <p>Furthermore, the list of flowgates in the IDC is dynamic. The master list of IDC flowgates is updated monthly and IDC users can add temporary flowgates at anytime. While the “permanent” adjective applied to flowgates probably limits the</p>

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				<p>applicability from the “temporary” flowgates, it is not clear which of the monthly flowgates would be included from the IDC since they might be added one month and removed another. Flowgates are created for many reasons that have nothing to do with them being necessary to operate the BES. First, flowgates are created to manage congestion. The IDC is more of a congestion management tool than a reliability tool. FERC recognized this in Order 693, when they directed NERC to make clear in IRO-006 that the IDC should not be relied upon to relieve IROLs that have been violated. Rather, other actions such as re-dispatch must be used in conjunction. Second, flowgates are used as a convenient point to calculate flows to sell transmission service. The characteristics of the flowgate make it a good proxy for estimating how much contractual use has been sold not necessarily how much flow will actually occur. While some flowgates definitely are created for reliability issues such as IROLs, many simply are not.</p> <p>The term “non-retail generation” used in Exclusion E1 (item c) and again in E3 (item a) should be clarified (see comments for question 8 below). The Note after item c should also be clarified to indicate that closing a normally open switch doesn’t affect this exclusion.</p> <p>Detailed Information to Support an Exception Request: Vote affirmative with the comments below Comments for Ballot (these may be copied and pasted ): In general, we support the “Detailed Information to Support an Exception Request”. However, we have identified a few concerns that warrant the SDT’s consideration. Q1, Q5 and Q6 in the Transmission Facilities section have a “Description/Comments” section. What type of information should be included under the Description for each of these questions? Providing more guidance here would help achieve the “standardization, clarity and continuity of process” that we seek. Regarding</p> <p>Q2: A permanent flowgate should not be part of the detailed information to support an exception. First, there is no definition for what constitutes a permanent flowgate. Second, flowgates are often created for a myriad of reasons that have nothing to do with them being necessary to operate the BES. While section c) in E3 attempts to limit the applicability to permanent flowgates, there is no definition for what constitutes a permanent flowgate particularly since no flowgate is truly permanent. The NERC Glossary of Terms definition of flowgate includes flowgates</p>

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				<p>in the IDC. This is a problem because flowgates are included in the IDC for many reasons not just because reliability issues are identified. Flowgates could be included to simply study the impact of schedules on a particular interface as an example. It does not mean the interface is critical. As an example, it could be used to generate evidence that there are no transactional impacts to support exclusion from the BES. Furthermore, the list of flowgates in the IDC is dynamic. The master list of IDC flowgates is updated monthly and IDC users can add temporary flowgates at anytime. While the permanent adjective applied to flowgates probably limits the applicability from the “temporary” flowgates, it is not clear which of the monthly flowgates would be included from the IDC since they might be added one month and removed another.</p> <p>In the Transmission Facilities section, we are unclear about what “an appropriate list” in Q3 is supposed to be. Is it supposed to be a list of all IROLs or only those for which the answer is yes? Why is a list even necessary since the answer to the question answers Exclusion E3.c? If the answer to Q3 is no, is this asking the submitter to prove the negative?</p> <p>For Q2 in the Generation Facilities section, the definition of ancillary services varies and can be quite broad. It can include reactive power and voltage support for example. All generators provide some reactive power and voltage support. Thus, ancillary services should be further defined or one could construe it to limit any generator from being excluded.</p> <p>For Q1 in the Generation Facilities section, some generation owners may not be able to obtain their BA’s most severe single Contingency. Many generator owners will not have access to the data necessary to demonstrate the reliability impact to the BES. This is particularly true for transmission dependent utilities.</p>
<p><b>Response:</b> In response to comments, the SDT has deleted the reference to the ERO Statement of Compliance Registry and replaced it with the existing numeric values. This way, any changes to the ERO Statement of Compliance Registry prior to resolution of threshold values in Phase II will not affect the definition.</p> <p>The SDT has determined that it should be conservative with regard to allowing exclusion for radial systems that are depended upon for blackstart functionality, as these will arguably be more important to the reliable operation of the transmission system than equivalent radial systems without blackstart resources. No change made.</p>				

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				<p>The SDT believes that the language in Exclusion E3.c prohibiting “Flowgates” from qualifying for definitional exclusion is appropriate and necessary. As a definitional exclusion characteristic, Exclusion E3.c must follow the principle of being a bright-line and easily identifiable, and as such, the SDT feels that the definition cannot allow some types of Flowgates and disallow others. Flowgates must continue to be a prohibiting characteristic under Exclusion E3, since these facilities are more likely to be used in the transfer of bulk power than not. An entity who wishes to make a case for exclusion of a unique type of Flowgate facility can do so through the exception process. The SDT believes that the continued qualifier of “permanent” associated with the term “Flowgate” addresses the majority of the concern in this comment. No change made.</p> <p>Non-retail generation is meant to be the generation on the system (supply) side of the retail meter.</p> <p>The requesting entity should supply any and all information that it feels will help support its request. No change made.</p> <p>The SDT has modified the wording of the question to clarify the intent.</p> <p><b>Q2.</b> Is the <del>generator or generator facility</del> <u>generation resource</u> used to provide <del>reliability--related</del> Ancillary Services?</p> <p>Any information that an entity believes will support its request should be included. No change made.</p> <p>The SDT believes that the language in Exclusion E3.c prohibiting “Flowgates” from qualifying for definitional exclusion is appropriate and necessary. As a definitional exclusion characteristic, Exclusion E3.c must follow the principle of being a bright-line and easily identifiable, and as such, the SDT feels that the definition cannot allow some types of Flowgates and disallow others. Flowgates must continue to be a prohibiting characteristic under Exclusion E3, since these facilities are more likely to be used in the transfer of bulk power than not. An entity who wishes to make a case for exclusion of a unique type of Flowgate facility can do so through the exception process. The SDT believes that the continued qualifier of “permanent” associated with the term “Flowgate” addresses the majority of the concern in this comment. No change made.</p> <p>The SDT believes that the wording is clear as stated and that the list would be those IROLs that include the Element(s) in question. No change made.</p> <p>The SDT has modified the wording of the question to clarify the intent.</p> <p><b>Q2.</b> Is the <del>generator or generator facility</del> <u>generation resource</u> used to provide <del>reliability--related</del> Ancillary Services?</p> <p>Based on the comments received, the SDT believes that entities will be able to obtain the requisite information necessary to submit a request. However, should an entity have difficulty, they will need to obtain the assistance of their Regional Entity to secure the data. If the entity still can’t obtain the needed data, then the SDT fully expects that entity’s Regional Entity to work with them to come up with a plan that will allow that entity to fill out the request form in a manner that will be acceptable to the Regional Entity so that processing of the request can continue.</p>

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Claston Augustus Sunanon	Orlando Utilities Commission	6	Affirmative	Orlando Utilities Commission supports the new definition, although our support is conditioned on: (1) a workable Exceptions process being developed in conjunction with the BES definition; and, (2) the SDT moving forward expeditiously on Phase II of the standards development process in accordance with the SAR recently put forward by the SDT, which would address a number of important technical issues that have been identified in the standards development process to date.
Brad Chase	Orlando Utilities Commission	1	Affirmative	Orlando Utilities Commission supports the new definition, although our support is conditioned on: (1) a workable Exceptions process being developed in conjunction with the BES definition; and, (2) the SDT moving forward expeditiously on Phase II of the standards development process in accordance with the SAR recently put forward by the SDT, which would address a number of important technical issues that have been identified in the standards development process to date. in addition, phase II should include a clear distinction between the BES and BPS.
Ballard K Mutters	Orlando Utilities Commission	3	Affirmative	Orlando Utilities Commission supports the new definition, although our support is conditioned on: (1) a workable Exceptions process being developed in conjunction with the BES definition; and, (2) the SDT moving forward expeditiously on Phase II of the standards development process in accordance with the SAR recently put forward by the SDT, which would address a number of important technical issues that have been identified in the standards development process to date.
<p><b>Response:</b> The exception process is being worked on in parallel with the definition and will be part of the same filing. Phase II will start up as soon as Phase I is completed and the SDT has the available resources to work on it.</p>				
Noman Lee Williams	Sunflower Electric Power Corporation	1	Affirmative	Q1, Q5 and Q6 in the Transmission Facilities section have a “Description/Comments” section. What type of information should be included under the Description for each of these questions? Providing more guidance here would help achieve the “standardization, clarity and continuity of process” that we seek.  Regarding Q2: A permanent flowgate should not be part of the detailed information to support an exception. First, there is no definition for what constitutes a permanent flowgate. Second, flowgates are often created for a myriad of reasons that have nothing to do with them being necessary to operate the BES. While section c) in E3 attempts to limit the applicability to permanent flowgates, there is no definition for what constitutes a permanent flowgate particularly since no flowgate is truly permanent. The NERC Glossary of Terms

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				<p>definition of flowgate includes flowgates in the IDC. This is a problem because flowgates are included in the IDC for many reasons not just because reliability issues are identified. Flowgates could be included to simply study the impact of schedules on a particular interface as an example. It does not mean the interface is critical. As an example, it could be used to generate evidence that there are no transactional impacts to support exclusion from the BES. Furthermore, the list of flowgates in the IDC is dynamic. The master list of IDC flowgates is updated monthly and IDC users can add temporary flowgates at anytime. While the permanent adjective applied to flowgates probably limits the applicability from the “temporary” flowgates, it is not clear which of the monthly flowgates would be included from the IDC since they might be added one month and removed another. Flowgates are created for many reasons that have nothing to do with them being necessary to operate the BES. First, flowgates are created to manage congestion. The IDC is more of a congestion management tool than a reliability tool. FERC recognized this in Order 693, when they directed NERC to make clear in IRO-006 that the IDC should not be relied upon to relieve IROs that have been violated. Rather, other actions such as re-dispatch must be used in conjunction. Second, flowgates are used as a convenient point to calculate flows to sell transmission service. The characteristics of the flowgate make it a good proxy for estimating how much contractual use has been sold not necessarily how much flow will actually occur. While some flowgates definitely are created for reliability issues such as IROs, many simply are not.</p> <p>In the Transmission Facilities section, we are unclear about what “an appropriate list” in Q3 is supposed to be. Is it supposed to be a list of all IROs or only those for which the answer is yes? Why is a list even necessary since the answer to the question answers Exclusion E3.c? If the answer to Q3 is no, is this asking the submitter to prove the negative?</p> <p>For Q2 in the Generation Facilities section, the definition of ancillary services varies and can be quite broad. It can include reactive power and voltage support for example. All generators provide some reactive power and voltage support. Thus, ancillary services should be further defined or one could construe it to limit any generator from being excluded.</p> <p>For Q1 in the Generation Facilities section, some generation owners may not be</p>

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				able to obtain their BA’s most severe single Contingency. Many generator owners will not have access to the data necessary to demonstrate the reliability impact to the BES. This is particularly true for transmission dependent utilities.
James Jones	Southwest Transmission Cooperative, Inc.	1	Affirmative	<p>In general, we support the “Detailed Information to Support an Exception Request”. However, we have identified a few concerns that warrant the SDT’s consideration. Q1, Q5 and Q6 in the Transmission Facilities section have a “Description/Comments” section. What type of information should be included under the Description for each of these questions? Providing more guidance here would help achieve the “standardization, clarity and continuity of process” that we seek.</p> <p>Regarding Q2: A permanent flowgate should not be part of the detailed information to support an exception. First, there is no definition for what constitutes a permanent flowgate. Second, flowgates are often created for a myriad of reasons that have nothing to do with them being necessary to operate the BES. While section c) in E3 attempts to limit the applicability to permanent flowgates, there is no definition for what constitutes a permanent flowgate particularly since no flowgate is truly permanent. The NERC Glossary of Terms definition of flowgate includes flowgates in the IDC. This is a problem because flowgates are included in the IDC for many reasons not just because reliability issues are identified. Flowgates could be included to simply study the impact of schedules on a particular interface as an example. It does not mean the interface is critical. As an example, it could be used to generate evidence that there are no transactional impacts to support exclusion from the BES. Furthermore, the list of flowgates in the IDC is dynamic. The master list of IDC flowgates is updated monthly and IDC users can add temporary flowgates at anytime. While the permanent adjective applied to flowgates probably limits the applicability from the “temporary” flowgates, it is not clear which of the monthly flowgates would be included from the IDC since they might be added one month and removed another. Flowgates are created for many reasons that have nothing to do with them being necessary to operate the BES. First, flowgates are created to manage congestion. The IDC is more of a congestion management tool than a reliability tool. FERC recognized this in Order 693, when they directed NERC to make clear in IRO-006 that the IDC should not be relied upon to relieve IROLs that have been</p>

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<p><b>Response:</b> Any information that an entity believes will support its request should be included. No change made. The SDT believes that the language in Exclusion E3.c prohibiting “Flowgates” from qualifying for definitional exclusion is appropriate and necessary. As a definitional exclusion characteristic, Exclusion E3.c must follow the principle of being a bright-line and easily identifiable, and as such, the SDT feels that the definition cannot allow some types of Flowgates and disallow others. Flowgates must continue to be a prohibiting characteristic under Exclusion E3, since these facilities are more likely to be used in the transfer of bulk power than not. An entity who wishes to make a case for exclusion of a unique type of Flowgate facility can do so through the exception process. The SDT believes that the continued qualifier of “permanent” associated with the term “Flowgate” addresses the majority of the concern in this comment. No change made. Any information that an entity believes will support its request should be included. No change made. The SDT has modified the wording of the question to clarify the intent.</p> <p><b>Q2.</b> Is the <del>generator or generator facility</del> <u>generation resource</u> used to provide <del>reliability-related</del> <u>Ancillary Services</u>?</p> <p>Based on the comments received, the SDT believes that entities will be able to obtain the requisite information necessary to submit a request.</p>				



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<p>However, should an entity have difficulty, they will need to obtain the assistance of their Regional Entity to secure the data. If the entity still can't obtain the needed data, then the SDT fully expects that entity's Regional Entity to work with them to come up with a plan that will allow that entity to fill out the request form in a manner that will be acceptable to the Regional Entity so that processing of the request can continue.</p>				
Paul Cummings	City of Redding	5	Affirmative	Redding's vote is conditional on the adoption and dedication to Phase 2 of this project.
<p><b>Response:</b> Phase II will begin as soon as Phase I is over and the SDT has the resources available to continue.</p>				
Sam Nietfeld	Snohomish County PUD No. 1	5	Affirmative	<p>Below are SNPD's responses to the NERC comment form for the Definition of the BES (Project 2010-17) Technical Principles for Demonstrating BES Exceptions). SNPD believes the refinements below will clarify the current draft of the BES definition, without hanging the current intent. 1. Page one of the 'Detailed Information to Support an Exception Request' contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Comments: SNPD agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. SNPD is concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. SNPD envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details, such as breaker settings. SNPD suggests that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts. 2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there</p>

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				<p>information that you believe needs to be on page two or three that is missing? Please be as specific as possible with your comments. Comments: SNPD agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest three modifications to the proposed language to ensure consistency with Section 215 of the Federal Power Act, with the BES Definition, and to provide an entity seeking an Exception with the opportunity to submit all relevant information: 1) SNPD suggests that a new question should be added concerning the function of the facility, which would read: "Does the facility function as a local distribution facility rather than a Transmission facility? If yes, please provide a detailed explanation of your answer." Section 215(a)(1) of the FPA makes clear that "facilities used in the local distribution of electric energy" are excluded from the BES, 16 U.S.C. Â§ 824o(a)(1), and the most recent draft of the BES definition incorporates the same language. SNPD believes a question to address the function of the Element or system subject to an Exception Request is necessary to determine whether the Element or system is "used" in local distribution and thereby to ensure that this statutory limit on the BES is observed in the Exceptions process. Further, we believe a variety of information may be relevant to determining whether a particular facility functions as local distribution rather than as part of the BES. For example, if power is not scheduled across the facility or if capacity on the system is not posted on the relevant OASIS, it is likely to function as local distribution, not transmission. Similarly, if power enters the system and is delivered to load within the system rather than moving to load located on another system, its function is local distribution rather than transmission. SNPD proposes the language above as an open-ended question so that the entity submitting the Exceptions Request can provide this and any other information it deems relevant to facility function. 2) SNPD suggests modifying question 6 to "Is the facility part a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. 3) A general</p>

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John D Martinsen	Public Utility District No. 1 of Snohomish County	4	Affirmative	<p>Below are SNPD’s responses to the NERC comment form for the Definition of the BES (Project 2010-17) Technical Principles for Demonstrating BES Exceptions). SNPD believes the refinements below will clarify the current draft of the BES definition, without hanging the current intent. 1. Page one of the ‘Detailed Information to Support an Exception Request’ contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Comments: SNPD agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. SNPD is concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. SNPD envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details, such as breaker settings. SNPD suggests that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts. 2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there</p>

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William T Moojen	Snohomish County PUD No. 1	6	Affirmative	<p>Below are SNPD’s responses to the NERC comment form for the Definition of the BES (Project 2010-17) Technical Principles for Demonstrating BES Exceptions). SNPD believes the refinements below will clarify the current draft of the BES definition, without hanging the current intent. 1. Page one of the ‘Detailed Information to Support an Exception Request’ contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Comments: SNPD agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. SNPD is concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. SNPD envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details, such as breaker settings. SNPD suggests that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts. 2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there</p>

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				<p>generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? 3) For reasons similar to those explained in our response to Question 2, a general “catch-all” question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional in</p>
Long T Duong	Snohomish County PUD No. 1	1	Affirmative	<p>Below are SNPD’s responses to the NERC comment form for the Definition of the BES (Project 2010-17) Technical Principles for Demonstrating BES Exceptions). SNPD believes the refinements below will clarify the current draft of the BES definition, without hanging the current intent. 1. Page one of the ‘Detailed Information to Support an Exception Request’ contains general instructions. Do you agree with the instructions presented or is there information that you believe needs to be on page one that is missing? Please be as specific as possible with your comments. Comments: SNPD agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. SNPD is concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. SNPD envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details, such as breaker settings. SNPD suggests that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts. 2. Pages two and three of the Detailed Information to Support an Exception Request contain a checklist of items that deal with transmission facilities. Do you agree with the information being requested or is there</p>

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				<p>information that you believe needs to be on page two or three that is missing? Please be as specific as possible with your comments. Comments: SNPD agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest three modifications to the proposed language to ensure consistency with Section 215 of the Federal Power Act, with the BES Definition, and to provide an entity seeking an Exception with the opportunity to submit all relevant information: 1) SNPD suggests that a new question should be added concerning the function of the facility, which would read: "Does the facility function as a local distribution facility rather than a Transmission facility? If yes, please provide a detailed explanation of your answer." Section 215(a)(1) of the FPA makes clear that "facilities used in the local distribution of electric energy" are excluded from the BES, 16 U.S.C. Â§ 824o(a)(1), and the most recent draft of the BES definition incorporates the same language. SNPD believes a question to address the function of the Element or system subject to an Exception Request is necessary to determine whether the Element or system is "used" in local distribution and thereby to ensure that this statutory limit on the BES is observed in the Exceptions process. Further, we believe a variety of information may be relevant to determining whether a particular facility functions as local distribution rather than as part of the BES. For example, if power is not scheduled across the facility or if capacity on the system is not posted on the relevant OASIS, it is likely to function as local distribution, not transmission. Similarly, if power enters the system and is delivered to load within the system rather than moving to load located on another system, its function is local distribution rather than transmission. SNPD proposes the language above as an open-ended question so that the entity submitting the Exceptions Request can provide this and any other information it deems relevant to facility function. 2) SNPD suggests modifying question 6 to "Is the facility part a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. 3) A general</p>

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<p><b>Response:</b> Please see the detailed responses to comments for Snohomish in the general consideration of comments document for the technical criteria.</p>				
Harold Taylor	Georgia Transmission Corporation	1	Affirmative	Throughout the document, because it will be part of a larger Exception Request Form, it should, when possible, use terms consistent with the rest of that form (e.g., “Request” rather than “application”). Similarly, defined terms (even if only defined in the context of the Request Form in which these Principles will be used) such as “Exception,” “Request,” “Element” or “Facility” should be capitalized; if the use of lower case is intended to convey a different meaning than what is defined, another term should be used to avoid confusion. The Definition and Request Form generally use the term “Element,” so it is unclear why this document should so consistently use “facility.” For consistency, “Element(s)” or possibly “Element(s) or Facility” should be used.
<p><b>Response:</b> The SDT has attempted to clean up any inconsistencies in terminology.</p>				
Gregory S Miller	Baltimore Gas & Electric Company	1	Affirmative	While the Technical Principles for BES Exception are acceptable, they are quite complicated. Further simplification may ease the process.
<p><b>Response:</b> The SDT would point the commenter to the Phase II draft SAR which contains wording to allow for a review of the principles after a 12 month period of real-world experience.</p>				
Charles A. Freibert	Louisville Gas and Electric Co.	3	Affirmative	LG&E and KU Energy request clarification as to how the two year data requirement would apply to a new facility for which the owner/operator requests an exemption.
<p><b>Response:</b> If two years worth of data are not available, the SDT believes that a Regional Entity will accept what is available and will work with the submitter to come up with an acceptable plan to move forward.</p>				

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Anthony Schacher	Salem Electric	3	Affirmative	Salem Electric is encouraged to see that the standard drafting team understands the reality that in many circumstances many small radially fed utilities have no effect on the bulk electric system. By permitting reasonable and prudent exceptions it will allow many of the small utilities to be able to spend our limited time and resources on the reliability of our systems for our end users, instead of undertaking unnecessary steps to protect a system upon which we have no effect. The exception process is thorough but still manageable for small utilities with limited resources. Salem Electric would like to thank the Standards Drafting Team for their hard work and dedication in defining the Bulk Electric System.
Thomas C Duffy	Central Hudson Gas & Electric Corp.	3	Affirmative	The 'Technical Principles for Demonstrating BES Exceptions' process was intended to establish technical exception 'criteria' which would be used by the industry to understand what facilities would qualify for inclusions and exclusions from the BES. What has been produced, however, is essentially a listing of 'electrical system indicators', identified on the form, which may be material to making a decision regarding, 'is it BES or not'. The thresholds (or acceptable values) for the indicators, however, have not been determined. It is understood that in Phase II of the BES Definition development process, the SDT will attempt to address these issues but until that work has been completed, the industry will remain enmeshed in confusion and inefficient application of resources and funding. Without these criteria, it is very difficult to believe that this process can be transparent and consistent.
Jason Fortik	Lincoln Electric System	3	Affirmative	No comments.
Benjamin Friederichs	Big Bend Electric Cooperative, Inc.	3	Affirmative	These principles seem reasonable.
<p><b>Response:</b> Thank you for your support.</p>				

END OF REPORT