

## Consideration of Comments

**Project Name:**

Comment Period Start Date: 10/29/2019

Comment Period End Date: 12/12/2019

Associated Ballots: 2017-07 Standards Alignment with Registration FAC-002-3 IN 1 ST  
2017-07 Standards Alignment with Registration Implementation Plan IN 1 OT  
2017-07 Standards Alignment with Registration IRO-010-3 IN 1 ST  
2017-07 Standards Alignment with Registration MOD-031-3 IN 1 ST  
2017-07 Standards Alignment with Registration MOD-033-2 IN 1 ST  
2017-07 Standards Alignment with Registration NUC-001-4 IN 1 ST  
2017-07 Standards Alignment with Registration PRC-006-4 IN 1 ST  
2017-07 Standards Alignment with Registration TOP-003-4 IN 1 ST

There were 32 sets of responses, including comments from approximately 75 different people from approximately 61 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President of Engineering and Standards, [Howard Gugel](#) (via email) or at (404) 446-9693.

## Questions

1. The SDT approach is to align the FAC-002-2 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

2. The SDT approach is to align the IRO-010-2 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

3. The SDT approach is to align the MOD-031-2 and MOD-033-1 standards with the RBR initiative by changing “Planning Authority” to “Planning Coordinator.” Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

4. The SDT approach is to align the NUC-001-3 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

5. The SDT approach is to align the PRC-006-3 standard with the RBR initiative and the standard is being revised to add “UFLS Only-Distribution Provider” consistent with NERC registration criteria. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

6. The SDT approach is to align the TOP-003-3 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

**7. Please provide any additional comments for the SDT to consider that you have not already provided for Project 2017-07.**

**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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Douglas Webb	Douglas Webb		MRO,SPP RE	Westar-KCPL	Doug Webb	Westar	1,3,5,6	MRO
					Doug Webb	KCP&L	1,3,5,6	MRO
Southern Company - Alabama Power Company	Joel Dembowski	3		Southern Company	Adrienne Collins	Southern Company Services, Inc.	1	SERC
					Bill Shultz	Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company Generation and Energy Marketing	6	SERC
					Joel Dembowski	Alabama Power Company	3	SERC
DTE Energy - Detroit Edison Company	Karie Barczak	3,4,5		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC		Laura Lee	Duke Energy	1	SERC

				Duke Energy	Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Helen Lainis	IESO	2	NPCC
					Sean Cavote	PSEG	4	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC

David Kiguel	Independent	NA - Not Applicable	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC

Mike Forte	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Ashmeet Kaur	Con Ed - Consolidated Edison	5	NPCC
Caroline Dupuis	Hydro Quebec	1	NPCC
Chantal Mazza	Hydro Quebec	2	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Laura McLeod	NB Power Corporation	5	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC

					Gregory Campoli	New York Independent System Operator	2	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC



**1. The SDT approach is to align the FAC-002-2 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.**

**Summary Responses:**

The SDT received comments stating: “... doing only this separately from normal five year review, "Technical Rationale for Reliability Standards", and "Standards Efficiency" Projects is time consuming and unnecessary and inefficient.” Project 2017-07 was placed on hold for a substantial period of time to allow the SDT to work closely with other project teams to address standards that needed to be aligned with Registration in projects that were already open; including Technical Rationale for Reliability Standards, periodic reviews and the Standards Efficiency Review. This collaboration eliminated many standards that this team would have otherwise taken up. Subsequent to those collaborations, this project took back up the standards that were not addressed by other projects.

The SDT updated the version number in the Version History Table in agreement with comments received. In addition, the SDT has stricken “Entity” in the VSL language.

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>I am ok with removing references to retired functions.</p> <p>However, doing only this separately from normal five year review, "Technical Rationale for Reliability Standards", and "Standards Efficiency" Projects is time consuming and unnecessary and inefficient.</p>	
Likes	0
Dislikes	0

**Response**

Thank you for your comment. This project was placed on hold for a substantial period of time to allow the SDT to work closely with other project teams to address standards that needed to be aligned with Registration in projects that were already open, including Technical Rationale for Reliability Standards, periodic reviews and the Standards Efficiency Review. This collaboration eliminated many standards that this team would have otherwise taken up. Subsequent to those collaborations, this project took back up the standards that were not addressed by other projects.

**Dennis Sismaet - Northern California Power Agency - 6**

**Answer**

No

**Document Name**

**Comment**

I am ok with removing references to retired functions.

However, doing only this separately from the normal five year review, "Technical Rationale for Reliability Standards", and "Standards Efficiency" Projects is time consuming and unnecessary and inefficient.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. This project was placed on hold for a substantial period of time to allow the SDT to work closely with other project teams to address standards that needed to be aligned with Registration in projects that were already open, including Technical Rationale for Reliability Standards, periodic reviews and the Standards Efficiency Review. This collaboration eliminated many standards that this team would have otherwise taken up. Subsequent to those collaborations, this project took back up the standards that were not addressed by other projects.

**David Jendras - Ameren - Ameren Services - 3**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with EEI and supports the removal of Load Serving Entities from this standard.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your supportive comment.	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

WECC agrees with the proposed changes but questions whether the Version History Table, last entry, should indicate Version 3 rather than Version 2. All the other Standards associated with this project identify the newly proposed version as the last entry rather than the current version.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The SDT has updated the version number in the Version History Table.

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Exelon supports the removal of Load Serving Entities from FAC-002-2.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Texas RE noticed the following:

- In the VSL language, the word “Entity” needs to be removed in the Moderate, High, and Severe language for R3.
- On Page 8, in the Version History table, it should list version “3” in last box.

Likes 0

Dislikes 0

### Response

Thank you for your comments. The SDT has updated the VSL language to remove the word “Entity,” as well as changed the version number in the Version History Table.

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

Answer

Yes

Document Name

### Comment

EEl supports the removal of Load Serving Entities from this standard.

Likes 0

Dislikes 0

### Response

Thank you for your supportive comment.

**Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas**

**City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Westar Energy and Kansas City Power & Light support Edison Electric Institute’s response.

Likes 0	
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Dislikes 0	
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<b>Response</b>
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Thank you for your support.

**Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0	
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Dislikes 0	
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<b>Response</b>
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Thank you for your support.

**Leonard Kula - Independent Electricity System Operator - 2**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Glen Farmer - Avista - Avista Corporation - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your support.

**Laura Nelson - IDACORP - Idaho Power Company - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Thomas Foltz - AEP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer** Yes

**Document Name**

**Comment**



Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>John Tolo - Unisource - Tucson Electric Power Co. - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	

**Richard Jackson - U.S. Bureau of Reclamation - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Carl Pineault - Hydro-Quebec Production - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Stacy Lee - City of College Station - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Trey Melcher - Lower Colorado River Authority - 1,5</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Laurie Hammack - Seattle City Light - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Teresa Cantwell - Lower Colorado River Authority - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Jamie Johnson - California ISO - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your support.	
<b>faranak sarbaz - Los Angeles Department of Water and Power - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	

**2. The SDT approach is to align the IRO-010-2 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.**

**Summary Responses:**

Texas RE commented that the word “standard” appeared in the redline standard in the header on pages 7 and 8. The SDT has removed the word “standard” in the redline on Pages 7 and 8. In addition, Texas RE commented that the phrase “Corresponding changes have been made to proposed TOP-003-3,” and suggested this should be changed to refer to TOP-003-4. The SDT responded that the Guidelines and Technical Basis Initiative will be revising/updating the Guidelines and Technical Basis through that initiative. However, the corresponding changes referenced were made to TOP-003-3, not TOP-003-4. The SDT for Project 2017-07 made no change.

**Dennis Sismaet - Northern California Power Agency - 6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
See Response to Question 1.	
Likes 0	
Dislikes 0	

**Response**

Thank you. Please see response to comment in Question 1.

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	



NO. See Response to Question 1.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

EEl supports the changes proposed to IRO-10-2.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>David Jendras - Ameren - Ameren Services - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Ameren agrees with EEl and supports the changes proposed to IRO-10-2.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Texas RE noticed the word “standard” in the header on pages 7 and 8. The word “standard” does not appear in the header on the other pages.	

The phrase “Corresponding changes have been made to proposed TOP-003-3.” This should refer to TOP-003-4.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. In the redline, the word “standard” has been removed in the header on Pages 7 and 8. The Guidelines and Technical Basis Initiative will be revising/updating the Guidelines and Technical Basis through that process. In addition, the corresponding changes referenced were made to TOP-003-3, not TOP-003-4 – so no change made.

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Exelon supports the changes proposed to IRO-10-2.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>faranak sarbaz - Los Angeles Department of Water and Power - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Jamie Johnson - California ISO - 2</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Teresa Cantwell - Lower Colorado River Authority - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Laurie Hammack - Seattle City Light - 3</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Trey Melcher - Lower Colorado River Authority - 1,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your support.	
<b>Stacy Lee - City of College Station - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	



**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Richard Jackson - U.S. Bureau of Reclamation - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**John Tolo - Unisource - Tucson Electric Power Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Thomas Foltz - AEP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Laura Nelson - IDACORP - Idaho Power Company - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Glen Farmer - Avista - Avista Corporation - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	

**3. The SDT approach is to align the MOD-031-2 and MOD-033-1 standards with the RBR initiative by changing “Planning Authority” to “Planning Coordinator.” Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.**

**Summary Response:**

Comments were received recommending defining “Applicable Entity” since the term is capitalized and used in Requirement R2, Measure M2, Requirement R4, and Measure M4. The SDT responded that it would be out of scope for Project 2017-07 to define “Applicable Entity,” but pointed to “Applicable Entity,” Requirement R1, Part 1.1 of MOD-031 that reads:

- 1.1. A list of Transmission Planners, Balancing Authorities, and Distribution Providers that are required to provide the data (“Applicable Entities”).

The SDT struck the Background section in response to comments MOD-031 and updated the headers in the Rationale pages of MOD-031 and MOD-033 for consistency based on comments received.

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
NO. See Response to Question 1.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Dennis Sismaet - Northern California Power Agency - 6</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
See Response to Question 1.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Exelon supports the changes proposed to MOD-031-2 and MOD-033-1.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Texas RE recommends defining “Applicable Entity” since the term is capitalized and used in Requirement R2, Measure M2, Requirement R4, and Measure M4. The SDT could add the following language in section 4: “For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as Applicable Entities. For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.” Alternatively, Texas RE recommends using the term Responsible Entity as that is the term used and defined in the CIP Reliability Standards.</p> <p>Texas RE noticed the Background section was removed from MOD-033, but not in MOD-031.</p> <p>Texas RE recommends adding header information regarding the Standard in the Application Guidelines for both MOD-031 and MOD-033 such as was done in IRO-010 in order to be consistent.</p>	
Likes	0



Dislikes	0
<b>Response</b>	
<p>Thank you for your comments. It is out of scope for Project 2017-07 to define Applicable Entity, but the SDT would like to point you to “Applicable Entity,” Requirement R1, Part 1.1 of MOD-031 that reads:</p> <p style="padding-left: 40px;"><b>1.2.</b> A list of Transmission Planners, Balancing Authorities, and Distribution Providers that are required to provide the data (“Applicable Entities”).</p> <p>The Background section has been stricken from MOD-031. This team did update the header in MOD-031 and MOD-033 for consistency.</p>	
<b>David Jendras - Ameren - Ameren Services - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
<p>Ameren agrees with EEI and supports the changes proposed to MOD-031-2 and MOD-033-1.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your support.</p>	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
<p>EEI supports the changes proposed to MOD-031-2 and MOD-033-1.</p>	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you.	
<b>Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0

Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Glen Farmer - Avista - Avista Corporation - 5</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Laura Nelson - IDACORP - Idaho Power Company - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your support.	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>John Tolo - Unisource - Tucson Electric Power Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your support.

**Stacy Lee - City of College Station - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Trey Melcher - Lower Colorado River Authority - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Laurie Hammack - Seattle City Light - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	



**Teresa Cantwell - Lower Colorado River Authority - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Jamie Johnson - California ISO - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>faranak sarbaz - Los Angeles Department of Water and Power - 1</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	

**4. The SDT approach is to align the NUC-001-3 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.**

**Summary Responses:**

Texas RE commented that the Effective Date sections needed to be updated for consistency. The SDT made the corresponding changes for consistency.

**Dennis Sismaet - Northern California Power Agency - 6**

<b>Answer</b>	No
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<b>Document Name</b>	
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**Comment**

See Response to Question 1.

Likes	0
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Dislikes	0
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**Response**

Thank you. Please see response to comment in Question 1.

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	No
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<b>Document Name</b>	
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**Comment**

NO. See Response to Question 1.

Likes	0
Dislikes	0
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
EEI supports the changes proposed to NUC-001-4.	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>David Jendras - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with EEI and supports the changes proposed to NUC-001-4.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Texas RE noticed the Effective Date section is removed, but it exists in the previous standards reviewed (FAC-002-3, IRO-010-3, MOD-031-3, and MOD-33-2). Texas RE recommends keeping this section to be consistent.	
Likes	0
Dislikes	0

**Response**

Thank you for your comments. Standards have been updated for a consistent Effective Date Section.

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Exelon supports the changes proposed to NUC-001-3.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Jamie Johnson - California ISO - 2**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	



Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Trey Melcher - Lower Colorado River Authority - 1,5</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Stacy Lee - City of College Station - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your support.	
<b>Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>John Tolo - Unisource - Tucson Electric Power Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your support.

**Thomas Foltz - AEP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Laura Nelson - IDACORP - Idaho Power Company - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Glen Farmer - Avista - Avista Corporation - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	

**Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Teresa Cantwell - Lower Colorado River Authority - 5**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Carl Pineault - Hydro-Qu?bec Production - 5**

**Answer**

**Document Name**

**Comment**

N/A	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	



**5. The SDT approach is to align the PRC-006-3 standard with the RBR initiative and the standard is being revised to add “UFLS Only-Distribution Provider” consistent with NERC registration criteria. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.**

**Summary Responses:**

The SDT received a comment stating that the language should mimic the ROP, as well as a comment to remove the footnote. The SDT responded that UFLS-only Distribution Provider is a Registered Entity. The SDT did include a footnote in Draft 1 of PRC-006-4 to refer the reader to the definition of UFLS-only DP in the Rules of Procedure (ROP). The link has been removed from the standard, but the SDT retained the footnote.

Comments were received that UFLS-only DP should be added underneath "4.2.2 Distribution Providers." The SDT responded that UFLS entities may or may not include UFLS owners. 4.2 are Entities that are established by the Planning Coordinators; whereas 4.3 are entities owning UFLS equipment, but are not UFLS entities. In addition, it would be out of scope for Project 2017-7 to draft changes to the Applicability Section that are not listed in the SAR for alignment with RBR.

The version number has been updated throughout the standard. The Implementation Plan has been updated to: *“PRC-006 was updated to include the more-limited UFLS-only Distribution Provider (DP) to the Applicability Section,”* in response to comments received.

Comments were received to define Applicable Entity. It would be out of scope for Project 2017-07 to define Applicable Entity, but the SDT did point the commenter to “Applicable Entity,” Requirement R1, Part 1.1 of MOD-031 that reads: *“A list of Transmission Planners, Balancing Authorities, and Distribution Providers that are required to provide the data (“Applicable Entities”).”*

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
NO. See Response to Question 1.	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Dennis Sismaet - Northern California Power Agency - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
See Response to Question 1.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
The language should mimic the ROP such as: " Distribution Provider that operates a required UFLS" and a footnote should be used to refer the reader to the ROP. Anything less than this tends to cause confusion or result in more questions than it resolves.	
Likes	0
Dislikes	0

**Response**

Thank you for your comment. UFLS-only Distribution Provider is a Registered Entity. The SDT did include a footnote in Draft 1 of PRC-006-4 to refer the reader to the definition in the ROP.

**Richard Jackson - U.S. Bureau of Reclamation - 1**

<b>Answer</b>	No
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<b>Document Name</b>	
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**Comment**

Reclamation recommends revising the applicability section to eliminate redundancy between 4.2 and 4.3. Since Transmission Owners are identified as a subset of 4.2, it is not necessary to list them as a separate applicable entity in 4.3. Reclamation recommends the SDT revise 4.2 as follows:

From: 4.2 UFLS entities shall mean all entities that are responsible for the ownership, operation, or control of UFLS equipment as required by the UFLS program established by the Planning Coordinators. Such entities may include one or more of the following:

4.2.1 Transmission Owners

4.2.2 Distribution Providers

To: 4.2 UFLS entities – all entities that are responsible for the ownership, operation, or control of UFLS equipment or Elements as required by the UFLS program established by the Planning Coordinator. Such entities may include:

4.2.1 Transmission Owners

4.2.2 Distribution Providers

4.2.3 UFLS-Only Distribution Providers

Likes	0
-------	---

Dislikes	0
<b>Response</b>	
Thank you for your comment. UFLS entities may or may not include UFLS owners. 4.2 are Entities that are established by the Planning Coordinators; whereas 4.3 are entities owning UFLS equipment, but are not UFLS entities. In addition, it would be out of scope for Project 2017-7 to draft changes to the Applicability Section that are not listed in the SAR for alignment with RBR.	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
None	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Daniel Gacek - Exelon - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Exelon supports the changes proposed to PRC-006-3.	
Likes	0
Dislikes	0

**Response**

Thank you for your support.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Texas RE noticed the following:

- The attachment still uses PRC-006-3. Should that be updated to PRC-006-4? Thus, Requirements R3 and R4 would need to be updated to the new attachment name. The Regional Variance for Quebec’s attachment also references PRC-006-3.
- The Implementation Plan states that “PRC-006 was updated to replace Distribution Providers (DP) with the more-limited UFLS-only DP to the Applicability Section.” PRC-006-4 appears to add UFLS-Only DPs and not replace DPs. Texas RE suggests revising the implementation plan to match the standard.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. The version number has been updated throughout the standard. The Implementation Plan has been updated to: “PRC-006 was updated to include the more limited UFLS-only Distribution Provider (DP) to the Applicability Section.”

**David Jendras - Ameren - Ameren Services - 3**

**Answer** Yes

**Document Name**

**Comment**

"Attachment 1" (pg 37) and "Attachment 1A" (pg 39) do not have the titles changed to PRC-006-4. Reference to those two attachments show up on pages 2, 3, 4, 21, 22, 25, 26 & 27. We believe they would also need to be updated.

Also, on page 1 under Introduction > Applicability, we believe a bullet entitled "4.2.3 UFLS-Only Distribution Providers<sup>1</sup>" should be added underneath "4.2.2 Distribution Providers."

Likes 0

Dislikes 0

### Response

Thank you for your comments. The version number has been updated throughout the standard. The Implementation Plan has been updated to: "PRC-006 was updated to include the more-limited UFLS-only Distribution Provider (DP) to the Applicability Section." It is out of scope for Project 2017-07 to define Applicable Entity, but the SDT would like to point you to "Applicable Entity," Requirement R1, Part 1.1 of MOD-031 that reads:

- 1.1. A list of Transmission Planners, Balancing Authorities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

Answer Yes

Document Name

### Comment

EI supports the changes proposed to PRC-006-4.

Likes 0

Dislikes 0

### Response

Thank you for your support.

**Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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**Comment**

Westar Energy and Kansas City Power & Light support Edison Electric Institute’s response.

Likes 0	
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Dislikes 0	
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**Response**

Thank you.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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**Comment**

Please consider removing the footnote regarding NERC Rules of Procedure, Appendix 5 and link to the NERC website. The footnote appears to be unnecessary.

Likes 0	
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Dislikes 0	
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**Response**

Thank you for your comment. The ROP defines UFLS-only DP. The link has been removed from the standard, but the SDT retained a footnote.

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**Answer** Yes

**Document Name**

**Comment**

OPG concurs with the RSC comment.

Likes 0

Dislikes 0

**Response**

Please see responses to RSC comment.

**Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**



<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Glen Farmer - Avista - Avista Corporation - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Laura Nelson - IDACORP - Idaho Power Company - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	

Thank you for your support.

**Thomas Foltz - AEP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>John Tolo - Unisource - Tucson Electric Power Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	

**Stacy Lee - City of College Station - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Trey Melcher - Lower Colorado River Authority - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Laurie Hammack - Seattle City Light - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Teresa Cantwell - Lower Colorado River Authority - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Jamie Johnson - California ISO - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>faranak sarbaz - Los Angeles Department of Water and Power - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	

**6. The SDT approach is to align the TOP-003-3 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.**

**Summary Responses:**

There was a comment received that the Guidelines and Technical Basis references the incorrect version of PRC-001. The SDT responded that the Guidelines and Technical Basis Initiative could address that comment for the version number of PRC-001, but that this change would be out of scope for Project 2017-07.

**Dennis Sismaet - Northern California Power Agency - 6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
See Response to Question 1.	
Likes 0	
Dislikes 0	

**Response**

Thank you. Please see response to comment in Question 1.

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
NO. See Response to Question 1.	



Likes	0
Dislikes	0
<b>Response</b>	
Thank you. Please see response to comment in Question 1.	
<b>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
EEI supports the changes proposed to TOP-003-3.	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>David Jendras - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with EEI and supports the changes proposed to TOP-003-3.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Texas RE does not have any comments on the revisions to TOP-00-3. Texas RE did notice, however, that the Guidelines and Technical Basis references the incorrect version of PRC-001.	
Likes	0
Dislikes	0

**Response**

Thank you for your comment. The Guidelines and Technical Basis Initiative could address your comment for version number PRC-001, but this change would be out of scope for Project 2017-07.

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Exelon supports the changes proposed to TOP-003-3.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**faranak sarbaz - Los Angeles Department of Water and Power - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Jamie Johnson - California ISO - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Teresa Cantwell - Lower Colorado River Authority - 5</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Laurie Hammack - Seattle City Light - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Trey Melcher - Lower Colorado River Authority - 1,5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Stacy Lee - City of College Station - 1</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	



<b>Response</b>	
Thank you for your support.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>John Tolo - Unisource - Tucson Electric Power Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Thomas Foltz - AEP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Laura Nelson - IDACORP - Idaho Power Company - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Glen Farmer - Avista - Avista Corporation - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	

**7. Please provide any additional comments for the SDT to consider that you have not already provided for Project 2017-07.**

**Summary Response:**

There was a comment received stating that IRO-010-2 is also being reviewed as part of the “Technical Rationale for Reliability Standards” project. Project 2017-07 is proposing version 3 (IRO-010-3) and the SDT has collaborated with the Technical Rationale for Reliability Standards regarding IRO-010.

The SDT updated the Effective Date Sections for consistency in response to comments received.

Texas RE commented that there was an opportunity to streamline the standard, stating: *“The Applicability section lists both Generators Owners and more specific Generator Owners in section 4.1.6.1. It is likely that all Generators Owners will have these agreements so 4.1.6.1 could be removed. Thus, Requirement R5 could be removed since Requirement R2 applies to all Generator Owners.”* The SDT responded that Generator Owners in Applicability Section would be out of scope for Project 2017-07.

**Marty Hostler - Northern California Power Agency - 5,6**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
NONE	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dennis Sismaet - Northern California Power Agency - 6</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

IRO-010-2 is also being reviewed as part of the “Technical Rationale for Reliability Standards” project (proposing to remove the Guidelines and Technical Basis section, but leaving the version number as IRO-010-2).

Likes 0

Dislikes 0

**Response**

Project 2017-07 is proposing version 3 (IRO-010-3). The SDT has collaborated with the Technical Rationale for Reliability Standards regarding IRO-010.

**Richard Jackson - U.S. Bureau of Reclamation - 1**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

**Answer**

**Document Name**

**Comment**

None.	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Texas RE noticed Section A 5 Effective Date is removed, but it remains in other standards. In general Texas RE recommends reviewing the standards to ensure this section is consistent. Texas RE noticed things such as some have 5.1 See Implementation Plan while others just say “See Implementation Plan” with no 5.1.</p> <p>Texas RE suggests there is an opportunity to streamline this standard. The Applicability section lists both Generators Owners and more specific Generator Owners in section 4.1.6.1. It is likely that all Generators Owners will have these agreements so 4.1.6.1 could be removed. Thus, Requirement R5 could be removed since Requirement R2 applies to all Generator Owners.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comments. The SDT updated the Effective Date Sections for consistency. Generator Owners in Applicability Section would be out of scope for Project 2017-07.</p>	



**David Jendras - Ameren - Ameren Services - 3**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC**

**Answer**

**Document Name**

**Comment**

Please consider using the current NERC format for the revised standards. Please consider revising sections of the standards using current NERC wording. Example: Compliance section of the standards.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
	OPG concurs with the RSC comment.
Likes 0	
Dislikes 0	
<b>Response</b>	
	Thank you for your comment. Please see response to RSC comment.