Please **DO NOT** use this form to submit comments on the second draft of the Project 2010-17: Definition of the Bulk Electric System (BES) Exception Criteria. Use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=9995ac42ce2644d9aebc87f58dd166ad) **only** to submit comments on the second draft Exception Criteria. Comments must be submitted by **October 10, 2011.**

If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

### **Background Information**

### **Definition of the BES (Project 2010-17)**

**Technical Principles for Demonstrating BES Exceptions**

In parallel with the definition project, another stakeholder team outside the standards development process has been set up to develop a change to the NERC Rules of Procedure (RoP) to allow for entities to apply for excluding Elements from the BES that might otherwise be included according to the proposed definition and designations. This same process would be used by Registered Entities to justify including Elements in the BES that might otherwise be excluded according to the proposed definition and designations. The RoP team will develop the process for seeking an exception from the definition and designations, but the Definition of the BES Standards Drafting Team (DBESSDT), through the standards development process, has developed the criteria necessary for applying for an exception.

The exception process has been set up as a checklist of items that an entity requesting an exception should supply to the Regional Entity as the first step in the process described in the Rules of Procedure. The same checklist will be utilized for exceptions dealing with inclusions or exclusions. The intent of the SDT is to standardize the types of information that must be supplied when seeking an exception to the extent possible. This will allow for the Regional Entities to process the requests based on standardized evidence and for the ERO to make the eventual decision on the request based on this standardized evidence. This is a significant departure from the first posting on this topic. Based on industry response from that posting and further analysis the SDT has abandoned the initial exclusion criteria and developed this new methodology that it believes will provide more clarity and continuity to the process.  The initial proposal was dependent on a comparison of an entity’s characteristics to a defined value and/or limit.  However, it has become apparent that it is not feasible to establish continent-wide values and/or limits due to differences in operational characteristics.  The new process requires an entity to clarify the characteristics of the facilities in question and to document the operational performance as appropriate through submittal of the Detailed Information to Support an Exception Request along with any other supporting documentation for the exception being sought.  The appropriate Regional Entity will review the submittal to validate information, make a recommendation of whether or not to support the exclusion or inclusion, and then file the request and recommendation with the ERO as established in the Rules of Procedure as presently being drafted and posted for comment. An ERO panel as described in the Rules of Procedure presently being drafted and posted for comment will then make the decision on the exception. At this point, the engineering judgment of the ERO panel will be utilized. Using the request document to dictate the type of supporting material that needs to be supplied plus having a common panel perform the evaluations will result in an open, transparent, and consistent process.

The SDT is seeking industry feedback on the approach being presented. Comments received from this posting will help to determine the final criteria that the industry will be required to adhere to. Therefore, industry feedback is vital to the development process.

It should be noted that the actual application process is described in the Rules of Procedure document that will be posted separately from the exception criteria document.

**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:

No:

Comments:

1. 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:

Comments:

1. 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:

Comments:

1. 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:

Comments:      

1. 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:

Comments:      

1. 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:

Comments:      

1. 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:

No:

Comments: