

Comments on Reliability Standards Errata

The Standards Committee thanks all commenters who submitted comments on the various Reliability Standards errata. NERC posted the errata for a 30-day comment period from February 2, 2009 through March 2, 2009 to provide stakeholders an opportunity to identify any material impacts associated with the errata that staff may have missed. The stakeholders were asked to provide feedback on the errata through a special Electronic Standard Comment Form. There were 20 sets of comments, including comments from over 60 different people from approximately 40 companies representing 7 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Standards_Errata.html

Based on the comments received, the Standards Committee's Process Subcommittee is recommending that the Standards Committee approve moving already identified corrections to the following standards forward for adoption by the Board of Trustees with the additional change to MOD-021-0 Requirement R1 to show the possessive version of all of the responsible entities.

- IRO-006-4 — Reliability Coordination — Transmission Loading Relief
- MOD-021-0 — Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts
- PER-001-0 — Operating Personnel Responsibility and Authority
- TPL-006-0 — Data From the Regional Reliability Organization Needed to Assess Reliability

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 and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

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

Index to Questions, Comments, and Responses

- 1. There are four approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata. 6**

Consideration of Comments on Various Reliability Standards Errata

The Industry Segments are:

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

	Commenter	Organization	Industry Segment																																																																																					
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6.	Russell A. Noble	Cowlitz County PUD					x																																																										
7.	Alan Gale	City of Tallahassee (TAL)			x			x																																																									
8.	Kirit Shah	Ameren			x			x		x																																																							
9.	Jianmei Chai	Consumers Energy Company					x		x	x																																																							
10.	Kris Manchur	Manitoba Hydro			x			x		x		x																																																					
11.	Michael Gammon	Kansas City Power & Light			x			x		x		x																																																					
12.	Greg Rowland	Duke Energy Corporation			x			x		x		x																																																					
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16.	Dan Rochester	Independent Electricity System Operator		x										
17.	Edward J Davis	Entergy Services, Inc	x		x			x	x					
18.	Jason L. Marshall	Midwest ISO		x										
19.	Jalal Babik	Dominion Resources Inc	x		x			x	x					
20.	James H. Sorrels, Jr	American Electric Power	x		x			x	x					

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1. There are four approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata.

Yes — I do agree that the noted errors in the reliability standards are correctly identified as errata.

No — I do not agree that the noted errors in the reliability standards are correctly identified as errata.

Summary Consideration: All commenters but one agreed that the noted errors in the reliability standards are errata. One commenter indicated disagreement with the correction to IRO-006-04 – however the reason provided does not indicate disagreement that the change would be “errata” – the comment provided indicates disagreement with the concept of including an Internet link in a standard.

Organization	Yes or No	Question 1 Comments:
Consumers Energy Company	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	The changes recommended in the Errata are very minor and administrative in nature, we would support these changes, except for changes in IRO-006-04, which includes an Internet link to a WECC document. Our suggestion is that we do not include an Internet link to an actual document in the standard since the link is broken and the document could also be changed later on with a new Internet address.
<p>Response: The standard already included Internet links, so the proposed change is not adding a link where there had been none – the proposed change is to replace the incorrect link with the correct link. Since most commenters agreed that the proposed change is “errata” the Process Subcommittee will recommend that the change be adopted as errata.</p>		
Entergy Services, Inc	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	In addition to the changes identified above we suggest the entities in the first line of R1 of MOD-021 be written in the possessive: Load-Serving Entity's and Transmission Planner's.
<p>Response: You are correct, and the proposed revisions are grammar corrections and do not change the requirement and thus will be made.</p>		
SERC OC Standards Review Group	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	The SERC OC Standards Review Group supports the determination of the Standards Committee that the errors noted in the above approved standards are errata.
IRC Standards Review	Yes - I do agree that the noted errors in the reliability standards are correctly	We support these errata changes.

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Committee	identified as errata.	
NPCC	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Bonneville Power Administration	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Southern Company	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Cowlitz County PUD	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
City of Tallahassee (TAL)	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Ameren	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Manitoba Hydro	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Kansas City Power & Light	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Duke Energy Corporation	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
American Transmission	Yes - I do agree that the noted errors in the reliability standards are correctly	

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Company	identified as errata.	
Brazos Electric Power Cooperative Inc.	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
ERCOT	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Independent Electricity System Operator	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Midwest ISO	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Dominion Resources Inc	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
American Electric Power	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	