

Comment Report

Project Name: Project 2017-07 Standards Alignment with Registration
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.

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.

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	Duke Energy	Laura Lee	Duke Energy	1	SERC
					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.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

I am ok with removing references to retired functions.

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.

Likes 0

Dislikes 0

Response

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

David Jendras - Ameren - Ameren Services - 3

Answer No

Document Name

Comment

Ameren agrees with EEI and supports the removal of Load Serving Entities from this standard.

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**Steven Rueckert - Western Electricity Coordinating Council - 10**

Answer

Yes

Document Name

Comment

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**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

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

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

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

Answer

Yes

Document Name	
Comment	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes 0	
Dislikes 0	
Response	
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	
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

Glen Farmer - Avista - Avista Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stacy Lee - City of College Station - 1

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with EEl and supports the changes proposed to IRO-10-2.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

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

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

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

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

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Hammack - Seattle City Light - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Trey Melcher - Lower Colorado River Authority - 1,5

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	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Stacy Lee - City of College Station - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Thomas Foltz - AEP - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

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

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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	

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.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See Response to Question 1.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

See Response to Question 1.

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

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the changes proposed to MOD-031-2 and MOD-033-1.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

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.

Texas RE noticed the Background section was removed from MOD-033, but not in MOD-031.

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.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment	
Ameren agrees with EEI and supports the changes proposed to MOD-031-2 and MOD-033-1.	
Likes	0
Dislikes	0
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the changes proposed to MOD-031-2 and MOD-033-1.	
Likes	0
Dislikes	0
Response	
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	
Answer	Yes
Document Name	
Comment	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes	0
Dislikes	0
Response	
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**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**Glen Farmer - Avista - Avista Corporation - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stacy Lee - City of College Station - 1

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Trey Melcher - Lower Colorado River Authority - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Hammack - Seattle City Light - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
faranak sarbaz - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

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.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

EEl supports the changes proposed to NUC-001-4.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with EEl and supports the changes proposed to NUC-001-4.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

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

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

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

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

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Trey Melcher - Lower Colorado River Authority - 1,5

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stacy Lee - City of College Station - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

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

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

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.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See Response to Question 1.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

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

Answer No

Document Name

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

Response

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

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the changes proposed to PRC-006-3.

Likes 0

Dislikes 0

Response

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

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 Providers1" should be added underneath "4.2.2 Distribution Providers."

Likes 0

Dislikes 0

Response

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

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

Answer

Yes

Document Name

Comment

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

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

Yes

Document Name

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

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

OPG concurs with the RSC comment.

Likes 0

Dislikes 0

Response

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

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Stacy Lee - City of College Station - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Trey Melcher - Lower Colorado River Authority - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Hammack - Seattle City Light - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

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.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with EEl and supports the changes proposed to TOP-003-3.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

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

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

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

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

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joel Dembowski - Southern Company - Alabama Power Company - 3, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Hammack - Seattle City Light - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Trey Melcher - Lower Colorado River Authority - 1,5

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stacy Lee - City of College Station - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

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

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

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

Marty Hostler - Northern California Power Agency - 5,6

Answer

Document Name

Comment

NONE

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer

Document Name

Comment

None

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

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

Answer

Document Name

Comment

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

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

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name**Comment**

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.

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.

Likes 0

Dislikes 0

Response**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

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG concurs with the RSC comment.

Likes 0

Dislikes 0

Response