

Consideration of Comments for SAR to Modify Reliability Coordinator Standards

The SAR to Modify Reliability Coordinator standards requesters thank all commenters who submitted comments on Draft 1 of the SAR. This SAR was posted for a 30-day public comment period from March 19 through April 17, 2007. The requesters asked stakeholders to provide feedback on the SAR through a special SAR Comment Form. There were 19 sets of comments, including comments from 52 different people from more than 40 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on comments received, the drafting team made two changes to the SAR:

- Replaced references to the FERC NOPR with references to the FERC Order 693
- Added a bullet to the detailed description that says, "Improve clarity of, improve measureability of, and remove ambiguity from the requirement" and revised the bullets in the brief description to match this language.

The drafting team is recommending that the Standards Committee authorize moving the SAR forward to the standard drafting stage of the standards process.

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

http://www.nerc.com/~filez/standards/Reliability-Coordination_Project_2006-6.html

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

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

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The Industry Segments are:

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

Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Anita Lee (G1)	AESO		✓										
2.	Ken Goldsmith (G4)	ALT												✓
3.	Jeff Hackman	Ameren Services		✓										
4.	Jason Shaver	American Transmission Co.	✓											
5.	Dave Rudolph (G4)	BEPC												✓
6.	Susan Renne	BPA	✓											
7.	Brent Kingsford (G1)	CAISO		✓										
8.	Greg Tillitson (G5)	CMRC												✓
9.	Ed Thompson (G2)	ConEd	✓											
10.	CJ Ingersoll	Constellation			✓									
11.	Ed Davis	Entergy Services, Inc.	✓											
12.	Steve Myers (G1)	ERCOT		✓										
13.	David Folk	FirstEnergy Corp.	✓		✓		✓	✓						
14.	Joe Knight (G4)	GRE												✓
15.	David Kiguel (G2)	Hydro One Networks	✓											
16.	Roger Champagne (I) (G2)	Hydro-Québec TransÉnergie	✓											
17.	Ron Falsetti (I) (G1) (G2)	IESO		✓										
18.	Matt Goldbert (G1)	ISO-NE		✓										
19.	Kathleen Goodman (I) (G2)	ISO-NE		✓										
20.	William Shemley (G2)	ISO-NE		✓										
21.	Brian F. Thumm	ITC Transco	✓											
22.	Jim Cyrulewski (G3)	JDRJC Associates										✓		
23.	Michael Gammon	Kansas City Power & Light	✓											
24.	Eric Ruskamp (G4)	LES												✓
25.	Donald Nelson (G2)	MA Dept. of Tel. and Energy											✓	
26.	Robert CoisH (I) (G4)	Manitoba Hydro	✓		✓		✓	✓						
27.	William Phillips (G1)	MISO		✓										
28.	Terry Bilke (G3) (G4)	MISO		✓										

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	Commenter	Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
29.	Carol Gerou (G4)	MP											✓
30.	Mike Brytowski (G4)	MRO											✓
31.	Randy Macdonald (G2)	NBSO		✓									
32.	Herb Schrayshuen(G2)	NGRID	✓										
33.	Michael Schiavone (G2)	NGRID	✓										
34.	Michael Rinalli (G2)	NGRID	✓										
35.	Guy V. Zito(G2)	NPCC											✓
36.	Al Boesch (G4)	NPPC											✓
37.	Murale Gopinathan (G2)	NU	✓										
38.	Mike Calimano (I) (G1)	NYISO		✓									
39.	Greg Campoli (G2)	NYISO		✓									
40.	Ralph Rufrano (G2)	NYPA	✓										
41.	Al Adamson (G2)	NYSRC											✓
42.	Todd Gosnell (G4)	OPPD											✓
43.	Alicia Daugherty (G1)	PJM		✓									
44.	Frank McElvain (G5)	RDRC											✓
45.	Charles Yeung (G1)	SPP		✓									
46.	Mike Gentry (I) G5)	SRP	✓										
47.	Jim Haigh (G4)	WAPA											✓
48.	Nancy Bellows (G5)	WECC											✓
49.	Neal Balu (G4)	WPSR											✓
50.	Robert Johnson (G5)	Xcel – PSC											✓
51.	David Lemmons (G3)	Xcel Energy							✓				✓
52.	Pam Oreschnik (G4)	XEL											✓

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

- G1 – IRC Standards Review Committee
- G2 – NPCC CP9 Reliability Standards Working Group (NPCC CP9)
- G3 – Midwest Standards Collaboration Group
- G4 – MRO Members
- G5 – WECC Reliability Coordination Comments Work Group

Index to Questions, Comments, and Responses

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.5

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:8

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project? 12

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach? 14

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here. 18

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1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Summary Consideration: Most stakeholders agreed with the modifications made to reduce the scope of this SAR.

Question #1			
Commenter	Yes	No	Comment
Entergy		<input checked="" type="checkbox"/>	<p>We agree with the reduction of standards to be included in this body of work. However, we suggest PRC-001 should also be eliminated from this SAR.</p> <p>The title of the SAR is Reliability Coordination, but the purpose is to ensure requirements applicable to the Reliability Coordinator are clear, etc., etc. The second part of the Purpose is to ensure that "this set of requirements" is sufficient... , referring back to the first part of the sentence. PRC-001 does not apply to the Reliability Coordinators and is out of place in this SAR.</p> <p>PRC-001 should not be included in this SAR nor the resulting standard development work under this SAR. First, PRC-001 does not apply to Reliability Coordinators and there is already a significantly large amount of work related to Reliability Coordinators under this SAR. Second, the SDT's attention should not be redirected to system protection coordination among BAs, TOPs, and GOPs. We disagree if the intent of the Requestor is to make PRC-001 applicable to Reliability Coordinators under this SAR; If that is the intent we suggest it be done in a separate SAR activity.</p>
<p>Response: Requirement 2.2 in PRC-001 states: If a protective relay or equipment failure reduces system reliability, the Transmission Operator shall notify its Reliability Coordinator and affected Transmission Operators and Balancing Authorities. The Transmission Operator shall take corrective action as soon as possible.</p> <p>This is 'incomplete' because there is no requirement for the RC to use that information. The intent in including PRC-001 in this SAR was to 'complete' this requirement. As envisioned, the new requirement may go in one of the existing RC standards, or may go into a new standard – but because it is something for the RC to do, it seems appropriate to include the consideration of this requirement as part of the RC SAR.</p>			
FirstEnergy		<input checked="" type="checkbox"/>	<p>While IRO-007-1 through IRO-010-1 are currently open for a 30-day comment period until 4/20/07, this standards work plan effort should leave no stone unturned in developing quality standards. Consequently, IRO-007-1 through IRO-010-1 may contain requirements that are valuable and easily consolidated with the standards under review</p>

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Question #1			
Commenter	Yes	No	Comment
			by this SAR. In addition, they may also contain duplicative requirements that could be consolidated as part of the review process of this SAR.
<p>Response: The Implementation Plan posted with IRO-007 through IRO-010 already calls for modification to some of the standards included in this SAR. However, the changes identified with the implementation plan for IRO-007 through IRO-011 are limited to those changes resulting from adoption of the proposed standards. If changes are needed to IRO-007 through IRO-010, they can be addressed with a new SAR.</p>			
Constellation	<input checked="" type="checkbox"/>		CECD feels that given the number of standards that IRO-007-1 and IRO-010-1 may impact [IRO-002-1 R2, IRO-002-1 R6, IRO-003-2, IRO-004-1 R4 and R5, IRO-005-2 R1, TOP-003-0 R1.2, TOP-005-1 R1] CECD disagrees with removing them from consideration. We do agree with the decision to exclude ORG-027-1.
<p>Response: Please review the Implementation Plan posted with IRO-007 through IRO-010. The proposed changes to the list of standards you identified are limited to those changes resulting from adoption of the proposed standards. . If changes are needed to IRO-007 through IRO-010, they can be addressed with a new SAR.</p>			
MRO	<input checked="" type="checkbox"/>		We agree with excluding standards still under development.
<p>Response: Thank you for your support – most commenters agreed with omitting all standards still under development.</p>			
Ameren Services	<input checked="" type="checkbox"/>		
ATC LLC	<input checked="" type="checkbox"/>		
BPA	<input checked="" type="checkbox"/>		
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
ISO-NE	<input checked="" type="checkbox"/>		
ITC Transco	<input checked="" type="checkbox"/>		
KCPL	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
Midwest SCG	<input checked="" type="checkbox"/>		
NPCC CP9 RSWG	<input checked="" type="checkbox"/>		
NYISO	<input checked="" type="checkbox"/>		

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Question #1			
Commenter	Yes	No	Comment
SRP	<input checked="" type="checkbox"/>		
WECC RCCWG	<input checked="" type="checkbox"/>		

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2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:
- Modify the requirement to improve its quality
 - Move the requirement (into another SAR or Standard or to the certification process or standards)
 - Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Summary Consideration: Most stakeholders agreed with this approach to reviewing the requirements in the standards associated with this SAR.

Question #2			
Commenter	Yes	No	Comment
SRP		<input checked="" type="checkbox"/>	The FERC NOPR and FERC Staff comments under Standard PRC-001-0, System Protection Coordination, do not apply to Reliability Coordination. In fact, the current Standard, PRC-001-1, does not apply to Reliability Coordinators. This Standard should be removed from the scope of this SAR.
<p>Response: The FERC NOPR has now been replaced with FERC Order 693 and includes the following language regarding PRC-001-1:</p> <p>1449. The Commission approves Reliability Standard PRC-001-1 as mandatory and enforceable. In addition, the Commission directs the ERO to develop modifications to PRC-001-1 through the Reliability Standards development process that:</p> <p>(1) correct the references for Requirements and</p> <p>(2) include a requirement that upon the detection of failures in relays or protection system elements on the Bulk-Power System that threaten reliable operation, relevant transmission operators must be informed promptly, but within a specified period of time that is developed in the Reliability Standards development process, whereas generator operators must also promptly inform their transmission operators and</p> <p>(3) clarifies that, after being informed of failures in relays or protection system elements that threaten reliability of the Bulk-Power System, transmission operators must carry out corrective control actions, i.e., return a system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes after they receive notice of the failure.</p> <p>The existing PRC-001-1 Requirement 2.2 states:</p> <p>If a protective relay or equipment failure reduces system reliability, the Transmission Operator shall notify its Reliability Coordinator and affected Transmission Operators and Balancing Authorities. The Transmission Operator shall take corrective action as soon as possible.</p>			

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Question #2			
Commenter	Yes	No	Comment
<p>This is 'incomplete' because there is no requirement for the RC to use that information. The intent in including PRC-001 in this SAR was to 'complete' this requirement. As envisioned, the new requirement may go in one of the existing RC standards, or may go into a new standard – but because it is something for the RC to do, it seems appropriate to include the consideration of this requirement as part of the RC SAR.</p>			
Ameren Services Midwest SCG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>We agree with improving the quality of the requirements, removing redundancies and those things that do not contribute to reliability.</p> <p>It isn't clear what stakeholders will be involved to improve these standards. Is it the ballot body as a whole or some other forum? Since there is no drafting team roster, we are not sure who is working on this project and who are the stakeholders suggesting the changes to requirements.</p>
<p>Response: The Reliability Standards Development Procedure will be used to collect stakeholder feedback. If the Standards Committee (SC) accepts this SAR, then the SC can either appoint the existing drafting team to work with stakeholders to make revisions to the standards, or the SC can have the standards staff send a notice to all members of the RBB as well as all entities who have indicated they want to receive email notices of standards actions to let everyone know that the SC is seeking volunteers to work on a new drafting team. In either case, the drafting team will 'propose' revisions and post those for comment. NERC's standards staff will send an email notice to all members of the RBB as well as all entities who have indicated they want to receive email notices of standards actions – the notice will tell people that some proposed revisions have been posted for comment and will seek feedback on the proposed revisions through a comment form – the same process as used to collect feedback on this SAR. The drafting team will use the responses to the questions on the comment form to determine which changes are supported by stakeholders, and will continue to make modifications until the drafting team feels that they have a set of proposed changes that meets the consensus of the stakeholders who participated in the comment periods.</p> <p>The drafting team that is working on the IROL standards submitted this Reliability Coordination SAR – the SC did not assign a separate drafting team to address the SAR comments. The roster for this team is posted on the related files page of the IROL standards. Here is a link to the roster: ftp://www.nerc.com/pub/sys/all_updl/standards/dt/GroupRoster_IROLSDT.pdf</p>			
MRO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>We agree with improving the quality of the requirements, removing redundancies and those things that do not contribute to reliability. We do not see a listing of the drafting team members and it is unclear what stakeholders will be involved to improve these standards.</p>
<p>Response: The Reliability Standards Development Procedure will be used to collect stakeholder feedback. If the Standards Committee (SC) accepts this SAR, then the SC can either appoint the existing drafting team to work with stakeholders to make revisions to the standards, or the SC can have the standards staff send a notice to all members of the RBB as well as all entities who have indicated they want to receive email notices of standards actions to let everyone know that the SC is seeking volunteers to work on a new drafting team. In either case, the drafting team will 'propose' revisions and post those</p>			

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Question #2			
Commenter	Yes	No	Comment
<p>for comment. NERC's standards staff will send an email notice to all members of the RBB as well as all entities who have indicated they want to receive email notices of standards actions – the notice will tell people that some proposed revisions have been posted for comment and will seek feedback on the proposed revisions through a comment form – the same process as used to collect feedback on this SAR. The drafting team will use the responses to the questions on the comment form to determine which changes are supported by stakeholders, and will continue to make modifications until the drafting team feels that they have a set of proposed changes that meets the consensus of the stakeholders who participated in the comment periods.</p> <p>The drafting team that is working on the IROL standards submitted this Reliability Coordination SAR – the SC did not assign a separate drafting team to address the SAR comments. The roster for this team is posted on the related files page of the IROL standards. Here is a link to the roster: ftp://www.nerc.com/pub/sys/all_updl/standards/dt/GroupRoster_IROLSDT.pdf</p>			
FirstEnergy	<input checked="" type="checkbox"/>		Rather than using the word quality to describe the outcome, the first bullet point above should say, "Modify the requirement to improve clarity and measureability while removing ambiguity." This way the drafting team could use a check list against each requirement to test whether it is clear, measureable, and unambiguous.
<p>Response: The drafting team has adopted this suggestion and modified the SAR so that the revised bullet now says: – Modify the requirement to improve its clarity and measureability while removing ambiguity</p>			
Manitoba Hydro	<input checked="" type="checkbox"/>		However, this is a large scope (a large amount of work) for the standard drafting team. Wherever possible, it is recommended that the drafting team list and explain the criteria it is using so that it may be easier to achieve stakeholder consensus where many related changes are made. With such a large scope the drafting team should consider carefully how the changes are balloted so ballots don't fail because stakeholders object to a minor subset of issues in a particular ballot.
<p>Response: Agreed.</p>			
WECC RCCWG	<input checked="" type="checkbox"/>		The WECC RCCWG agrees with the overall approach. That said, there is currently another SAR in process that addresses communications protocols and paths. The referenced SAR, "Operating Personnel Communications Protocols" is also meant to address FERC comments relative to communications protocols. Having two separate SARs that address the same comment seems redundant.
<p>Response: There are a couple of standards that are in more than one 'project' in the Reliability Standards Work Plan 2007-2009. The coordinators working with the drafting teams for these projects are aware of this duplication and will 'hand off' requirements between one another to ensure that each requirement is addressed and that only one drafting team works on modifying each requirement.</p>			
ATC LLC	<input checked="" type="checkbox"/>		
BPA	<input checked="" type="checkbox"/>		

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Question #2			
Commenter	Yes	No	Comment
Constellation	<input checked="" type="checkbox"/>		
Entergy	<input checked="" type="checkbox"/>		
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
ISO-NE	<input checked="" type="checkbox"/>		
ITC Transco	<input checked="" type="checkbox"/>		
KCPL	<input checked="" type="checkbox"/>		
NPCC CP9 RSWG	<input checked="" type="checkbox"/>		
NYISO	<input checked="" type="checkbox"/>		

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3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Summary Consideration: The drafting team made the following modifications to the SAR based on stakeholder suggestions for additional revisions:

- Replaced references to the FERC NOPR with references to the FERC Order 693
- Added a bullet to the detailed description that says, "Improve clarity of, improve measureability of, and remove abiguity from the requirement"

Question #3			
Commenter	Yes	No	Comment
MRO	<input checked="" type="checkbox"/>		<p>The FERC NOPR should not be used to change the standards. Items in the final order should be considered.</p> <p>Several of V0 comments items are not clear. It would help if these fill comments were posted somewhere for reference.</p> <p>We disagree with the assignment of Violation Severity Levels (VSL). VSLs should not be skewed to inflate the sanctions associated with a requirement. The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. The proposed breakdown in the SAR is not part of the Sanctions Guidelines and has not be vetted in the industry.</p>
<p>Response: Agreed. The drafting team has modified the SAR to replace the references to the NOPR with references to FERC Order 693.</p> <p>The Version 0 comments are posted on the Approved Standards web page – here is the link to that set of comments: ftp://www.nerc.com/pub/sys/all_updl/standards/rs/Standards_V0_Industry_Comments_20060105.pdf</p> <p>The proposed breakdown in VSLs was not included in the Sanctions Guidelines – but it was supported by both the Standards Committee and the Compliance and Certification Committee on December 14, 2006. The Stanards Committee supported having drafting teams use the breakdown that appears in the SAR – and that breakdown was included in the Reliability Standards Development Work Plan 2007-2009.</p>			
Ameren Services Midwest SCG	<input checked="" type="checkbox"/>		<p>The FERC NOPR should not be used to change the standards. Items in the final order should be given due consideration.</p> <p>Several of V0 comments items are not clear. They are primarily bullet notes with no context. Is there additional information about these comments somewhere?</p>
<p>Response: Agreed. The drafting team has modified the SAR to replace the references to the NOPR with references to FERC Order 693.</p>			

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Question #3			
Commenter	Yes	No	Comment
The Version 0 comments are posted on the Approved Standards web page – here is the link to that set of comments: ftp://www.nerc.com/pub/sys/all_updl/standards/rs/Standards_V0_Industry_Comments_20060105.pdf			
ATC LLC	<input checked="" type="checkbox"/>		The SAR needs to be further refined to identify those specific requirements that will be: 1) Reviewed as being duplicative 2) Considered being relocated 3) Considered being eliminated
Response: As envisioned, the standard drafting team will work with stakeholders (using the comment process) to propose and obtain stakeholder feedback on whether each requirement should be retired, moved, enhanced, etc.			
FirstEnergy	<input checked="" type="checkbox"/>		Under the detailed description in the second paragraph, the SAR should be modified to include a line item to include "Improve clarity of, improve measureability of, and remove ambiguity from the requirements."
Response: The drafting team adopted your suggestion and added the proposed bullet to the detailed description of the SAR.			
BPA	<input checked="" type="checkbox"/>		No comments at this time. We will comment when the standards are up for comment.
Constellation	<input checked="" type="checkbox"/>		
Entergy		<input checked="" type="checkbox"/>	
Hydro-Québec TransÉnergie		<input checked="" type="checkbox"/>	
IESO		<input checked="" type="checkbox"/>	
IRC SRC		<input checked="" type="checkbox"/>	
ISO-NE		<input checked="" type="checkbox"/>	
ITC Transco		<input checked="" type="checkbox"/>	
KCPL		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
NPCC CP9 RSWG		<input checked="" type="checkbox"/>	
NYISO		<input checked="" type="checkbox"/>	
SRP		<input checked="" type="checkbox"/>	
WECC RCCWG		<input checked="" type="checkbox"/>	

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4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Summary Consideration: Stakeholders who responded to this question overwhelmingly indicated support for having firm boundaries on what could be changed with the associated standards by removing the open-ended language from the original SAR.

Question #4			
Commenter	Yes	No	Comment
BPA		<input checked="" type="checkbox"/>	
FirstEnergy	<input checked="" type="checkbox"/>		This effort should leave no stone unturned in developing quality standards within the expertise and domain of this effort. Therefore, every effort must be made to ensure this round of work plan related standard revisions is as complete and all encompassing as is humanly possible to ensure to the extent possible that this standards process reaches a point that these standards are complete, accurate and only minor revisions are required to maintain them going forward. Tying the hands of the drafting team as suggested by "Several stakeholders" will only prolong the industry's work to achieve good, high quality requirements and standards. In addition, we should be using our resources as efficiently as possible. Allowing some latitude to the drafting teams to find and fix issues with standards that are related to the standards within their area of expertise and charge is a good thing to do at this point in the standards evolution process and conducive to the efficient use of resources. As a practical matter this process may never end, but it should reach a point that is much more manageable sooner rather than later.
Response: Stakeholders overwhelmingly indicated support for having firm boundaries on what could be changed with the associated standards.			
ATC LLC	<input checked="" type="checkbox"/>		The SAR identified standards IRO-014 and IRO-015 on its first page but does not address these standards in Attachment 1. The SAR needs to be updated to either acknowledge that these two standards will not be changed or identify what needs to be corrected. Attachment 1: COM-001-0 NERC has a current effort to address communication facilities in standard EOP-008. This

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Question #4			
Commenter	Yes	No	Comment
			<p>group needs to be aware of that effort and should insure that any change to COM-001 does not counter that effort of EOP-008.</p> <p>How will this effort differ from the other NERC effort?</p> <p>COM-002-1 NERC has a current effort to address communication protocol in emergencies with "Operating Personnel Communications Protocols." Similar to our previous comment this group needs to be aware of that effort and should insure that any change to COM-002 does not counter that groups efforts. How will this effort differ from the other NERC effort?</p> <p>IRO-001-0 Please provide additional information on the following bullet point: "Reflect the process set forth in the NERC Rules of Procedures" What specific sections of NERC Rules of Procedure will be reflected in IRO-001-0?</p> <p>IRO-005-1 The first bullet point does not seem to fall within the goal of this SAR. "Propose that the ERO conduct a survey of IROL practices and experiences." This effort does not need to go through NERC Reliability Standards Development Process to be performed. NERC could take up this effort at any time and it will slow down this process if it is going to be included in this SAR.</p> <p>PER-004-0 NERC has another group that is looking into to these concerns. How will this effort differ from that effort?</p>
<p>Response: The two coordinate operations standards highlighted (IRO-014 and IRO-015), did not have any suggestions from FERC for improvements, and they were not part of Version 0 so there were no suggestions for improvements to these standards from the Version 0 process.</p> <p>COM-001 and COM-002 both contain requirements that are assigned to several different functions – and both include a mix of 'preparedness' requirements as well as some 'real-time' notification requirements as well as some requirements that may end up being converted into a new standard for 'communications protocols'. The intent in including the standards in multiple projects was to ensure that each requirement was fully addressed and ended up where it belonged. The coordinators</p>			

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Question #4			
Commenter	Yes	No	Comment
			<p>supporting these projects are aware of this duplication and are working to ensure that there is a 'hand off' of requirements between teams to eliminate gaps and duplication.</p> <p>IRO-001 In Order 693, FERC explains what it meant by the bullet, 'Reflect the process set forth in the NERC Rules of Procedure':</p> <p style="padding-left: 40px;">896. In the NOPR, the Commission proposed to approve the Reliability Standard as mandatory and enforceable. In addition, as a separate action under section 215(d)(5), the NOPR proposed to direct the ERO to develop modifications to Requirement R1 to substitute "Regional Entity" for "regional reliability organization" and reflect NERC's Rules of Procedure for registering, certifying and verifying entities, including reliability coordinators.</p> <p>IRO-005-1 The bullet point you've highlighted may or may not be addressed by the drafting team. As envisioned, the results of a survey may prove useful in determining a need for additional modifications to the standards. Note that FERC Order 693 has replaced the NOPR and the SAR has been updated to reflect this. The survey is still identified in Order 693 – and FERC clarified that the intent of the survey is to determine if additional modifications to IRO-005 are necessary.</p> <p>PER-004 includes a mix of preparation and real-time requirements. The intent in placing the standard in more than one project is to ensure that each requirement is reviewed by an appropriate team, and that all requirements that are needed end up in an appropriate standard.</p>
Ameren Services	<input checked="" type="checkbox"/>		
Constellation	<input checked="" type="checkbox"/>		
Entergy	<input checked="" type="checkbox"/>		
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
ISO-NE	<input checked="" type="checkbox"/>		
ITC Transco	<input checked="" type="checkbox"/>		
KCPL	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		

Consideration of Comments for SAR to Modify Reliability Coordinator Standards

Question #4			
Commenter	Yes	No	Comment
Midwest SCG	<input checked="" type="checkbox"/>		
MRO	<input checked="" type="checkbox"/>		
NPCC CP9 RSWG	<input checked="" type="checkbox"/>		
NYISO	<input checked="" type="checkbox"/>		
WECC RCCWG	<input checked="" type="checkbox"/>		

Consideration of Comments for SAR to Modify Reliability Coordinator Standards

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

Summary Consideration: The drafting team did not make any conforming changes to the SAR based on comments provided in response to question 5.

Question #5			
Commenter	Yes	No	Comment
Ameren Services			<p>We disagree with the assignment of Violation Severity Levels (VSL). The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. Yes/No requirements should not arbitrarily be counted as Severe violations. The proposed VSL breakdown in the SAR is not part of the Sanctions Guidelines and the proposed process has not been vetted in the industry.</p> <p>To the extent that requirements are modified or moved, care should be taken to make sure that the two-way exchange of information between RC and TOP and RC and BA should be preserved.</p>
<p>Response: Violation Severity Levels identify how badly you missed the intent of a requirement – not all requirements lend themselves to 4 different VSLs. The guidelines for determining a VSL are just ‘guidelines’ – however these guidelines were endorsed by the SC and the CCC and the SDT would need a strong reason for not using these guidelines.</p>			
Midwest SCG			<p>We disagree with the assignment of Violation Severity Levels (VSL). The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. Yes/No requirements should not arbitrarily be counted as Severe violations. The proposed VSL breakdown in the SAR is not part of the Sanctions Guidelines and the proposed process has not been vetted in the industry.</p>
<p>Response: Violation Severity Levels identify how badly you missed the intent of a requirement – not all requirements lend themselves to 4 different VSLs. The guidelines for determining a VSL are just ‘guidelines’ – however these guidelines were endorsed by the SC and the CCC and the SDT would need a strong reason for not using these guidelines.</p>			
BPA		<input checked="" type="checkbox"/>	No comments at this time. We will comment when the standards are up for comment.
<p>Response:</p>			
WECC RCCWG			The WECC RCCWG believes that revision to each existing Standard, as a result of this SAR, should be individually balloted, instead of grouped together in one ballot on the entire group of changes.
<p>Response: The SDT appointed to work on the standards will identify how to ballot the standards modified as part of this set of standards.</p>			