## Standard Authorization Request (SAR) Form

Complete and please email this form, with attachment(s) to: sarcomm@nerc.com

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information					
SAR Title:		MOD-032-1 Entity Change Due to Rules of Procedure Modification			
Date Submitted:		06/15/2017			
SAR Requester					
Name: Rich Hydzik on behalf of NERC I		on behalf of NERC Es	sential Re	liability Resources Work Group	
Organization: NERC ERSWG / Avista					
Telephone: 509 495 4005			Email:	rich.hydzik@avistacorp.com	
SAR Type (Check	as many as a	ipply)			
New Stand	lard		Imminent Action/ Confidential Issue (SPM		
Revision to	Existing Star	ndard	Section 10)		
Add, Modi	fy or Retire a	Glossary Term	Variance development or revision		
Withdraw/	retire an Exis	ting Standard	Otl	her (Please specify)	
Justification for	this proposed	d standard developm	ent proje	ct (Check all that apply to help NERC	
prioritize develo	pment)				
Regulatory	<sup>,</sup> Initiation		□ NF	RC Standing Committee Identified	
Emerging F	Risk (Reliabilit	y Issues Steering		hanced Periodic Review Initiated	
Committee) Ider	ntified		Industry Stakeholder Identified		
		elopment Plan		·	
Industry Need (V	Vhat Bulk Ele	ctric System (BES) re	liability be	enefit does the proposed project provide?):	
This project is in	tended to fac	ilitate accurate data	collection	to facilitate modeling of the Distribution	
Provider's (DP) f					
Purpose or Goal (How does this proposed project provide the reliability-related benefit described					
above?):					
Accurate modeling of distribution facilities is required to ensure that power system models accurately					
reflect the bulk power system (BPS) performance. These models are used in system analysis for planning					
purposes and construction of a reliable BPS. These models are in used in system analysis for operating					
purposes to ensure a reliable BPS in both short term, day-ahead, and real-time operational planning					
analyses.					
Project Scope (Define the parameters of the proposed project):					
This project proposes removing the Load Serving Entity (LSE) from the Applicability Section (4.1.3) and					
replacing LSE with Distribution Provider (DP) as the applicable entity for Section 4.1.3. LSE is no longer					
considered a reliability entity due to a change in the NERC Rules of Procedure. The DP is defined as					
"provides and operates the 'wires' between the transmission system and the end use customer." The					
DP is the applicable entity to provide data for power system modeling and analysis for distribution					
systems. Attachment 1 should be modified by replacing the applicable entity LSE with DP.					

#### Requested information

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g. research paper) to guide development of the Standard or definition):

This project proposes removing the Load Serving Entity (LSE) from the Applicability Section (4.1.3) and replacing LSE with Distribution Provider (DP) as the applicable entity for Section 4.1.3. LSE is no longer considered a reliability entity due to a change in the NERC Rules of Procedure. The DP is defined as "provides and operates the 'wires' between the transmission system and the end use customer." The DP is the applicable entity to provide data for power system modeling and analysis for distribution systems.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Cost impacts should be minimal. Planning Coordinator and Transmission Planners are required to collect modeling data under MOD-032-1. In the past, Planning Coordinator and Transmission Planners collected from LSE's. This entity would be the DP under the proposed change.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g. Dispersed Generation Resources):

#### None

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g. Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Planning Coordinator Transmission Planner
Transmission Operator Distribution Provider

Do you know of any consensus building activities<sup>2</sup> in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

No

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so which standard(s) or project number(s)?

Nο

Are there alternatives (e.g. guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

None identified

### Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles (Reliability Interface Principles)? Please check all those that apply.



1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

<sup>&</sup>lt;sup>1</sup> The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

<sup>&</sup>lt;sup>2</sup> Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Reliability Principles			
	2.	The frequency and voltage of interconnected bulk power systems shall be controlled within	
1		defined limits through the balancing of real and reactive power supply and demand.	
	3.	Information necessary for the planning and operation of interconnected bulk power systems	
		shall be made available to those entities responsible for planning and operating the systems	
		reliably.	
	4.	Plans for emergency operation and system restoration of interconnected bulk power systems	
		shall be developed, coordinated, maintained and implemented.	
	5.	Facilities for communication, monitoring and control shall be provided, used and maintained	
		for the reliability of interconnected bulk power systems.	
	6.	Personnel responsible for planning and operating interconnected bulk power systems shall be	
		trained, qualified, and have the responsibility and authority to implement actions.	
	7.	The security of the interconnected bulk power systems shall be assessed, monitored and	
		maintained on a wide area basis.	
	8.	Bulk power systems shall be protected from malicious physical or cyber attacks.	

Market Interface Principles		
Does the proposed standard development project comply with all of the following		
Market Interface Principles?		
<ol> <li>A reliability standard shall not give any market participant an unfair competitive advantage.</li> </ol>	yes	
<ol><li>A reliability standard shall neither mandate nor prohibit any specific market structure.</li></ol>	yes	
<ol> <li>A reliability standard shall not preclude market solutions to achieving compliance with that standard.</li> </ol>	yes	
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	yes	

Identified Existing or Potential Regional or Interconnection Variances			
Region(s)/	Explanation		
Interconnection			
e.g. NPCC			

# For Use by NERC Only

SAR Status Tracking (Check off as appropriate)					
Draft SAR reviewed by NERC Staff Draft SAR presented to SC for acceptance DRAFT SAR approved for posting by the SC	Final SAR endorsed by the SC  SAR assigned a Standards Project by NERC  SAR denied or proposed as Guidance document				

### **Version History**

Version Date		Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January X, 2017	Standards Information Staff	Revised