

Comment Report

Project Name: 2017-07 Standards Alignment with Registration | Revised Standards Authorization Request
Comment Period Start Date: 2/1/2018
Comment Period End Date: 3/2/2018
Associated Ballots:

There were 18 sets of responses, including comments from approximately 67 different people from approximately 53 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. The SAR drafting team added “Additionally, the project will consider whether to include a definition for UFLS into the NERC Glossary of Terms, as well as review the standards to ensure consistent use of the term Planning Coordinator.” Do you agree the project should consider including a definition for UFLS into the NERC Glossary of Terms and reviewing the standards to ensure consistent use of the term Planning Coordinator? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

2. Project 2017-07 is a review and alignment effort resulting from the RBR Initiative project and would modify Reliability Standards to be consistent with the FERC-approved changes; as such, the SAR Drafting Team has removed references to PRC-004 and PRC-008 as being out of scope for this project. Do you agree that references to PRC-004 and PRC-008 should be removed from the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

3. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Brian Van Gheem	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Ginger Mercier	Prairie Power, Inc.	1,3	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Lucia Beal	Southern Maryland Electric Cooperative	3	RF
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Ryan Strom	Buckeye Power, Inc.	4	RF
					Shari Heino	Brazos Electric Power Cooperative, Inc.	1,5	Texas RE
					Amber Skillern	East Kentucky Power Cooperative	1,3	SERC
					Susan Sosbe	Wabash Valley Power Association	3	RF
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC	Ben Li	IESO	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Lori Spence	MISO	2	MRO
					Mark Holman	PJM	2	RF
					Matt Goldberg	ISONE	1	NPCC
					Ali Miremadi	CAISO	1	WECC

					Nathan Bigbee	ERCOT	1	Texas RE
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Exelon	Daniel Gacek	1,3,5,6		Exelon Utilities	Chris Scanlon	BGE, ComEd, PECO TO's	1	RF
					John Bee	BGE, ComEd, PECO LSE's	3	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no ISO-NE	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC					

					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Daniel Grinkevich	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Brian O'Boyle	Con Ed - Consolidated Edison	5	NPCC
					Sean Cavote	PSEG	4	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE	SPP Standards Review Group	Leo Bernier	AES - AES Corporation	5	NA - Not Applicable

1. The SAR drafting team added “Additionally, the project will consider whether to include a definition for UFLS into the NERC Glossary of Terms, as well as review the standards to ensure consistent use of the term Planning Coordinator.” Do you agree the project should consider including a definition for UFLS into the NERC Glossary of Terms and reviewing the standards to ensure consistent use of the term Planning Coordinator? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer No

Document Name

Comment

1. Utility Services agrees that a definition for UFLS and/or UFLS Program should be considered to be included in the NERC Glossary of Terms.
2. The FERC Order approving the Risk Based Registration Initiative did not include provisions for examining the consistent use of the term Planning Coordinator. We suggest this effort should be addressed as part of the Standards Efficiency Review project.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC

Answer No

Document Name

Comment

The IRC SRC supports adding a definition for UFLS into the Glossary of Terms. We do not agree that the review of all NERC standards for consistent use of the term Planning Coordinator is fruitful until the Standards Efficiency Review (SER) process is complete. This process may result in significant reductions and/or modifications to the NERC reliability standards. In fact, it would be more efficient to assess the consistency of “Planning Coordinator” if and when SARs are issued from the SER process. Unless there is a known problem with compliance and/or with ensuring reliability of the grid due to the lack of consistent application of the term, we see no need to undertake such a review at this time.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
UFLS should be well defined to reduce the confusion and subjectivity of assuring performance. There is a lot of inconsistency in how UFLS is currently being identified. This has resulted in a lot of subjectivity in auditing against these standards.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1,3,5,6, Group Name Exelon Utilities	
Answer	Yes
Document Name	
Comment	
The Exelon companies request that the SAR team provide additional detail regarding the changes to the SAR. We did not see anything in previous revisions or comments about the Planning Coordinator role.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 3,5	
Answer	Yes
Document Name	
Comment	
AEP has no objections to the standard drafting team considering adding a definition for UFLS to the NERC Glossary of Terms.	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes

Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
<p>The SPP Standards Review Group is in support of the SAR drafting team considering the inclusion of a definition for UFLS into the NERC Glossary of Terms. However, we would also ask the drafting team to take into consideration adding both the manual and automatic load shedding processes into their preliminary discussions for the development of the UFLS definition. From our perspective, the two processes need to be considered in order to maintain integrity and flexibility to the UFLS process as well as help the industry meet their functional roles pertaining to the reliability of the BES. As we reviewed standards like PRC-006-3, we observed that the term “UFLS Program” is mentioned throughout the document, however, it’s not defined in the NERC Glossary of Terms. Additionally, we reviewed the UVLS Program definition and our interpretation would have us believe that this definition is only addressing the automatic load shedding process. Finally, our research helped us identify that there is no definition in the NERC Glossary of Terms pertaining to manual load shedding. At this point of the process, we would like to suggest two options that could be used in your discussion in reference to the UFLS definition (see below).</p> <p>Option 1</p> <p>We suggest developing definitions for both terms “manual load shedding” and “UFLS Program” as well as including them in the NERC Glossary of Terms. This option may require developing a definition for manual load shedding as well UFLS Program.</p> <p>Option 2</p> <p>We suggest developing a definition for “UFLS Program” as you could use the “UVLS Program” definition as a foundational anchor and modify the definition to incorporate “manual load shedding” (see example below). However, this proposed action may require coordination with the UVLS drafting team (which may be out of scope) and may require the revision of the UVLS Program definition in the future.</p> <p>Undervoltage Load Shedding Program (original definition) - An automatic load shedding program, consisting of distributed relays and controls, used to mitigate undervoltage conditions impacting the Bulk Electric System (BES), leading to voltage instability, voltage collapse, or Cascading. Centrally controlled undervoltage-based load shedding is not included.</p> <p>Underfrequency Load Shedding Program (modified proposed definition) - Manual and automatic load shedding programs, consisting of distributed relays and controls, used to mitigate underfrequency conditions impacting the Bulk Electric System (BES), leading to voltage instability, voltage collapse, or Cascading. Centrally controlled undervoltage-based load shedding aer not included.</p>	
Likes 0	

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Ramkalawan - David Ramkalawan - 5	
Answer	Yes
Document Name	
Comment	
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 no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name	
Comment	
Texas RE is not opposed to defining UFLS, as long as it focuses on the technical side of UFLS and does not attempt to narrow the scope of applicability.	
Likes 0	
Dislikes 0	
Response	

2. Project 2017-07 is a review and alignment effort resulting from the RBR Initiative project and would modify Reliability Standards to be consistent with the FERC-approved changes; as such, the SAR Drafting Team has removed references to PRC-004 and PRC-008 as being out of scope for this project. Do you agree that references to PRC-004 and PRC-008 should be removed from the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Reliability Standard PRC-008 is not scheduled to be retired until 2027, as part of the PRC-005-6 implementation plan. Texas RE recommends including PRC-008 until it is fully retired.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

AEP has no objections to removing PRC-004 and PRC-008 from the proposed SAR for Project 2017-07.

Likes 0

Dislikes 0

Response

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

- Utility Services agrees that references to PRC-004 ad PRC-008 are out of scope for this project, and, it should be noted that these two Standards were never part of the original FERC Order approving the Risk Based Registration Initiative.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer

Yes

Document Name

Comment

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 no ISO-NE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Ramkalawan - David Ramkalawan - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vine - Richard Vine - 2	
Answer	
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee	

Likes 0

Dislikes 0

Response

3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer

Document Name

Comment

1. The redline edit of the phrase 'the appropriate applicable entity' in the Detailed Description section has been changed to 'the appropriate functional entity' in this SAR posting, however this does not sufficiently clarify that the reassignment of applicability will only be to 'the appropriate NERC registered entity' as suggested by commenters in the previous posting. This phrase should be clarified to indicate only NERC registered entities will be potentially reassigned applicability.

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

As stated in the previous comment period to this SAR, Texas RE recommends the SAR drafting team consider adding UFLS-only DPs to the applicability and requirement section of additional standards than were listed in the SAR. Texas RE does not agree that these standards are out of scope for this project and there is a reliability risk associated with not including UFLS-only DPs to the applicability and requirements sections of the standards described below. Texas RE notes the SAR does include reviewing the standards to ensure consistent use of the term Planning Coordinator. Texas RE respectfully requests the SAR drafting team describe how these standards are not in scope of this project. Furthermore, why is it in scope to review the standards to ensure consistent use of the term Planning Coordinator, but out of scope to review the standards listed below for consideration of adding UFLS-only DPs? Texas RE suggests it would be more efficient to consider making these changes now, while there is an open project related to applicability, rather than later, when there may or may not be an open project related to these standards.

Texas RE requests consideration of the following standards:

- EOP-004 – Add UFLS-only DPs as an entity with Reporting Responsibility in Attachment 1 to the following Event Types:
 - Automatic firm load shedding ≥ 100 MW (via automatic undervoltage or underfrequency load shedding schemes, or RAS) – If the event occurs to a UFLS-only DP, should be expected to have reporting responsibility. If it is not required, the UFLS-only DP may not report the event and thus there would be no opportunity to analyze it and make improvements in the future.
 - Damage or destruction of a Facility - UFLS DPs should have reporting responsibilities since one of the last lines of reliability defense is underfrequency relaying entities. If it is not required, the UFLS-only DP may not report the event and thus there would be no opportunity to analyze it and make improvements in the future.
- FAC-002 - FAC-002 needs to include UFLS-only DPs in the applicability section so new or materially-modified existing Facilities are coordinated and studied appropriately. If FAC-002 does not include UFLS-only DPs, the UFLS-only DP may not coordinate and cooperate on studies with its Transmission Planner or Planning Coordinator in accordance with FAC-002-2 Requirement R3.
- IRO-010 – If the UFLS-only DPs are not included, they may not provide data to its Reliability Coordinator in accordance with Requirement R3. This standard should include UFLS-only DP entities so that an RC can fully understand post-contingent projected system conditions (i.e. OPA and RTA) that may recognize a possible underfrequency event and corresponding reaction to said event. If the RC does not have the UFLS information available that analyses will be incomplete. The same issue applies to TOP-003.
- COM-002 – If UFLS-only DP is not added to the applicability, that entity may not do the training required by COM-002-4 Requirement R3 or three-part communication as required by COM-002-4 Requirement R6. A UFLS-only DP may receive Operating Instructions to coordinate the re-energization of underfrequency relay equipped load. That would indicate the need for proper communications between the appropriate parties. Furthermore, during a Blackstart scenario the UFLS-only DP may be required to not re-energize load (through an Operating Instruction) to help coordinate the stabilization of the grid during restoration.

Texas RE suggests modifying the SAR language to include these additional standards: *“Additionally, the project will include adding Underfrequency Load Shedding (UFLS)-only DPs to the Applicability Section and to the applicable Requirement language of COM-002, EOP-004, FAC-002, IRO-010, TOP-003, PRC-005, PRC-006 and other standards noted during this project. The project will also include reviewing and revising*

adding UFLS-only DP as appropriate to the Applicability Sections and Requirement language for PRC-004 and PRC-008 and any other Standard to which this issue may apply.”

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer

Document Name

Comment

1. We believe the SAR Type should include the option of withdrawing or retiring a Reliability Standard. If the SDT is assigned to implement the recommendations from a periodic review process, these could include the retirement of specific standards.
2. Under the detailed description of the proposed SAR, references to the FAC, INT, MOD, and NUC standard families are missing from the list of clean-up efforts to modify the Reliability Standard applicable entities (category #2). We ask the SDT to include these references under the specific clean-up effort category.
3. We believe a clarification is necessary regarding the intentions to review Reliability Standards and ensure consistent use of Planning Coordinator. A resolution to the long-standing debate between Planning Authority versus Planning Coordinator is long overdue, and we believe a separate clean-up effort should be identified. We propose the inclusion of “Modifications to existing standards and NERC Glossary Terms that replace references to Planning Authority with Planning Coordinator” to the list.
4. We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response