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## Consideration of Comments on Specific Version 0 Draft 1 Standards Standard 051

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### Standard 051

#### Summary Consideration:

There were many comments indicating that the requirements in this standard be modified to more closely align with the original language in the 'S' statements from the source document. The SDT did try to convert the 'S' statements, but refrained from using the exact language that included "...designed and constructed...". Because the original requirements and measures did not include any requirements or measures for 'designing' or 'constructing', the SDT did not include these words in the translation because they would have changed the requirement in a way that would expand on what is required and measured today. (Version 1's SAR 500 is addressing this issue.) The SDT will ask a question with the second posting of Version 0 to determine if there is industry consensus that this omission was appropriate.

The SDT made the following changes to Standard 051:

- Revised the first requirements for each of the four Standards to more accurately preserve the 'intention' of the original "S" statements
- Revised the Standard titles to remove the word, 'Assessments' and to add 'Category A', 'Category B', 'Category C', 'Category D' as appropriate
- Deleted the requirements for the Regions to submit reports of their assessments and corrective plans to NERC because these are duplicated in Standard 052 and the measures and levels of non-compliance for this requirement are in Standard 052, not in Standard 051.
- Moved the criteria for 'studies or simulation testing' into the criteria for 'valid assessments'
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

#### General comments and comments on the whole standard

Section	Requirement or Measure	Comment	Commenter
		Suggest title to be expanded to "Transmission System Adequacy and Security Assessment on Individual Transmission Owners Systems" to differentiate this section from Sec 052. It would be helpful to indicate the Category of outages that are being tested in Std 51, Sections 1, 2, 3, and 4; eg Category A, B, C, and D instead of or in addition to the descriptions of single bulk system element, etc. The terms "single bulk system element" and "loss of two or more bulk system elements are not entirely correct and the Category designations are more accurate. For example, loss of single bulk system element such as bus sections or breaker is actually Category C events as each outage removes two or more bulk system elements. This is actually an issue with the existing standards however adding the Category designation to the description would clarify the standard without changing it.	Paul Arnold BPA

Consideration: Agreed that adding the name of the associated Category will help users and this has been done. The SDT declined to change

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the title of the 'set of standards' since most entities didn't indicate it was misleading.

1,2,3,4	"Projected firm transfers" need to be defined so that a clear understanding exists of what is to be modeled.	Ameren
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Consideration: The SDT did not draft definitions for terms that are already in use.

Levels of non-compliance used to be based only on not having an assessment but now includes not having a corrective plan. Corrective plan language in the non-compliance measures is not in the existing templates.	Gerry Burrows KCP&L
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Consideration: The Compliance Templates approved by the NERC BOT in April, 2004 were used as the 'source' documents for this translation, and these Compliance Templates required both an assessment and a corrective plan for 51.1, 51.2 and 51.3.

Reliability Authority should also be included in the Standard Applicability for most of the sections. Section 1 – 4 R1-1, R2-1, R3-1, R4-1 - "System Simulation Study/Testing Methods" in all of these Requirements should be included in Item 3 of the list, or made as an Item by itself.	Ed Davis Entergy
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Consideration: The Functional Model states that the RA ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area. Since this standard is for periods generally one year and beyond, the applicability of RA is inconsistent with the FM. The SDT modified the requirement to clarify that the criteria listed for system studies or testing are really a subset of the requirement to conduct assessments.

S-1	The requirements under S-1 of the existing document language were eliminated. Significant reduction in requirements.	PSE&G
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Consideration: Please see the SDT's table showing how S1 language was translated. The SDT did change the first requirement in each of the four Standards to more accurately reflect the original S1 language. No requirements or measures were deleted, and the original intent of the standard was preserved.

S-2	Similar comments as in S-1 in S-2, S- 3, and S-4 except actually call on transmission owners to provide statement of action.	PSE&G
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Consideration: This comment suggests creating an additional requirement which is beyond the scope of the translation provided in Version 0. This should be addressed in Version 1.

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all sections	Regional Differences	See NPCC BPS Definition in Question 1	Boisvert; TransEnergie  Brandian; ISO-NE
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Consideration: The specific definition of Bulk Power System that you've recommended was written for the "Northeast", and is inappropriate for more widespread use without some adjustments. The SDT did develop a glossary – for planning terms, the glossary includes the definitions already approved by the NERC BOT. These will be posted with the second draft of Version 0.

Change the term "NERC Region" to "Regional Reliability Council".	Frank McElvain Tri-State G&T
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Consideration: Agree with the concept – for Version 0 the term, 'Regional Reliability Organization' will be used.

NPCC feels this should be part of the Version 0 standard package. However the S language from the template should be added.	Brandian; ISO-NE Guy Zito; NPCC
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Consideration: Please see the SDT's table showing how S1 language was translated. The SDT did change the first requirement in each of the four Standards to more accurately reflect the original S1 language. No requirements or measures were deleted, and the original intent of the standard was preserved.

Sections 1-4	Standards I.A specified the system performance criteria (Table I) required to be met for planning the system. The translation to Version 0 has changed the intent of the standard from a Planning Standard to an Assessment Standard. MH believes that the standard should retain the primary requirement that the transmission system be planned to meet the requirements of Table I. The assessment requirement is actually a measurement of whether or not the planned system meets the specified performance requirement.	Gerald Reaht Manitoba
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Consideration: Please see the SDT's table showing how S1 language was translated. The SDT did change the first requirement in each of the four Standards to more accurately reflect the original S1 language. No requirements or measures were deleted, and the original intent of the standard was preserved.

The standards should apply to the Transmission Planner and the Transmission Owner, and not the Planning Authority. The PA has over site, but does not do the planning and assessment.	Gerald Reaht Manitoba
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Consideration: The Functional Model states that the PA will "Assess, develop, and document resource and transmission expansion plans". The FM further defines PA as "It integrates and assesses the plans from the Transmission Planners and Resource Planners within the Planning

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Authority Area to ensure those plans meet the reliability standards ...”. Transmission Owners on the other hand “Install and maintain transmission facilities “, “Considers transmission expansion plans identified by the Planning Authority” and “Provides transmission expansion plans and changes to the Planning Authority and Transmission Planners’

The Standards should clarify the timing for the corrective plan. When an assessment study finds that the system is not able to meet the performance requirements, a corrective plan is required. Normally, development of mitigation plans requires subsequent studies, and may actually be done by a different entity than the entity performing the assessment (the TO instead of the RTO who may have done the assessment). A written summary of plans is required. The SDT must clarify if the written summary of mitigation plans is part of the assesement report or not. MH believes that it should be a separate document, and addressed as such in the cpmpliance section.

Gerald Reahl  
Manitoba

Consideration: The standard states that “R1-3. Reporting Requirements - The documentation of results of these reliability assessments and corrective plans shall annually be provided ....” The source document did not contain additional details about the timing of a corrective plan. This is a good suggestion and is applicable to Version 1 – adding more details here would be beyond the scope of the SDT.

all The existing document applies to the owner of the systems who would be obligated to perform the plans they identify. However, the PA and TP do not have the ability to financially obligate the owners. This lack of financial obligation reduces the existing document to a study rather than action.

Robert Snow

Consideration: The revised draft of Version 0 does not include the language from the original ‘S’ statement that indicated the system had to be ‘designed and constructed’. The SDT could not find any requirements or measures in the source document that included any specifics related to ‘design and construct’.

ALL ALL MAPP has numerous other comments about this standard that were provided for NERC Version 1 SAR 500. MAPP is concerned that penalties not be based upon a number of low-probability low-consequence events in Category C such as breaker or bus failure resulting in marginal local area overloads.

MAPP Planning Standards Subcommittee

Consideration: These MAPP concerns should be addressed in Version 1. There will be no financial penalties assigned for non-compliance with Version 0 Standards.

**Comments on Purpose**

Purpose Add more of the language from S1 to the purpose. A lot is lost in the translation as to the true purpose of the standard. Add "The interconnected transmission system shall be planned, designed, and constructed at a minimum to meet ....'

MAPP Planning Standards Subcommittee

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Consideration: The purpose statement explicitly states what outcomes will be achieved by the adoption of this standard. The SDT modified the individual requirements to more accurately reflect the totality of the original 'S' statements. Note that the SDT did receive several comments indicating that the intent of the standard was revised in the translation, and the SDT modified the first requirement in each of the four Standards to better reflect the original 'S' statements. Please see the SDT's table showing how S1 language was translated.

### Comments on Section 1

Reliability Authority should also be included in the Standard Applicability for most of the sections.

Ed Davis Entergy

Section 1 – 4 R1-1, R2-1, R3-1, R4-1 - "System Simulation Study/Testing Methods" in all of these Requirements should be included in Item 3 of the list, or made as an Item by itself.

Consideration: The Functional Model states that the RA ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area. Since this standard is for periods generally one year and beyond, the applicability of RA is inconsistent with the FM. The SDT modified the requirement to clarify that the criteria listed for system studies or testing are really a subset of the requirement to conduct assessments.

R1-1 "4. Address any planned upgrades needed to meet the performance requirements of Category A." is vague. Replaced "Address" with "Provide the status of".

MAPP Planning  
Standards  
Subcommittee

Consideration: Adding these words adds a new requirement and is beyond the scope of the SDT – this is a good comment for Version 1.

It appears that the existing label heading "System Study/Testing Methods" should be prefixed with "R1-2" to read as follows:

Terry Bilke  
MISO

"R1-2 System Study/Testing Methods"

Then re-number the subsequent R1-"n" headings one number higher than they are presently numbered.

Under this newly corrected heading "Standard 051 R1-2 System Study/Testing Methods" reword item 5. The purpose of the rewording is to meet the current intent, but improve the current wording. The current wording implies that there is never a conflict with modeling projected firm transfers. Firm transfers in the planning horizon based on confirmed Transmission Service Reservations and Network Service to not translate to a unique set of transfers that can be modeled. The changed wording allows disallowing impossible simultaneous use of Firm reservations in creating the mode by leaving out the word "all" and adding some qualifying words. The revised wording also provides the key instructional words needed to create the intended model from a market-based environment versus the current confirmed Firm Transmission Service set of information. This should help clarify how to achieve the intended notion of

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modeling just the firm transfers.

Replace:

5. Have all projected firm transfers modeled.

With:

5. Have projected firm transfers modeled (includes all firm transfers that are simultaneously possible).

Or also affect a market-based notion of firm transfers by replacing with:

5. Have projected firm transfers modeled (includes all firm transfers that are simultaneously possible). Or similarly in a central dispatched or market based environment, model simultaneously possible firm bi-lateral contracts and model a dispatch of the system with a high hurdle rate so as to mitigate the creation of a constrained base case model.

Consideration: Adding new requirements is beyond the scope of Version 0 and should be addressed in the development of Standard 500 in Version 1. The SDT did re-arrange the elements in the Requirement to clarify that the criteria for 'System Study/Testing Methods' is a subset of the criteria for having a 'valid' assessment.

R1-1            In the System Simulation/Testing Methods, #1 references " the responsible entity". The specific entity should be identified: RRC, Planning Authority, Transmission Planner etc...            FRCC

Consideration: The SDT modified this to make it clarify that this is the entity that is conducting the assessment.

R1-1            M1-1 : Requires documentation and plans by an agent but nothing from the owner.            PSE&G

Consideration: Agreed. Under the Functional Model, the PA and TP are responsible for developing transmission plans and for conducting transmission assessments. Adding requirements is beyond the scope of the SDT.

R1-1 and R1-2: Changed responsibility from owners to authority/planner. Original had the owner on the hook for upgrades. Revised just requires a study.            PSE&G

Consideration: The current I.A.S1 through S4 reference "construction" but there were never any requirements or measures that addressed this – and this reference was omitted from Version 0. The SDT is asking the industry for feedback on the appropriateness of this omission.

R1-2            This requirement states that the Planning Authority and Transmission Planner shall "provide a written summary of its plans", but there is no indication of which entities will receive the plans.            FRCC

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**Consideration:** R1-3 indicates that the plans are provided to the respective Regions.

R1-2 Item 1      Add the words 'and affected systems' the following sentence: 'Procedures for coordinated joint studies of Consumers new facilities and their impacts on the interconnected transmission systems'

**Consideration:** Adding new requirements is beyond the scope of Version 0 and should be addressed in the development of standard 500 for Version 1.

R1-2              It seems redundant for both the Planning Authority and the Transmission Planner to provide a written summary of its plans. The Planning Authority is ultimately responsible, and should keep all the documentation. At a minimum, the wording should be changed to “or” instead of “and”.              Bryan Guy  
Progress

**Consideration:** The TP develops plans for its TP Area and submits those plans to the PA – The PA collects plans from the TPs and RPs and develops a larger plan for its PA Area.

I.A Annual      The Applicability of this standard has been and should continue to be with the Transmission Planning organizations. While ERCOT serves as the Planning Authority in the functional model, it does not have under Assessment anywhere near the resources required to perform these assessments - the Transmission Planners will normal, category B, C Authority and the Transmission Planner will lead to confusion as to who is really responsible. and D contingencies I.A.M1, I.A.M2, I.A.M3, I.A.M4              Bill Bojorquez  
ERCOT

**Consideration:** The Functional Model addresses functions and does restrict delegating tasks to another entity; however, the responsibility remains as defined in the FM. The TP develops plans for its TP Area and submits those plans to the PA – The PA collects plans from the TPs and RPs and develops a larger plan for its PA Area.

These measures state that the Planning Authority and Transmission Planner “shall provide evidence”, but there is no indication of which entities will receive the evidence.              FRCC

**Consideration:** The Compliance Monitor was added to clarify this issue.

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M1-1 and M1-2 Evidence for assessments and corrective plans should be provided by the Planning Authority, not the Transmission Planner Bryan Guy  
Progress

Consideration: The TP develops plans for its TP Area and submits those plans to the PA – The PA collects plans from the TPs and RPs and develops a larger plan for its PA Area.

### Comments on Section 2

M2-1, M2-2 Page 10 of 24, Section 2; Page 16 of 24, Section 3 Peter Mackin  
TANC  
The comment column states, 'Added words "available assessment and corrective plans" to the language to make it a measurable standard'. However, M2-1 and M2-2, M3-1 and M3-2 do not include the word "available". Is this intentional?

Consideration: The comment in the 'comment column' was entered in error.

Reliability Authority should also be included in the Standard Applicability for most of the sections. Ed Davis Entergy  
Section 1 – 4 R1-1, R2-1, R3-1, R4-1 - "System Simulation Study/Testing Methods" in all of these Requirements should be included in Item 3 of the list, or made as an Item by itself.

Consideration: The FM states that the RA ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area. Since this standard is for periods generally one year and beyond, the applicability of RA is inconsistent with the FM.

R2-1 Item no. 10, under subheading System Simulation Study/Testing Methods, should be changed to read: Travis Bessier  
TXU  
10. Include the effects of existing and planned protection systems, including any backup, redundant, or Special Protection Systems. Add an item no. 13 as follows: 13. Include the effects of existing and planned operating procedures.

Consideration: This comment suggests creating an additional requirement which is beyond the scope of the translation provided in Version 0. This should be addressed in Version 1.

R2-2 This requirement states that the Planning Authority and Transmission Owner shall "provide a written summary of its plans", but there is no indication of which entities will receive the plans. In addition, the applicable entity should be Transmission Planner not owner. FRCC



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M3-1, M3-2      Page 16 of 24, Section 3      Peter Mackin TANC

The comment column states, 'Added words "available assessment and corrective plans" to the language to make it a measurable standard'. However, M3-1 and M3-2 do not include the word "available". Is this intentional?

**Consideration:** The comment in the 'comment column' was entered in error.

Reliability Authority should also be included in the Standard Applicability for most of the sections.      Ed Davis Entergy

Section 1 – 4 R1-1, R2-1, R3-1, R4-1 - "System Simulation Study/Testing Methods" in all of these Requirements should be included in Item 3 of the list, or made as an Item by itself.

**Consideration:** The FM states that the RA ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area. Since this standard is for periods generally one year and beyond, the applicability of RA is inconsistent with the FM.

R3-1      Same as R2-1 above.      Travis Bessier  
TXU

**Consideration:** See response to R2-1

R3-1      Delete "12. Include the planning (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planning (including maintenance) outages are performed." Or at a minimum, qualify it to refer to "only known maintenance outages".      MAPP Planning  
Standards  
Subcommittee

**Consideration:** The language in Version 0 is a direct translation of the source document – your suggestion is a modification of what is in the existing documents, and is appropriate for consideration in Version 1.

R3-2      The first sentence should reference Requirement 3-1 as R3-1 to be consistent.      Consumers

**Consideration:** Agreed – your suggestion has been implemented.

R3-2      Wording is not consistent with R1-2. See comment for R1-2.      Bryan Guy  
Progress

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**Consideration:** See response to R1-2

R3-2	This requirement states that the Planning Authority and Transmission Owner shall “provide a written summary of its plans”, but there is no indication of which entities will receive the plans. In addition, the applicable entity should be Transmission Planner not owner.	FRCC
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**Consideration:** R3-3 indicates that the plans are provided to the Regions. The typographical error was corrected.

M3-1 and M3-2	Evidence for assessments and corrective plans should be provided by the Planning Authority, not the Transmission Planner	Bryan Guy Progress
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**Consideration:** The TP develops plans for its TP Area and submits those plans to the PA – The PA collects plans from the TPs and RPs and develops a larger plan for its PA Area.

M3-1 and M3-2	These measures state that the Planning Authority and Transmission Planner “shall provide evidence”, but there is no indication of which entities will receive the evidence.	FRCC
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**Consideration:** The Compliance Monitor was added to clarify this issue.

M3-2	Change to read, “The Planning Authority...its reliability assessments and corrective plans per Standard 051 R3-3”.	Frank McElvain Tri-State G&T
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**Consideration:** Agreed – your correction has been implemented.

Compliance Monitoring Process	All sections but Section 3 have the following statement in them, "Each Region shall report compliance and violations to NERC via the NERC Compliance Reporting Process." Add this phrase to Section 3 Compliance Monitoring Process. Also change the statement to read "Each Regional Reliability Council shall report..." in all sections.	MAPP Planning Standards Subcommittee
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**Consideration:** The language is a direct translation of the source document.

**Comments on Section 4**

R4-1, R4-2	Page 20 of 24  The comment column states, ‘Added words “have available assessments of” to the language to make it a	Peter Mackin TANC
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measurable standard'. However, M4-1 and M4-2 state, "shall provide assessments" instead of "have available assessments of". Is this intentional?

**Consideration:** The comment in the 'comment column' was entered in error.

1 Exelon Corporation suggests that Standard 051 be moved to Version 1 to address table D contingencies. We don't feel that it is necessarily appropriate to study the worst contingency since that will most likely be catastrophic. R4 is a weak standard in that no specific mitigation is required. We think that it would be better to perform an analysis on a 'credible' or 'reasoned' contingency that may be more likely, a specific concern, etc. John Blazekovich  
Exelon

**Consideration:** Making this change is outside the scope of the SDT.

Reliability Authority should also be included in the Standard Applicability for most of the sections. Ed Davis Entergy  
Section 1 – 4 R1-1, R2-1, R3-1, R4-1 - "System Simulation Study/Testing Methods" in all of these Requirements should be included in Item 3 of the list, or made as an Item by itself.

**Consideration:** The FM states that the RA ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area. Since this standard is for periods generally one year and beyond, the applicability of RA is inconsistent with the FM.

R4-1 System Simulation Study/Testing Methods - This section refers to extreme event testing (Category D). As such, there is some limited subset of extreme event conditions that are developed for study. There are many more events which are not tested, some of which are less severe and some which are more severe. It is the judgment of the Transmission Owner/Operator to determine which extreme events are required to be analyzed. This renders the explanation requirements for 1b inappropriate. Charles Matessa  
BG&E

**Consideration:** Making this change is outside the scope of the SDT.

R4-1 Item no. 7, under subheading System Simulation Study/Testing Methods, should be changed to read: 7. Include the effects of existing and planned protection systems, including any backup, redundant, or Special Protection Systems. Add an item no. 10 as follows: 10. Include the effects of existing and planned operating procedures. Travis Bessier  
TXU

**Consideration:** Making this change is outside the scope of the SDT.

M4-1 Change to read, "The Planning Authority...the system responses per Standard 051 R4-1". Frank McElvain

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Tri-State G&T

**Consideration: Agreed – this change was implemented.**

M4-1 and M4-2 These measures state that the Planning Authority and Transmission Planner “shall provide evidence”, but there is no indication of which entities will receive the evidence. FRCC  
In addition, error in referencing Section 3 requirements and measures in Section 4.

**Consideration: Agreed. The Compliance Monitor was added to clarify this issue. The typo has been corrected.**

4 We believe that Measure M3-2 in Section 4 should actually be designated as Measure M4-2. Peter Mackin  
TANC

**Consideration: Agreed – these have been corrected.**

M4-1 and M4-2 Evidence for assessments and documentation should be provided by the Planning Authority, not the Transmission Planner Bryan Guy  
Progress

**Consideration: The TP develops plans for its TP Area and submits those plans to the PA – The PA collects plans from the TPs and RPs and develops a larger plan for its PA Area.**

M4-2 Change to read, “The Planning Authority...its reliability assessments per Standard 051 R4-2”. Frank McElvain  
Tri-State G&T

**Consideration: Agreed. The standard was revised to reflect this correction.**

4 We believe Measure M4-1 should actually reference Standard 051R4-1 (not Standard 051 R3-1). Peter Mackin  
TANC

**Consideration: Agreed – these have been corrected.**

**Comments on Table**

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Table 1 - Note a) Please clarify that applicalbe ratings pertaining to emergency short durations are only applicable to thermal ratings, and not voltage limits. In the first sentence voltage limits are included in the applicable rating definition but there is no distinction made in the second sentence for short term thermal limits versus short term voltage limits which in our opinion should not apply. Charles Matessa  
BG&E

Consideration: Adding new requirements is beyond the scope of Version 0 and should be addressed in the development of standard 500 in Version 1.

Table 1: Should address deliverability of generation to load PSE&G

Consideration: Adding new requirements is beyond the scope of Version 0 and should be addressed in the development of standard 500 in Version 1.

## Consideration of Comments on Specific Version 0 Draft 1 Standards Standard 052

### Standard 052

#### Summary Consideration:

The SDT made the following changes to Standard 052:

- Modified the Purpose statement to omit specific references to NERC Planning Standards since these will be retired when Version 0 is adopted.
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Changed 'Compliance Monitor' for all RRO requirements to "Unaffiliated Third Party" to conform to the Functional Model
- Made minor format changes for consistency

#### Comments on Standard 52

Section	Requirement or Measure	Comment	Commenter
		The proposed standard (52) appears to be consistent with the previous standards and we have no comments.	Steve Rueckert WECC
		<b>Consideration: The SDT appreciates your support</b>	
		Suggest title to be expanded to "Transmission System Adequacy and Security Assessment by Regional Reliability Council" to differentiate this section from Sec 051.	Paul Arnold BPA
		<b>Consideration: Most entities did not see a problem with the title, so no change was made.</b>	
		Regional Reliability Council referred to in this standard throughout should be replaced with appropriate entities included in the Functional Model. Adequacy and Security are components of Reliability, therefore, the Title of the Standard should be either Transmission and Generations System Reliability Assessment, or it should be Transmission and Generation System Adequacy and Security Assessment.	Ed Davis Entergy
		<b>Consideration: The SDT did not re-assign the requirements in this standard because of the concern that doing so could not be accomplished without adding so much additional information to the standard that the changes would either be a new requirement for some entities or would look like 'new requirements.'</b>	
		<b>System Adequacy includes generation, and there were no other comments indicating the original title needed modifications, so the SDT defaulted to keeping the original.</b>	
	Purpose	Since the NERC Planning Standards will be retired with the adoption of Version 0 Standards, it should not be referenced in Standard 052.	FRCC

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Standard 052**

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**Consideration:** Agreed. This reference has been omitted.

Purpose	Purpose should be rewritten to indicate that "NERC needs to review and assess the overall reliability (adequacy and security) of the interconnected bulk electric systems, both existing and planned and needs to ensure that each RRC complies with the NERC Planning Standards and its own Regional planning criteria."	MAPP Planning Standards Subcommittee
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**Consideration:** The purpose statement was revised but not as suggested. Other commenters indicated a need to omit the reference to NERC Planning Standards since these will not exist when Version 0 is adopted.

Section 1-2 Measure s	M1-1 and M2-1	These measures state that the Regional Reliability Council "shall provide evidence", but there is no indication of which entities will receive the evidence.	FRCC
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**Consideration:** Agreed. The standard has been revised to indicate that the evidence must be provided to the Compliance Monitor

S-1	Table 1	Add section on corrective action plans that requires that identified issues are resolved in a timely manner.	PSE&G
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**Consideration:** The SDT is confused by this comment since there is no Table in standard 052.

**Standard 053**

**Summary Consideration:** Several entities asked the SDT to modify the standard to include the TSP in the list of entities with responsibility for the requirements. Under the Functional Model, these requirements are assigned to the Transmission Owner, not the TSP, so this change was not made.

The SDT made the following changes to Standard 053:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments and comments on the whole standard**

Section	Requirement or Measure	Comment	Commenter
		Applicability: The Transmission Planning and Planning Authority functions should be added to Facility Connection Requirements since part of this section pertains to studies to be performed.	Paul Arnlod BPA
		<b>Consideration:</b> Implementing this would change the intent of this standard.	
		Facility Connection Requirements - used to place the burden on Transmission Providers, in conjunction with Transmission Owners (Standard I.C.S1.M1). Version 0 R1-1 says only the Transmission Owner shall document, maintain, and publish...." these standards. In some cases the interconnection agreement is between the transmission provider and the generator.	Gerry Burrows KCP&L
		<b>Consideration:</b> Agreed. However, the Functional Model assigns this responsibility to the Owners, not the Providers. The Functional Model does not preclude the Owner from delegating this task to other entities through agreements.	
		Is there are rational between using 5 business days for R1-3 and 30 days for R2-2? Preference would be to use 30 days throughout standard.	MAPP Planning Standards Subcommittee
		<b>Consideration:</b> This is a 'straight translation' from the language in the existing Planning Standard.	
		This standard should be kept.	MAPP Planning Standards Subcommittee
		<b>Consideration:</b> Agreed.	

**Comments on Standard 053**

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2	1	Exelon Corporation suggests that Standard 051 be moved quickly to Version 1 to provide more direction as to when an assessment is required for an interconnection, especially for load-serving entities.	John Blazekovich Exelon
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**Consideration: Agreed.**

Some of these requirements are by FERC filing or state mandate, not just NERC.	PSE&G
This needs to apply to the Transmission Owner or its designated agency such as an RTO/ISO.	
Need to clarify requirements of end-users of the transmission system	
Removed requirement to not degrade system when making interconnections (No impairments)	

**Consideration: Agreed.** The SDT did not intentionally change any of the requirements in this standard. If the source document listed “FERC” or other entities, then we would have included that language in Version 0.

This standard does apply to Transmission Owners – and the Transmission Owner may have agreements with other entities that may perform some of the tasks in the standard.

For Section 1 - The requirements of the end users are to be established by the Transmission Owners.

Section 2 requires that all entities coordinate and cooperate on their assessments.

This is an exact translation of existing requirements – additional requirements will not be developed as part of Version 0.

The existing purpose statement adequately addresses the requirement not to degrade the system.

**Comments on the Purpose**

Purpose	The statement of avoiding degrading the reliability of the electric system is not in the new language. The standard needs to identify that adding facilities should not result in reductions in system capability.	Robert Snow
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**Consideration: The existing purpose statement adequately addresses this.**

Purpose	The purpose references entities “responsible for the reliability of the interconnected transmission systems”; this should be revised to address specific Functional Model entities.	FRCC
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**Consideration: The purpose statement has been revised to remove this reference.**

**Comments on Section 1**

**Comments on Standard 053**

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1,2	R3, R4, R5, R6	Good translation of existing standards to Version 0. Changes to language have made standard more clear.	MAPP Planning Standards Subcommittee
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Consideration: Thank you for your support.

Section1	R1-1	This requirement should reference “NERC Reliability Standards” to eliminate any confusion with the existing standards and policies.	FRCC
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Consideration: Agreed. This change was made.

R1-1	The Transmission Operator should be included along with Transmission Owner as applicable entity.	Ameren
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Consideration: The Functional Model assigns this responsibility to the Transmission Owner, not the Transmission Operator. The Transmission Owner may have agreements with Transmission Operators to address situations where the TOP is performing this task for the Transmission Owner.

S-1	R1-1	Need to add Load Serving Entities to list	PSE&G
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Consideration: LSEs were not in the original Planning Standard and are not assigned this responsibility under the Functional Model. Under the Functional Model, LSEs negotiate agreements using facility connection requirements, but don't have an active role in developing facility connection requirements.

“Transmission Owner” should be capitalized at the end of R1-1 (top of page 3)

Consideration: Agreed – we will correct this.

Section 1	R1-2	There is a concern that the TO is stated as being responsible and may in fact not be the proper entity. It is suggested that if this is not sufficiently covered in the FERC IA, then language be added to allow entities to share TO responsibilities through applicable Agreements.	Brandian ISO-NE Guy Zito NPCC
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Consideration: The existing Planning Standard assigns this requirement to the Transmission Owner, and the Transmission Owner may have agreements with other entities that may perform some of the tasks in the standard.

Comments on Standard 053

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S1 Requirements Add FERC and State requirements to the list of applicable agencies. Robert Snow

Consideration: This suggestion would expand on the existing requirement and is outside the scope of the SDT. Even if we were allowed to change the requirement, adding this language would not be appropriate – FERC and States have their own requirements.

R1-3 Add "or designated agency" such as RTOs PSE&G

Consideration: This suggestion would expand on the existing requirement and is outside the scope of the SDT.

Need a way for the TO to delegate this to their RTO. The language does not seem to provide delegation. Robert Snow

Consideration: The Transmission Owner may have agreements with other entities that may perform some of the tasks in the standard. These agreements are expected to be in place as part of the Certification requirements for entities that want to be certified.

1.C M1 The translation for I.C.S1.M1 makes a fundamental shift for responsibility from the transmission providers to the transmission owners. The applicability should at least include the Planning Authority functional entity SPP

Consideration: The original standard does say Transmission Owner and Provider, but under the Functional Model this is a Transmission Owner, not a Transmission Service Provider function.

Section 1-2 Measures M1-1 – M1-3 These measures state that the Transmission Owner “shall make available for inspection evidence”, but there is no indication of which entities will inspect the evidence. FRCC

Consideration: Agreed. The Compliance Monitor was added to clarify this issue.

Omit “they” at end of M1-2 (top of page 5) Ed Davis  
Entergy

Consideration: Agreed – this correction has been made.

S1 Requirements In addition to not providing an impact study for a new facility, a level 4 violation is having a completed study with assumptions that are not consistent with present conditions. Robert Snow

Consideration: The SDT isn't charged with adding new requirements, so this suggestion is outside the scope of the SDT but should be

## Comments on Standard 053

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considered with Version 1.

Change “Regions” to “Compliance Monitor” in all Compliance Monitoring Process sections Ed Davis  
Entergy

Consideration: Agreed.

### Comments on Standard 53 - Section 2

2 This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051 Bob Millard  
MAIN

Consideration: There wasn't industry consensus on whether to try to eliminate all requirements that appeared redundant, so the SDT defaulted to retaining the requirements so it is easier for the industry to verify that all requirements were translated into Version 0.

Section 2 This should already be covered by the process outlined in the FERC IA, Final Ruling which requires coordination of interconnection studies and is not necessary for inclusion in the NERC Version 0 Standards. (Existing I.C.M2) Guy Zito  
NPCC

Consideration: This was included in existing Planning Standards, and the SDT is charged with translating the existing requirements without adding or deleting any, so this change wasn't adopted.

1,2 R3, R4, R5, R6 Good translation of existing standards to Version 0. Changes to language have made standard more clear. MAPP Planning Standards Subcommittee

Consideration: Thank you for your support.

Planning S2 The translation eliminated necessary language from the original standard. Need to return subregional organizations (i.e., reserve sharing groups) and power pool organization (NWPPC). Deanna Phillips  
BPA

Consideration: This requirement is captured in R2-1.2

Section 2 R2-1 This requirement states that the applicable entities will “coordinate and cooperate” , more clarity FRCC

should be included in this requirement as to which entities.

#2 - This requirement should reference “NERC Reliability Standards” not “NERC Planning Standards”

#4 – Recommend the following revision for clarity:

*Evidence that the assessment included steady-state, short-circuit, and dynamics studies as necessary to evaluate system performance **in accordance with** Reliability Standard 051.*

Consideration: The proposed standard does identify what entities need to coordinate and cooperate.

Agreed – Planning was changed to “Reliability”

The proposed revision doesn’t change the intent and was adopted.

S-2	R2-1	Evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems [ADD "in terms of Loss of Load Event probabilities and deliverability"]. What would be considered evidence that the parties cooperated? It is not clear how the Functional Model would work in a state with BGS supply (Utilities are not LSEs). Identify that any new project shall not reduce total transfer capability.	PSE&G
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Consideration: The proposed addition would change the original requirement and is outside the scope of the SDT.

Evidence is addressed as part of the compliance administration – where this was somewhat vague in the source document, the SDT declined to make up new details.

Making interpretations of how the Functional Model applies to individual situations is outside the scope of the SDT.

Listing exclusions would be adding new language to the standard and is outside the scope of the SDT.

Section 2	Levels of Non-Compliance	For consistency, the levels of non compliance should be formatted like Section 1 levels of non compliance referencing the standard.	FRCC
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Consideration: The standards format will be consistent when finalized – it is currently still a ‘work in progress.’

S2	This is a good example of the compliance not being consistent with the impact on reliability. If an impact study is completed but the underlying assumptions about the system have completely changed, the To would be in compliance but not have the slightest idea of how the	Robert Snow
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**Comments on Standard 053**

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project impacted the reliability of the presently planned power system.

Consideration: The SDT did not change the levels of non-compliance in the source document . Any changes to the levels of non-compliance need to be addressed in Version 1.

Change “Regions” to “Compliance Monitor” in all Compliance Monitoring Process sections

Ed Davis

Entergy

Consideration: Agreed – this will be changed.

**Standard 054**

**Summary Consideration:**

Several commenters indicated that measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability-related reasons. In respect of these comments, the SDT will forward these comments to the Joint Interface Committee (JIC) and, if appropriate, these standards will be translated by NAESB. In addition, the SDT will ask the industry for additional feedback on whether ATC, CBM and TRM should be addressed as Business Practices during the second posting of Version 0. To ensure that Version 0 continues to be developed on schedule, the SDT has modified the first draft of Version 0 standards that address ATC, CBM and TRM to conform to the individual comments submitted by industry participants. If the industry and the JIC determine that ATC, CBM and TRM should be addressed as Business Practices, the individual sections of standards that address these requirements will be removed from Version 0 before being presented to the Ballot Pool.

The SDT made the following changes to Standard 054:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Changed the Compliance Monitor to indicate this is an Unaffiliated Third Party, not NERC
- Made minor format changes for consistency

**General comments or comments on the entire standard**

Section	Requirement or Measure	Comment	Commenter
		should include requirements for TSPs to follow TTC/ATC calculation methodology developed by regions. If this is not a requirement now, it should be flagged for follow-up for the corresponding Version 1 process.	Paul Arnold BPA
		Consideration: Agreed that this would be a good addition for Version 1. R2-1 does require that the Region verify that the methodology is being used, but this standard doesn't have any measures or levels of non-compliance applied to the TSP.	
Standards		Why do we need to have 3 standards related to the same existing Standard I.E?	Brandian ISO-NE Guy Zito NPCC
		Consideration: The three standards address different areas. Existing standard IE was originally two standards.	

## Comments on Standard 054

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Standards	"Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard." Should this statement not be included also in 55 and 56?	Boisvert TransEnergie Brandian ISO-NE Guy Zito NPCC
<b>Consideration:</b> If the language were in the source document, the SDT would have included it in Version 0 – adding new language is outside the scope of the SDT.		
	In discussing of RS 600 (Determine Facility Ratings, Oper. Limit and Transfer Capabilities) in "V1" process, it was concluded that ATC were a commercial issue	Boisvert TransEnergie
<b>Consideration:</b> The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.		
	The ATC is a business issue that should not be part of the Version 0 standard. In addition there are parts of the Northeast that have FERC approved Market Designs that don't use ATC, CBM or TRM.	Guy Zito NPCC Boisvert TransEnergie
<b>Consideration:</b> The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.		
	Under "Applicability"; there is no list of systems exempt from posting ATC, though it is stated there are such systems. The text should either quote a statute or reference a standard that describes parties which are required or exempt from posting ATC, or the criteria should be succinctly stated in the text of this Standard.	Frank McElvain Tri-State G&T
<b>Consideration:</b> The Applicability Section isn't included in the 'template' for new Reliability Standards and isn't included in the next draft of Version 0. If the language were in the source document, the SDT would have included it in Version 0 – adding new language is outside the scope of the SDT. Since the source document didn't include a listing of what entities would be exempt from posting ATC, the translation to		

## Comments on Standard 054

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Version 0 doesn't include a listing of entities exempt from posting ATC. This is a good suggestion for Version 1.

These standards need to apply more broadly than regions. Probably needs to be with balancing or scheduling authority to be consistent with markets. PSE&G

Consideration: The suggestion is outside the scope of the SDT since it would expand the existing requirements.

### Comments on Purpose

purpose The "NERC definition" for TTC/ATC, CBM, and TRM should be contained within each of the purpose statements. Each of the "Standards" should be self contained. Raj Rana AEP

Consideration: There will be a separate definitions section or a glossary to accompany the set of Reliability Standards, but the definitions won't be included in the individual standards.

### Comments on Section 1

R1-1 Repeating that "(Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard.)" is redundant because it is handled in the Standard Applicability section, and should be removed. The term "include" in letter a is also redundant as R1-1 already indicates what must be included. Letter b should be changed to read, "An account of reservations...". Also remove "are included" from the end of letter b on page 3/10. Frank McElvain Tri-State G&T

Consideration: Because the "Applicability" section won't be included in the final version of Draft 0, the SDT will keep the parenthetical phrase as it appears in the standard.

The suggested grammar changes have been adopted and are reflected in the revised standard.

In R1-1b, "transmission provider's system" should be changed to Functional Model entity Transmission Service Provider's system Ed Davis Entergy

Consideration: Agreed – the change has been made.

R1-1-f Change the word "customer" to "native load". Frank McElvain Tri-State G&T

## Comments on Standard 054

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Consideration: The change was not made because 'customer' is not synonymous with 'native load' and 'customer' was used in the source document.

R1-1-h                      Suggest the wording be changed to read as follows: "If Total Transfer Capability or Available Transfer Capability value normally change over different time horizons (such as hourly, daily, or monthly) describe assumptions and calculation methods".                      Frank McElvain  
Tri-State G&T

Consideration: The change suggested would have been interpreted as a change in the requirement and wasn't adopted – this is a change for Version 1.

## Comments on Section 2

Sections 2 & 3 - Add a row "Section 2 Applicability – appropriate Functional Model entity" and "Section 3 Applicability - appropriate Functional Model entity."                      Ed Davis  
Entergy

Consideration: The Applicability section won't be included in the final format of Version 0 standards.

2                      M2-2                      As an example of how compliance evidence sections should read, change this section to read as follows: "The Regional Reliability Council shall have evidence in the form of a mail receipt returned from NERC indicating it complied with NERC's request in accordance with 054-R2-3."                      Frank McElvain  
Tri-State G&T

Consideration: The SDT was charged with translating the existing documents without adding or deleting any requirements, measures or compliance elements. The suggested change would add clarity, but it also adds a requirement that isn't in the source document, so this wasn't adopted.

## Comments on Section 3

Sections 2 & 3 - Add a row "Section 2 Applicability – appropriate Functional Model entity" and "Section 3 Applicability - appropriate Functional Model entity."                      Ed Davis  
Entergy

Consideration: The Applicability section won't be included in the final format of Version 0 standards.

R3-1                      Change "on how" to "by which".                      Frank McElvain  
Tri-State G&T

**Comments on Standard 054**

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Consideration: This suggestion would change the source requirement, and wasn't adopted.

R3-1-d

The recourse for a customer must be specified in this standard. One logical recourse would be controlled access to data and analysis used to determine ATC.

Frank McElvain  
Tri-State G&T

Consideration: Adding these details would expand on the scope of the source document and needs to wait for Version 1.

**Standard 055**

**Summary Consideration:**

Several commenters indicated that measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability-related reasons. In respect of these comments, the SDT will forward these comments to the Joint Interface Committee (JIC) and, if appropriate, these standards will be translated by NAESB. In addition, the SDT will ask the industry for additional feedback on whether ATC, CBM and TRM should be addressed as Business Practices during the second posting of Version 0. To ensure that Version 0 continues to be developed on schedule, the SDT has modified the first draft of Version 0 standards that address ATC, CBM and TRM to conform to the individual comments submitted by industry participants. If the industry and the JIC determine that ATC, CBM and TRM should be addressed as Business Practices, the individual sections of standards that address these requirements will be removed from Version 0 before being presented to the Ballot Pool.

The SDT made the following changes to Standard 055:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Changed the Compliance Monitor to indicate this is an Unaffiliated Third Party, not NERC
- Made minor format changes for consistency

**General comments or comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
Standards		Why do we need to have 3 standards related to the same existing Standard I.E?	Brandian ISO-NE Guy Zito NPCC
		<b>Consideration:</b> The three standards address different areas. Existing standard IE was originally two standards.	
		CBM and TRM is a business issue that should not be part of the Version 0 standard. In addition there are parts of the Northeast that have FERC approved Market Designs that don't use ATC, CBM or TRM.	Brandian ISO-NE
		<b>Consideration:</b> The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.	
		CBM and TRM is a business issue that should not be part of the Version 0 standard. In addition there are parts of the Northeast that have FERC approved Market Designs that don't use ATC, CBM or TRM.	Guy Zito NPCC Boisvert TransEnergie

**Comments on Standard 055**

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**Consideration:** The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.

The outline numbering scheme used in section 3 is inconsistent with other sections. Here numbers are used below numbers; elsewhere, lowercase letters are used below numbers. McElvain Tri-state

**Consideration:** The format is still a ‘work in progress’.

Standards "Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard." Should this statement not be included also in 55 and 56? Boisvert  
TransEnergie  
Brandian ISO-NE

**Consideration:** If the language were in the source document, the SDT would have included it in Version 0 – adding new language is outside the scope of the SDT.

1.E. 1.E.2.M1,  
1.E.2.M2,  
1.E.2.M3,  
1.E.2.M4,  
1.E.2.M5 Similar to ATC, Regions may be exempt from calculating Capacity Benefit Margin (CBM). The Applicability should read: "Regional Reliability Council (Certain systems that are not required to post CBM values are exempt from this Standard.)" Bill Bojorquez  
ERCOT

**Consideration:** If the language were in the source document, the SDT would have included it in Version 0 – adding new language is outside the scope of the SDT.

applicability Add exemption language as follows: (Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard.) Travis Bessier  
TXU

**Consideration:** If the language were in the source document, the SDT would have included it in Version 0 – adding new language is outside the scope of the SDT.

heading applicability The applicability section in the main title should also include the Transmission Service Provider as section 3 and 4 refers to such. MAPP Planning  
Standards  
Subcommittee

**Consideration:** Because the “Applicability” section won’t be included in the final version of Draft 0, the SDT did not incorporate this change.

## Comments on Standard 055

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Need to make it clear that the ATC in a region covers a geographic region, not just the members of the region. What is the relationship between shared reserves and CBM?

PSE&G

**Consideration:** Adding this information would be an expansion of the existing requirement and wasn't added – this would be good to consider for Version 1.

### Comments on Purpose

purpose

The "NERC definition" for TTC/ATC, CBM, and TRM should be contained within each of the purpose statements. Each of the "Standards" should be self contained.

Raj Rana  
AEP

**Consideration:** Definitions will be included in a separate, stand-alone glossary.

### Comments on Section 1

"Applicability" for Sections 1 and 2 should be changed to "appropriate Functional Model Entity"

Ed Davis Entergy

**Consideration:** The Applicability section won't be included in the final format of Version 0 standards.

1 1-c

Change "...units within..." to "...units which affect deliveries into or within..."

Frank McElvain  
Tri-State G&T

**Consideration:** This would be an enhancement, but would be considered a change to the existing requirement and should be considered for Version 1.

R1-1 has several references to "transmission provider" that should be changed to Functional Model entity "Transmission Service Provider".

Ed Davis Entergy

**Consideration:** Agreed – this change has been implemented.

### Comments on Section 2

"Applicability" for Sections 1 and 2 should be changed to "appropriate Functional Model

Ed Davis Entergy

Entity”

Consideration: The Applicability section won't be included in the final format of Version 0 standards.

2                      The word “resulting” has been added before values. This limits the type of values that are subject to RRO analysis. There are also input values. Translation should be changed to duplicate the original document.                      Bob Millard  
MAIN

Consideration: Agreed. The word, 'resulting' was in the original 'S1' statement.

2                      R2-1                      List item (C) refers to "ATC" and else where acronyms have been spelled out. Suggest expand "ATC" to Available Transfer Capability.                      MAPP Planning Standards Subcommittee

Consideration: Agreed – this change has been made.

2                      R2-1                      List item (D) refers to "Regions". Suggest changing to Regional Reliability Council to match rest of document.                      MAPP Planning Standards Subcommittee

Consideration: This will be changed to Regional Reliability Organization in all Version 0 documents for consistency.

R2-1c has ATC abbreviation that should be written fully                      Ed Davis Entergy  
R2-1d, M3-2, R4-2, and M4-1 have “Regions” that should be changed to appropriate Functional Model entity.

Consideration: Agreed – this change has been implemented.

2                      M2-2                      states "in accordance with Reliability Standard 055-R2-1 and R2-2" it really is referring to 055-R2-2 and R2-3.                      MAPP Planning Standards Subcommittee

Consideration: Agreed- the change has been implemented.

2                      Change "Load Service Entity" to "Load Serving Entity".                      Frank McElvain

## Comments on Standard 055

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Tri-State G&T

**Consideration: Agreed – the change has been implemented.**

2            1-a            Change this section to read as follows: “Indicate the frequency under which the review shall be implemented or the system conditions which would dictate that review is necessary.”  
Frank McElvain  
Tri-State G&T

**Consideration: This is a good suggestion – but is an expansion on existing requirements and is applicable to Version 1, not Version 0.**

2            1-c            Remove the words “same” and “also” in the second sentence to eliminate unnecessary words.  
Frank McElvain  
Tri-State G&T

**Consideration: The suggested change was adopted and is reflected in the revised standard.**

2            1-d            Change to read as follows: “Require updated Capacity Benefit Margin values to be made available to the Regions, NERC and transmission users.”  
Frank McElvain  
Tri-State G&T

**Consideration: Because this language was in the source document, the SDT declined to make this change –this should be addressed in Version 1.**

## Comments on Section 3

3                            The outline numbering scheme used in section 3 is inconsistent with other sections. Here numbers are used below numbers; elsewhere, lowercase letters are used below numbers.  
Frank McElvain  
Tri-State G&T

**Consideration: The format for Version 0 is still a work in progress.**

R3-1                        CBM is only an import quantity. The text of 55-R3-1 and 55-R3-2 should be changed to reflect this.  
Frank McElvain  
Tri-State G&T

**Consideration: The suggested change would be a modification of existing requirements and wasn't adopted.**

3            M3-2            Replace "Regions" with Regional Reliability Council.  
MAPP Planning

## Comments on Standard 055

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Standards  
Subcommittee

Consideration: The SDT will make a global change to the Version 0 to make all standards reference Regional Reliability Organization.

1.E.2 M4 Applicable to the Transmission Provider with the Region doing the compliance enforcement. SPP  
In our case, the Region is the Transmission Provider so it will result in a compliance review that is self-certification.

Consideration: Under the Functional Model, if the Region is also assigned a requirement, compliance will be assessed by an Unaffiliated Third Party .

3 compliance monitoring process Replace "Regions" with Regional Reliability Council. MAPP Planning Standards Subcommittee

Consideration: The SDT will make a global change to the Version 0 to make all standards reference Regional Reliability Organization.

## Comments on Section 4

R4-1 does not say to whom Transmission Service Providers should report CBM as was does in original policy (M5). Ed Davis Entergy

Consideration: Agreed – this change was implemented.

R4-1 "Each Transmission Service Provider that uses Capacity Benefit Margin (CPS) shall report the use of CPS by the Load Serving Entities' loads on it system, except for CPS sales as non-firm transmission service." NEED MORE DEFINITION ON TO WHOM THIS IS REPORTED AND HOW CLOSELY THE POSTING FOLLOWS ITS' USE IN ORDER TO PROVIDE INFORMATION THAT IS USEFUL AND ALLOWS COMPARAISON Mike Gildea Constellation

Consideration: Agreed – this was revised to include the list of entities that are to receive this report. Adding more details would expand the scope of the source document and is outside the scope of the SDT.



## Comments on Standard 055

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Levels of Non Compliance	Recommended revision for clarity:  An assessment of non-compliance will only be considered if a  Data Set is posted after the established due date. Violations will not be assessed for Data Sets posted by the scheduled dates.	FRCC
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Consideration: This comment is applicable to Standard 58, section 6. The suggestion was not adopted because it would have changed the intent – the MMWG establishes the posting date, which is not the same as any single Data Set due date. A footnote has been added to Standard 58.6 to clarify what was intended.

**Standard 056**

**Summary Consideration:**

Several commenters indicated that measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability-related reasons. In respect of these comments, the SDT will forward these comments to the Joint Interface Committee (JIC) and, if appropriate, these standards will be translated by NAESB. In addition, the SDT will ask the industry for additional feedback on whether ATC, CBM and TRM should be addressed as Business Practices during the second posting of Version 0. To ensure that Version 0 continues to be developed on schedule, the SDT has modified the first draft of Version 0 standards that address ATC, CBM and TRM to conform to the individual comments submitted by industry participants. If the industry and the JIC determine that ATC, CBM and TRM should be addressed as Business Practices, the individual sections of standards that address these requirements will be removed from Version 0 before being presented to the Ballot Pool.

The SDT made the following changes to Standard 054:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Changed the Compliance Monitor to indicate this is an Unaffiliated Third Party, not NERC
- Made minor format changes for consistency

**General comments and comments about the entire standard**

Section	Requirement or Measure	Comment	Commenter
Standards		Why do we need to have 3 standards related to the same existing Standard I.E?	Brandian ISO-NE Guy Zito NPCC
<b>Consideration:</b> The three standards address different areas. Existing standard IE was originally two standards.			
Standards		"Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard." Should this statement not be included also in 55 and 56?	Boisvert TransEnergie Brandian ISO-NE
<b>Consideration:</b> Since this statement was not in the source document, it was not translated into the Version 0 document.			
		CBM and TRM is a business issue that should not be part of the Version 0 standard. In addition there are parts of the Northeast that have FERC approved Market Designs that don't use ATC, CBM or TRM.	Brandian ISO-NE
<b>Consideration:</b> The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.			

**Comments on Standard 056**

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1.E.	1.E.2.M6, 1.E.2.M8	Similar to ATC and CBM, Regions may be exempt from calculating Transmission Reliability Margin (CBM). The Applicability should read: "Regional Reliability Council (Certain systems that are not required to post Transmission Reliability Margin values are exempt from this Standard."	Bill Bojorquez ERCOT
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**Consideration:** Since this statement was not in the source document, it was not translated into the Version 0 document.

Since TRM and CBM are margin related to ATC, these also should be of commercial concern.	Boisvert TransEnergie
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**Consideration:** The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.

CBM and TRM is a business issue that should not be part of the Version 0 standard. In addition there are parts of the Northeast that have FERC approved Market Designs that don't use ATC, CBM or TRM.	Guy Zito NPCC Boisvert TransEnergie
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**Consideration:** The SDT has referred this issue to the JIC for determination on whether the requirements addressing ATC should be handled by NERC or NAESB. The SDT will leave these requirements in Version 0 until a determination is made.

Applicability	Add exemption language as follows: (Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard.)	Travis Bessier TXU
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**Consideration:** Since this statement was not in the source document, it was not translated into the Version 0 document.

1.E.2	M5	Applicable to the Transmission Provider with the Region doing the compliance enforcement. In our case, the Region is the Transmission Provider so it will result in a compliance review that is self-certification.	SPP
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**Consideration:** IE2 M5 is not in Standard 056.

**Note that the Functional Model Technical reference includes the following explanation on page 22 to address these situations:**

In those situations where the Compliance Monitor is also the organization performing a reliability service or operating function (such as a Regional Council that is also the Reliability Authority), then the Compliance Monitor for that function should be a third party that is unaffiliated with that organization.

**Comments about Purpose**

Purpose	Delete "and uniform", replace "users" with "providers and owners", and replace "transactions" with "transmission service". ATC calcs need to be consistent. Uniform ATC calcs may not capture unique system conditions in a location resulting in equipment damage or underuse of the system. Calculations are done by "providers and owners" not "users" to facilitate "transmission service" not "transactions."	MAPP Planning Standards Subcommittee
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**Consideration:** The suggested changes were adopted.

purpose	The "NERC definition" for TTC/ATC, CBM, and TRM should be contained within each of the purpose statements. Each of the "Standards" should be self contained.	Raj Rana AEP
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**Consideration:** Definitions will be included in a separate glossary.

**Comments about Section 1**

R1-1, R1-1.5, Section 1 Non-Compliance Level 4, and Section 2 Non-Compliance Level 4 have "Regions" that should be changed to appropriate Functional Model entities.	Ed Davis Entergy
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**Consideration:** Agreed.

1) std 056 Section 1 -R1-1, second sentence: "The Regional Reliability Council's Transmission ..." shall be read instead of "The Region's Transmission ..." to be consistent with the Standard	Guy Zito NPCC Pete Henderson IMO
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**Consideration:** Agreed.

Section 1 -R1-1, item 5: "... for the Regional Reliability Council to grant ..." shall be read instead of "... for the Region to grant ..." to be consistent with the Standard	Guy Zito NPCC Pete Henderson IMO
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**Consideration:** Agreed.

3) std 056 Section 1 -Level of Non Compliance: Level 4 "Or the Regional Reliability Council..." shall be read instead of "Or the Region..." to be consistent with the Standard	Guy Zito NPCC Pete Henderson IMO
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**Comments on Standard 056**

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Consideration: In all the levels of non-compliance, the phrase, 'Regional Reliability Organization' was used for consistency.

Section 1 Levels of Non-Compliance has wording for ATC and TTC that should say "Transmission Reliability Margin" (Level 1 and Level 4)

Ed Davis Entergy

Consideration: Agreed – this has been corrected.

**Comments about Section 2**

R2-1 and R2-1c have references to "transmission provider"; should be as defined in the NERC Functional Model "Transmission Service Provider"

Ed Davis Entergy

Section 2 Levels of Non-Compliance references "transmission provider" should be as defined in the NERC Functional Model "Transmission Service Provider".

Consideration: Transmission provider was changed to Transmission Service Provider.

4) std 056 Section 2 -Compliance Monitoring Process:"Each Regional Reliability Council..." shall be read instead of "Each Region..." to be consistent with the Standard

Guy Zito NPCC

Pete Henderson IMO

Consideration: All levels of non-compliance were modified to reference the 'Regional Reliability Organization' rather than "Region" or Regional Reliability Council" for consistency.

**Standard 057**

**Summary Consideration:** Based on Industry comments, Sections 2- 5 will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on these sections of this standard.

The SDT made the following changes to Standard 057:

- Removed Sections 2, 3, 4, and 5 from Version 0
- In R1-1, added, 'generators' to the list of facility types that must be addressed in the documented facility connection requirements. Generators were erroneously omitted with the first draft of Version 0.
- Changed '30 business days' to '30 calendar days' to be consistent with other Version 0 standards.
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments or comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE
		Consideration: Measure 1 is a Phase I measure, revised in the set of revised Compliance Templates approved by the BOT in April 2, 2004 and will be retained in Version 0.	
		Measures 2, 3, 4 are in Phase 3; Measure 5 is in Phase 4. The 'incomplete' Phase 3 and Phase 4 standards have been removed from Version 0.	
		This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0	Guy Zito NPCC
		Consideration: Measure 1 is a Phase I measure, revised in the set of revised Compliance Templates approved by the BOT in April 2, 2004 and will be retained in Version 0.	
		Measures 2, 3, 4 are in Phase 3 and Measure 5 is in Phase 4 and are being removed from Version 0.	
1.F	M1,M5	Standard 057 - I.F.M1 should be revised because it does have enough specificity in equipment requirements. Standard 057 - I.F.M5 should be deleted from Version 0 because it shifts the burden from the Region to the members.	SPP

## Comments on Standard 057

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Consideration: The SDT is not charged with adding more details to existing requirements – this suggestion needs to be applied to Version 1.

Many commenters indicated that Phase 4 Planning Standards should be deleted and they will not be included in Version 0. Standard 057 – I.F.M5 was a Phase 4 Planning Standard and will not be included in Version 0.

IF	M1	This section needs to be revised. Its deficiencies have been identified by the NERC Interconnection Dynamics Working Group (IDWG). IDWG can help in revising this section. (Reference: IDWG Report to NERC Planning Committee (PC) at PC's 7/20/04 Meeting.)	Raj Rana AEP
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Consideration: The SDT is not charged with adding more details to existing requirements – this suggestion needs to be applied to Version 1.

### Comments on Section 1

Planning	R1-1.7	As defined, Regional Reliability Council's have the responsibility to identify who will perform maintenance and testing. Who exactly will be performing the maintenance and testing and will there be consistency in how the maintenance and testing is measured across regions?	Deanna Phillips BPA
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Consideration: Addressing the exact implementation of these standards is outside the scope of the SDT. The language used in the translation is an exact replication of the language in the existing requirement – adding more specificity is outside the scope of the SDT.

1	M1-1	The requirements of R1-1 do not state that the Regional Reliability Council's requirements have to be within a document (although they probably will be) so M1-1 may sound better by deleting ".. document with its .." so it refers to Regional Reliability Council's requirements.	MAPP Planning Standards Subcommittee
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Consideration: The SDT did add the word, 'document' based on its interpretation of what was intended – but has removed this from the revised draft of Version 0.

S-1	R1-1.3	Add digital inputs for breaker operation, etc. for sequence of events, harmonics for large HVDC installations, and sequence currents.	PSE&G
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Consideration: The suggested revision would expand the scope of what was in the original document and is outside the scope of the SDT.

	Add generation and load to applicable installation requirements	PSE&G
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**Comments on Standard 057**

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Consideration: Generators was missing from the SDTs copy of the source document and was omitted in error – this has been corrected. Adding 'load' would be an expansion of what was in the original document and is outside the scope of the SDT, but would be a valuable comment for consideration in Version 1.

Please add “c. generators” to Item 6 to make it compatible with Planning Standard I.F.M1 – verify with the standard R1-1 6 Ed Davis Entergy

Consideration: Generators was missing from the SDTs copy of the source document and was omitted in error – this has been corrected.

M1-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

1. Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Comments on Section 2 – This section has been removed from Version 0 – the SDT did not consider the individual comments.**

- |   |      |  |   |
|---|------|--|---|
| 2 |      | This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard  | Bob Millard<br>Main                     |
|   | R2-1 | R2-1 goes further than the existing standard I.F. by requiring the installation of disturbance monitors per regional requirements. We disagree that the guides section should be eliminated. These guides contain many critical items as stated in the black-out recommendations, such as the need for time synchronization and coordination with neighboring regions. | Ameren                                  |
| 2 | R2-1 | The word "Regional" should be replaced with "Regional Reliability Council" in order to fit with the NERC functional model.   | MAPP Planning<br>Standards Subcommittee |
|   |      | R2-1 and Section 5 Applicability say “Generation Owner” instead of “Generator Owner”, which is a Functional Model entity   | Ed Davis Entergy                        |
|   |      | Section 2 Measures should be M2-1 and M2-2, not M1 and M2  | Ed Davis Entergy                        |

**Comments on Standard 057**

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2	M1	It seems that M1 should be renamed as "M2-1" to conform to the rest of the Version 0 Standards.	MAPP Planning Standards Subcommittee
2	M2	It seems that M2 should be renamed as "M2-2" to conform to the rest of the Version 0 Standards.	MAPP Planning Standards Subcommittee
2	M2-3	M2-3 should be added to match up with Requirement R2-3? This Measurement could read as "The Transmission Owner and Generator Owner shall have evidence it provided current data on its disturbance monitoring equipment installations in accordance with Standard 057-R2-3." Measurements should align with the Requirements of a Standard and not the Levels of Non-Compliance.	MAPP Planning Standards Subcommittee
		Section 2 Levels of Non-Compliance Level 3 should say "three, four, or five" NOT "three, for, or five"	Ed Davis Entergy

**Comments on Section 3 – This section is being removed from Version 0 – the SDT did not consider the individual comments.**

3		This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard	Bob Millard Main
		Overall Applicability Section 3 should be appropriate entity according to the Functional Model in place of Regional Reliability Councils and Section 5 should be Planning Authority, Transmission Planner, and Generator Owner	Ed Davis Entergy
3	R3-1	Include Item 7. Point of Contact for delivery of required data.	Charles Matessa BG&E
3	R3-1	The use of the word "entities" seems very broad after the development of the NERC functional model. Is there some specific titles that can be assigned to entities within R3-1 that are included as part of the NERC functional model, such as "Generator Owner" and "Transmission Owner"?	MAPP Planning Standards Subcommittee
3	R3-2	The use of the word "Regional disturbance data reporting requirements" seems a bit repetitive since "Regional Reliability Council" had been used previously in the same sentence. The word "Regional" could be deleted in that reference to disturbance data	MAPP Planning Standards Subcommittee

**Comments on Standard 057**

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reporting requirements.

R3-2 references 5 business day requirement while Section 3 Compliance says 30 business days Ed Davis Entergy

M3-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

**Comments on Section 4 – This section is being removed from Version 0 – the SDT did not consider the individual comments.**

4 This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard Bob Millard Main

4 R4-1 The requirement in this draft suggests that all disturbance data shall be provided to the RRC on request, and would result in the reporting of several years of data for all available recording equipment. Please change this requirement to indicate "all relevant data" or "all data as specified by the RRO". Consumers

Possessive form of "Transmission Owner" should be used in M4-1 Ed Davis Entergy

M4-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

Semicolon needed in Section 4 Levels of Non-Compliance Level 1 before "however" Ed Davis Entergy

**Comments on Section 5 – This section is being removed from Version 0 – the SDT did not consider the individual comments.**

5 This section should not move forward in Version 0. Not well defined and/or detailed, needs further drafting for implementation Bob Millard Main

Applicability Applicability for Section 5 was omitted. FRCC

Standard Applicability for Section 5 was omitted Bryan Guy  
Applicability Progress

**Comments on Standard 057**

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		Comma needed after "Transmission Planner" in Section 5 Requirements	Ed Davis Entergy
5	Applicability	The Applicability of 057 Section 5 includes a reference to "Generation Owner" instead of "Generator Owner" as identified in the NERC functional model.	MAPP Planning Standards Subcommittee
5	M5-1	Delete proposed Measure; not measurable.	Raj Rana AEP
		Possessive forms of "Planning Authority " and "Transmission Planner" should be used in M5-1	Ed Davis Entergy
5	Levels of Non-Compliance	The levels of Non-compliance need to be transferred to the new Version 0 Standards.	MAPP Planning Standards Subcommittee
		No Section 5 Levels of Non-Compliance shown	Ed Davis Entergy

**Standard 058**

**Summary Consideration:**

The SDT made the following changes to Standard 058:

- Shortened the title by eliminating the phrase, 'and Development of System Models'
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments and comments on the entire standard**

Section	Requirement or Measure	Comment	Commenter
		We suggest modifying the title to delete "and Development of System Models" because of the potential for confusion with models that would be in the power system simulation programs. This standard should only address the provision of system modeling data, not the development of program models to model power system devices.	Peter Mackin TANC
<b>Consideration: Agreed. This change was implemented</b>			
Standard Applicability		Not all of these Functions accurately reflect the NERC Functional Model. Replace "Transmission System Owners" with "Transmission Owners" and "Generation Owners" with "Generator Owners".	MAPP Planning Standards Subcommittee
<b>Consideration: Agreed. This change was implemented</b>			
6	R6-2	In R6-2, a few of the words in the last sentence duplicate an earlier stated concept. Delete "shall be provided".	
<b>Consideration: The redundant words were eliminated as suggested.</b>			
		title seems inconsistent with R5-1. Title indicates "Applicability in Eastern Interconnection..." while R5-1 indicates "each of the NERC interconnections..."	Paul Arnold BPA
<b>Consideration: There is a statement within R5-1 that requires the RROs within the Eastern Interconnection to work together to develop Interconnection steady state models.</b>			

**Comments on Standard 058**

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II.A.M1,  
II.A.M3.

The Applicability of this standard is correctly assigned to multiple parties. The only exception is assigning applicability to the Planning Authority. The Planning Authority should gather, review and utilize this information for its reliability assessment - not develop the information. The rest of the entities in a Region may chose to report "upward" to the Planning Authority. However, the other organizations would retain accountability for the information reported to the Planning Authority.

Bill Bojorquez  
ERCOT

**Consideration:** The Planning Authority does provide data used for the Multi-model Working Group and it is appropriate for inclusion in this standard.

Standard  
Applicability

Not all of these Functions accurately reflect the NERC Functional Model. Replace "Transmission System Owners" with "Transmission Owners" and "Generation Owners" with "Generator Owners".

MAPP Planning  
Standards  
Subcommittee

**Consideration:** Agreed, however the 'Applicability' section isn't included in the format for Version 0.

Standard  
Applicability

Existing Document Language for M5 and M6. Replace "Regions" with "Regional Reliability Councils."

MAPP Planning  
Standards  
Subcommittee

**Consideration:** Agreed. This change was implemented

All All

Add a clause to reflect the need to protect the confidentiality of data. Refer to FERC Critical Energy Infrastructure Information provisions.

MAPP Planning  
Standards  
Subcommittee

**Consideration:** This would be an expansion on the existing language and is outside the scope of the SDT.

All All

Comments about the Drafting Team's thinking in the translation are not provided on all but a few pages of this standard. It would be helpful to provide additional comments.

MAPP Planning  
Standards  
Subcommittee

**Consideration:** Agreed. The SDT defaulted to only including comments in areas where we felt the industry may question the origin or placement of text.

**Comments on Standard 058**

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All Compliance Each process calls for reporting procedures within 30 business days. However the levels of non-compliance do not use on-time or lateness as an aspect of non-compliance. MAPP Planning Standards Subcommittee

Consideration: The SDT changed all the references in all Version 0 planning standards to either state 'within 5 business days' or to state 'within 30 calendar days'. If the levels of non-compliance in the source document did not indicate that timeliness was a factor, then the SDT did not add details to include timeliness in the Version 0 levels of non-compliance. Improving the levels of non-compliance is appropriate for Version 1.

- On the last paragraph "... provided to the Regional Reliability Councils and NERC..." shall be read instead of "... provided to the Regions and NERC.." to be consistent with the Standard. Pete Henderson IMO  
Guy Zito NPCC

Consideration: Throughout the Version 0 standards, the phrase, "Regional Reliability Councils" was changed to "Regional Reliability Organizations."

Add a section on static VAR devices PSE&G

Consideration: This change would expand the scope of the existing requirements and are outside the scope of the SDT's work for Version 0 – this should be suggested as a change for Version 1.

Add no-load taps for voltage and angle; and type of cooling (FOA units can not be used during black start) PSE&G

Consideration: These changes would expand the scope of the existing requirements and are outside the scope of the SDT's work for Version 0 – this should be suggested as a change for Version 1.

**Comments on Purpose**

Purpose Add more of the language from S1 to the purpose. A lot is lost in the translation as to the true purpose of the standard. Add "Electric system data required for the analysis of the reliability of the interconnected transmission system shall be developed and maintained." MAPP Planning Standards Subcommittee

Consideration: The 'purpose' statement should tell 'Why' the standard is needed for reliability. Most entities agreed with the proposed 'Purpose' so no change was made.

**Comments on Section 1**

## Comments on Standard 058

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S-1                      While data on equipment is understandable, schedules for transactions between regions but within the same RTO do not make sense.                      PSE&G

**Consideration:** The SDT was charged with 'translating' existing requirements and the language in R1-1 is an exact translation of existing language.

1                              This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard                              Bob Millard  
MAIN

**Consideration:** The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

### Comments on Section 2

2                              This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard                              Bob Millard  
MAIN

**Consideration:** The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

Section 2    Compliance    The Drafting Team dropped the data requirements and reporting procedures on page 7 of 19 from the compliance monitoring. There is no explanation for this change. Please add a comment.                      MAPP Planning  
Standards Subcommittee

**Consideration:** This requirement (Data requirements and reporting procedures: on request (5 business days). ) was included in R2-2.

S-2                      R2-1.2                      Add induction generators; governor dead band, droop and limits; generator step up transformer data and taps; metering; and auxiliary system limitations on generator voltage.                      PSE&G

**Consideration:** These changes would expand the scope of the existing requirements and are outside the scope of the SDT's work for Version 0 – this should be suggested as a change for Version 1.

## Comments on Standard 058

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2            R-2            In R2-2, the last few words should be deleted because it duplicates a section of the sentence. Delete "on request (five business days)" at the end of R2-2.            Peter Mackin  
TANC

Consideration: Agreed. This change was implemented

### Comments on Section 3

3                            This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard            Bob Millard  
MAIN

Consideration: The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

3            R3-1 and            R3-1 references 'reporting procedures of Reliability Standard 058-R4". this should            Raj Rana  
R3-2            reference the specific Measure 058-R4-1. Similar improper reference for R3-2. Levels of            AEP  
Non Compliance (Levels 1 and 3) should also properly reference.

Consideration: Agreed – these changes were adopted.

### Comments on Section 4

4                            This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard            Bob Millard  
MAIN

Consideration: The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

S4            R4-1.3            The use of a conservative model is applicable.            Robert Snow

Consideration: The SDT interpreted this comment as a suggested revision to the existing requirement, and modifying the intent of existing requirements is outside the scope of the SDT.

Section 4    R4-1            In 2., replace "quadrate" with "quadrature" and "reactance's" with "reactances". In 3. ,            MAPP Planning

## Comments on Standard 058

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add common abbreviations back including SVC, HVDC, STATCOM, and FACTS.

Standards Subcommittee

Consideration: The typographical errors have been corrected. The format of the Reliability Standards doesn't include use of acronyms.

### Comments on Section 5

S5 R5-1 Solved cases without any violations should be the basic requirement.

Robert Snow

Consideration: This would be a revision to the existing requirement, and modifying the intent of existing requirements is outside the scope of the SDT. This should be suggested for Version 1.

- "Standard 058-R5-1" shall be read instead of "Standard II.A.M5".

Pete Henderson IMO

Consideration: Agreed – the change has been made.

5 M5 The second sentence of the first paragraph states, "Violations will not be assessed for data sets posted by the scheduled dates". Remove this sentence because it is clearly in conflict with Level 1 non compliance, which states that data sets posted with errors or in an unsolved state are in violation.

Frank McElvain  
Tri-State G&T

Consideration: The SDT added a footnote to clarify what was intended.

5 1 The terms "near-term" and "long-term" are ambiguous. Suggest defining near-term to be within five years and long-term to be beyond ten years.

Frank McElvain  
Tri-State G&T

Consideration: The language used in Version 0 is an exact duplication of the existing language. These terms are defined in Standard 051.1-R1-1.2

5 M5 The second sentence of the first paragraph states, "Violations will not be assessed for data sets posted by the scheduled dates". Remove this sentence because it is clearly in conflict with Level 1 non compliance, which states that data sets posted with errors or in an unsolved state are in violation.

Frank McElvain  
Tri-State G&T

Consideration: The SDT added a footnote to clarify what was intended.

Section 5 Levels of These levels are very detailed. The levels in other sections of this standard are not as

MAPP Planning

**Comments on Standard 058**

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	Non Compliance	detailed. Make the levels of compliance more consistent from section to section of this same standard.	Standards Subcommittee
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Consideration: Altering the levels of non-compliance is outside the scope of the SDT – this is a change that should be addressed in Version 1.

**Comments on Section 6**

6	R6-1	Requirement has incorrect reference to IIA.M5, should reference Reliability Standard 058-R5-1	Raj Rana AEP
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Consideration: Agreed – this has been changed.

Section 6	R6-1	Incorrect reference of Standard II.A.M5. Needs to be updated to new Standard number	FRCC Bryan Guy Progress
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Consideration: Agreed – this has been changed.

5) std 058 Section 6 -R6-1:- “Standard 058-R5-1” shall be read instead of “Standard II.A.M5”.	Guy Zito NPCC Pete Henderson IMO
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Consideration: Agreed – this has been changed.

Section 6	Levels of Non Compliance	These levels are very detailed. The levels in other sections of this standard are not as detailed. Make the levels of compliance more consistent from section to section of this same standard.	MAPP Planning Standards Subcommittee
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Consideration: The levels of non-compliance are an exact translation, with nothing added or deleted from the source document. Making changes to bring consistency to the levels of non-compliance from standard to standard needs to be addressed in Version 1.

6	M6	Same comment as above for M5.	Frank McElvain Tri-State G&T
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Consideration: The SDT added a footnote to clarify what was intended.

**Standard 059**

**Summary Consideration:** Based on Industry comments, this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on this standard.

**General comments or comments on the entire standard**

Section	Requirement or Measure	Comment	Commenter
		This entire standard should not move forward in Version 0. The NERC CTTF chose to remove a II.B Compliance template from the group approved by the NERC BOT 4/2/04 and assigned the subject review work to the NERC OC. This work should be expedited as best possible.	Bob Millard MAIN
		Missing "Applicable to" information throughout	Ed Davis Entergy
		This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0	Guy Zito NPCC
		This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE
All	All	MEC is concerned with the extraordinary cost and effort that is required by this standard for generator testing. MEC urges the Drafting Team or NERC to pick out a few parameters that are relatively easy and safe to test for and that are clearly needed for system reliability and leave the rest of this standard as a guide.	Tom Mielnik MidAmerican
General		The stated purpose of this standard is to validate generator modeling data with real data. There are a number of ways to obtain the data and all approaches should be considered acceptable.	Robert Snow
		Need another space after II.B. on page 1 under Existing Document Language	Ed Davis Entergy

**Comments on Section 1**

## Comments on Standard 059

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1	R1-2	Presumably. the 'reporting parties' are the entities within the region required to provide data. If so, clarity on who the 'reporting parties' are would be beneficial.	Raj Rana AEP
		6) std 059 Section 1 -Level of Non Compliance: Level 2"... of Regional Reliability Council procedures ..." shall be read instead of "... of Regional procedure ..." to be consistent with the Standard.	Guy Zito NPCC Pete Henderson IMO
		Section 1, M1-2 states that "the Regional Reliability council shall have evidence it provided documentation of its procedures. . ." Do we really need a requirement stating that they be able to provide evidence that they provided information? This occurs throughout the Planning Standards	Ed Davis Entergy

### Comments on Section 2

Section 2	M2-2	Specific test requirements should be included in this standard that address; the "conditions" to be reported, whether max/min temperatures are to be stated, whether the generator summer and winter test can be completed at the same time and avoid a second annual test, and data be corrected for the conditions of the test.	FRCC
		7) std 059 Section 2 -R2-1, fifth paragraph: "... requested by the Regional Reliability Council shall ..." shall be read instead of "... requested by the Region shall ..." to be consistent with the Standard.	Guy Zito NPCC Pete Henderson IMO
	R2-1	Net and gross output verification should only be conducted one time each year during the peak season. If a second test is required by the region then a mechanism must be in place to reimburse the generator for conducting the second test. Otherwise, if output data is needed for a different time of the year the data from the peak season test should be used and temperature compensated for the period in question.	Tom Brandish Reliant

### Comments on Section 3

**Comments on Standard 059**

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Sections 3, 4, 5, and 6	R3, R4, R5, and R6	<p>MAPP is concerned with the extraordinary cost and effort that would be required if Sections 3 through 6 of this standard for generator testing is adopted for compliance. Further, MAPP is concerned that such testing has the possibility of causing generator damage under certain circumstances for certain facilities. MAPP urges the Drafting Team or NERC to pick out a few parameters that are relatively easy and safe to test for and that are clearly needed for system reliability and leave the rest of these sections as a guide. Also, MAPP urges the Drafting Team to provide for a transition period of five or more years for compliance with these standards which have not been field tested</p>	MAPP Planning Standards Subcommittee
		<p>8) std 059 Section 3 -R3-1, sixth paragraph:“... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.</p>	Guy Zito NPCC Pete Henderson IMO
	R3-1	<p>Reactive capability is important to system reliability and Reliant supports system reliability. Reactive testing can present risks to system operation. Looking at unit response when a disturbance occurs on the system may be a better measure of unit reactive capability. It is recommended that units under 50 MW's and that operate less than 100 hours should be exempted from this test.</p>	Tom Brandish Reliant
		<p>R3-1 – should they be required to submit reactive capability curves?</p>	Ed Davis Entergy
		<p>R3-1.a – Should hydrogen pressure be included in the list of functional variables along with real power output, and generator voltage?</p>	

**Comments on Section 4**

Sections 3, 4, 5, and 6	R3, R4, R5, and R6	<p>MAPP is concerned with the extraordinary cost and effort that would be required if Sections 3 through 6 of this standard for generator testing is adopted for compliance. Further, MAPP is concerned that such testing has the possibility of causing generator damage under certain circumstances for certain facilities. MAPP urges the Drafting Team or NERC to pick out a few parameters that are relatively easy and safe to test for and that are clearly needed for system reliability and leave the rest of these sections as a guide. Also, MAPP urges the Drafting Team to provide for a transition period of five or more years for compliance with these standards which have not been field tested</p>	MAPP Planning Standards Subcommittee
		<p>9) std 059 Section 4 -R4-1, first &amp; second paragraph:- “... provide the Regional Reliability Councils with ...” shall be read instead of “... provide the Regions with ...” to be consistent with the Standard.</p>	Guy Zito NPCC Pete Henderson IMO

**Comments on Standard 059**

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R4-1	Generator voltage regulator testing on units with older analog systems do not have provisions to determine the mentioned data points without extensive additional test equipment. If this test is required by the region then a mechanism needs to be in place to reimburse the generator for conducting this test. It is recommended that units under 50 MW's and that operate less than 100 hours should be exempted from this test.	Tom Brandish Reliant
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**Comments on Section 5**

Section 5	M5-1 and M5-2	Specific test requirements should be included in this standard. In addition, to a procedure or guidelines for data collection to ensure uniformity.	FRCC
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R5-1 – should they be required to submit graphs of the governor droop characteristics?	Ed Davis Energy
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Sections 3, 4, 5, and 6	R3, R4, R5, and R6	MAPP is concerned with the extraordinary cost and effort that would be required if Sections 3 through 6 of this standard for generator testing is adopted for compliance. Further, MAPP is concerned that such testing has the possibility of causing generator damage under certain circumstances for certain facilities. MAPP urges the Drafting Team or NERC to pick out a few parameters that are relatively easy and safe to test for and that are clearly needed for system reliability and leave the rest of these sections as a guide. Also, MAPP urges the Drafting Team to provide for a transition period of five or more years for compliance with these standards which have not been field tested	MAPP Planning Standards Subcommittee
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10) std 059 Section 5 -R5-1, second paragraph:“... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.	Guy Zito NPCC Pete Henderson IMO
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R5-1	Generator governor droop on units with older analog systems was preset at the factory. Additional test equipment is required to conduct this test. If this test is required by the region, then a mechanism needs to be in place to reimburse the generator for conducting this test. It is recommended that units under 50 MW's and that operate less than 100 hours should be exempted from this test.	Tom Brandish Reliant
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**Comments on Section 6**

Section 6	M6-1 and M6-2	Specific test requirements should be included in this standard. In addition, to a procedure or guidelines for data collection to ensure uniformity.	FRCC
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Comments on Standard 059

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Sections 3, 4, 5, and 6	R3, R4, R5, and R6	<p>MAPP is concerned with the extraordinary cost and effort that would be required if Sections 3 through 6 of this standard for generator testing is adopted for compliance. Further, MAPP is concerned that such testing has the possibility of causing generator damage under certain circumstances for certain facilities. MAPP urges the Drafting Team or NERC to pick out a few parameters that are relatively easy and safe to test for and that are clearly needed for system reliability and leave the rest of these sections as a guide. Also, MAPP urges the Drafting Team to provide for a transition period of five or more years for compliance with these standards which have not been field tested</p> <p>- "... requested by the Regional Reliability Council shall ..." shall be read instead of "... requested by the Region shall ..." to be consistent with the Standard.</p>	<p>MAPP Planning Standards Subcommittee</p> <p>Guy Zito NPCC Pete Henderson IMO</p>
	R6-1	<p>Generator excitation system tests that require tripping a unit even at low output values is a concern for potential equipment damage. It is recommended that units under 50 MW's and that operate less than 100 hours should be exempted from this test. Also, it is unrealistic to require data on a new excitation system 1 year in advance. This information is not established that early in the process.</p>	<p>Tom Brandish Reliant</p>

**Standard 060**

**Summary Consideration:** The SDT made the following changes to Standard 060:

- Changed R1-2 and M1-2 to include the phrase, 'facility and equipment ratings' rather than the 1<sup>st</sup> draft's use of the phrase, 'facility ratings'.
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		Change title to "Electrical Facility Ratings" to better describe the Standard.	Peter Mackin TANC
		THIS HAS NOT BEEN FIELD TESTED PRIOR TO SUCH AN WIDE SCALE IMPLEMENTATION. ADDITIONALLY, LANGUAGE IS NEEDED IN THIS STANDARD THAT EXPLICITLY REQUIRES COMPARABLE TESTING REQUIREMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION	Mike Gildea Constellation

**Consideration:** Since other commenters didn't oppose the suggested title, the SDT did not make this change.

**Consideration:** This standard was field tested – standards that have not been field tested have been removed from Version 0.

**Comments on Section 1**

1	R1-1	Version 0 includes Generation Owner, but the old planning standard appears to exclude the Generation Owner (note that generators are not in the list of R1-1). Inclusion of the generation owner in 060 appears to be redundant with the generation requirements of 059. Suggest that generation owner be removed from this Standard.	Raj Rana AEP
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**Consideration:** Since terminal equipment and generator step up transformers can be owned by 'Generator Owners' Generator Owners may be assigned responsibility for this requirement. In reviewing the list of applicable functions, the SDT noted that there may be some facilities owned by Distribution Providers that is addressed by this standard – and the SDT will ask the industry for support in adding the DP to the list of entities responsible for this requirement.

R1-1.1 – should relays be listed along with the other equipment in a-g?

Ed Davis  
Entergy

Consideration: No – they are covered in R1-1.3.

R1-1 Why is the Generator Owner included in here?

Consideration: Since terminal equipment and generator step up transformers can be owned by 'Generator Owners' Generator Owners may be assigned responsibility for this requirement. In reviewing the list of applicable functions, the SDT noted that there may be some facilities owned by Distribution Providers that is addressed by this standard – and the SDT will ask the industry for support in adding the DP to the list of entities responsible for this requirement.

1	R1-2	R1-2 seems to use "transmission facility ratings" in place of "electrical facility and equipment ratings" as stated above in R1-1. The use of "facility ratings" is once again used within M1-1.	MAPP Planning Standards Subcommittee
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Consideration: This was an error in the SDT's version of the source document and has been corrected in the revised draft of Version 0.

Section 1 Measure	M1-1	This measure states that the Transmission Owner or Generator owner "shall provide documentation ", but there is no indication of which entities will receive the documentation.	FRCC
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Consideration: The standard states that documentation must be provided as specified in .... and the reference indicates which entities must be provided with the documentation.

1	M1-1	The documentation indicating the type of methodology used for determining facility ratings is outlined in R1-1. This requirement should have one measurement such as "The Transmission Owner or Generator Owner shall provide documentation that the methodology(ies) used for determining facility ratings meets the requirements of Standard 060-R1-1." A separate Measure should be added (M1-2) for 060-R1-2.	MAPP Planning Standards Subcommittee
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Consideration: The Standards Development Process requires that there be a measure for each requirement, but does not preclude a single measure for being used for more than one requirement – in other words, a 'one for one' relationship is not mandated.

## Comments on Standard 060

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1	M1-2	R1-2 should have a measure to go along with it. A suggested M1-2 could read as "The Transmission Owner or Generator Owner shall have evidence it provided documentation of the methodology(ies) used to determine its electrical facility and equipment ratings in accordance with Standard 060-R1-2." Measurements should align with the Requirements of a Standard and not the Levels of Non-Compliance.	MAPP Planning Standards Subcommittee
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Consideration: The Standards Development Process requires that there be a measure for each requirement, but does not preclude a single measure for being used for more than one requirement – in other words, a ‘one for one’ relationship is not mandated.

1		Change time frame for compliance to 30 days. The time frame from the original compliance template appears to have been copied over incorrectly.	Peter Mackin TANC
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Consideration: The source document used the phrase, ‘On request (five business days)’ and this was copied into the translation.

## Comments on Section 2

2		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 058. In addition it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard	Bob Millard MAIN
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Consideration: There wasn't industry consensus on whether to try to eliminate all requirements that appeared redundant, so the SDT defaulted to retaining the requirements so it is easier for the industry to verify that all requirements were translated into Version 0.

2	R2-1	The word "Transmission owner" should be capitalized to "Transmission Owner" to properly be identified within the NERC functional model.	MAPP Planning Standards Subcommittee
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Consideration: Agreed.

2	R2-2	Change "Transmission Facility" to "Facility" to more closely match the existing template.	Peter Mackin TANC
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Consideration: R2-2 was formed by combining the existing M2 paragraphs – and in some places the phrase, ‘facility’ is used, but in other places, ‘transmission facility’ is used. Because ‘transmission facility’ is more descriptive, this is the phrase the SDT used. Since no other commenters objected to this translation, the text was not changed.

## Comments on Standard 060

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2	M2-2	M2-2 needs to be added to go along with R2-2. It could read as "The Transmission Owner or Generator Owner shall have evidence it provided the normal and emergency ratings of all its transmission facilities in accordance with Standard 060-R2-2." Measurements should align with the Requirements of a Standard and not the Levels of Non-Compliance.	MAPP Planning Standards Subcommittee
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Consideration: The Standards Development Process requires that there be a measure for each requirement, but does not preclude a single measure for being used for more than one requirement – in other words, a 'one for one' relationship is not mandated.

**Standard 061**

**Summary Consideration:** Based on Industry comments, sections 2 and 3 of this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on those sections of this standard. Sections 1 and 4-8 will be included in Version 0.

The SDT made the following changes to Standard 061:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Updated the Compliance Monitor to indicate whether this is the Regional Reliability Organization or an Unaffiliated Third Party
- Made minor format changes for consistency

**General comments and comments about the entire standard**

Section	Requirement or Measure	Comment	Commenter
		Purpose indicates "To ensure that assessments and validation of past events AND DATABASES...". The words shown in capitals seem to confuse the description and should be removed. These words do not appear to be included in the existing criteria.	Paul Arnold BPA
		<b>Consideration:</b> The phrase, '. . . and Databases. . .' was copied from the source document's introduction and is an even translation.	
		Standard Applicability includes the numbering from the old criteria and needs to be updated to correspond to the new standard.	Paul Arnold BPA
		<b>Consideration:</b> The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.	
		This standard is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Based on the assumption that the subject material is essentially already covered by EIA, FERC, etc. requirements, this entire standard should not move forward in Version 0.	MAIN
		<b>Consideration:</b> The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.	
		The proposed standard (61) appears to be consistent with the previous standards and we have no comments.	WECC

Comments on Standard 061

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Consideration: The SDT appreciates your comments and support.

Overall Standard Applicability should be changed to reflect Section numbers rather than Planning Standard numbers.

Ed Davis  
Entergy

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

Standard  
Applicability

Improper standard reference, need Version 0 Standard references.

Raj Rana AEP

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

- "Section 1, 2, 3, 4, 5, 6, 7 & 8" shall be read instead of "II.D.M1, II.D.M2, II.D.M3, II.D.M4, II.D.M6, II.D.M10, II.D.M11 & II.D.M12".

Guy Zito NPCC  
Pete Henderson  
IMO

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

Original standards III A S1,M1 and III A S2,M2 are missing from the document. It is an important reliability test to check the impact of protection system redundancy and to develop mitigation plans.

MAPP Planning  
Standards  
Subcommittee

Consideration: This comment is in the wrong place. However, measurements III.A.M1 and III.A.M2 are no longer applicable measurements. They have been deleted / modified / absorbed into other standards.

11) std 061 Standard Applicability:- This standard is applicable to the Regional Reliability Councils which are not defined in the NERC's Functional Model.

Guy Zito NPCC

Consideration: This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.

Standard Applicability - the New Language needs to reference the R1-1 format and not the old

Charles Matessa

II.D.M1, etc. format.

BG&E

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

Applicability Should reference the Sections not the existing Planning Standards used for translation.

FRCC

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

Many Applicability Add the LSE and the Distribution provider to those supplying data.

Robert Snow

Consideration: The Load Serving Entity is already identified as an entity required to submit data. The distribution provider (a wires-owner) is not an appropriate entity for providing data under this standard.

This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0

Brandian ISO-NE

Guy Zito NPCC

Consideration: II.D.M1, II.D.M4, II.D.M6, II.D.M10, II.D.M11, and II.D.M12 are Phase 1 and Phase 2 measurements, and will remain in Version 0. II.D.M2 and II.M.3 are Phase 4 measurements, and will not be retained in Version 0.

It is not clear what benefit would be gained from describing the procedure by which a reporting entity eliminates double counting and avoids omitting loads in reports. In contrast, there is no similar requirement described for ensuring that generating capability is reported on a consistent basis, or that transmission line length is measured accurately. It would be sufficient to simply state, in written documentation accompanying load data submittals, that care has been taken to avoid such errors, without describing in detail each step taken to ensure information is accurate and reliable.

Frank McElvain

Tri-State G&T

Consideration: Agreed, however the SDT's assignment was to make a clean translation of existing documents – where those documents contained ambiguous or superfluous statements, the associated Version 0 documents will also contain ambiguous or superfluous statements. Changing the level of detail is beyond the scope of the SDT and needs to be addressed in Version 1

## Comments on Standard 061

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### Comments about Purpose

Purpose Include the third paragraph from the existing document into the new language to better define the level of data required. Robert Snow

Consideration: The contents of paragraph three are repeated again as Requirement R4-1.

### Comments about Section 1

Standard Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Consumers  
Applicability Entity, Planning Authority and Resource Planner (Sections 3-8)

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

Section 1 R1-2 This requirement states that data will be available on request, but there is no indication of to whom. FRCC

Consideration: The Compliance Monitor was added to clarify this issue.

Section 1 M1-1 This measure states that the Planning Authority and RRC "shall provide evidence", but there is no indication of which entities will receive the evidence. FRCC

Consideration: The Compliance Monitor was added to clarify this issue.

Section 1 Levels of Non Compliance Replace "The Region and the entities responsible for the reliability of the interconnected transmission systems" with "Planning Authority and Regional Reliability Council". MAPP Planning Standards Subcommittee

Consideration: Agreed. However this phase wasn't needed in the levels of non-compliance and was deleted.

1 Levels of Non Compliance "the entities responsible for the reliability of the interconnected systems" should be changed to the Planning Authority. Bryan Guy Progress

Consideration: Agreed. However this phase wasn't needed in the levels of non-compliance and was deleted.

**Comments on Standard 061**

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Section 1	Levels of Non Compliance	Any references to “entities responsible for the reliability of the interconnected transmission systems” should be revised to address specific Functional Model entities for this section it would be the Planning Authority.	FRCC
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**Consideration:** Agreed. This phrase wasn't needed and was deleted.

12) std 061 Section 1 -Level of Non Compliance: Level 1 & 4:“The Regional Reliability Council and the ...” shall be read instead of “The Region and the ...” to be consistent with the Standard.	Guy Zito NPCC Pete Henderson IMO
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**Consideration:** This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.

Section 1: Delete the Regional Reliability Council from the “Section 1 Compliance Monitoring Process”. The RRC should not be monitoring itself for Compliance.	Ed Davis Entergy
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**Consideration:** Agreed. Changed to an independent third party.

**Comments about Section 2 – This section is a Phase 4 measurement, and will not be included in the Version 0 Standards.**

Standard Applicability	Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)	Consumers
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2	R2-1	As in R1-1, Version 0 reference the Generation owner, but lists transmission facilities. If a generation owner (such as an IPP) also owns transmission facilities, such as terminal equipment, then that generation owner is also a transmission owner.	Raj Rana AEP
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13) std 061 Section 2 -R2-2:“... to the Regional Reliability Councils and NERC.” shall be read instead of “... to the Regions and NERC.” to be consistent with the Standard	Guy Zito NPCC Pete Henderson IMO
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Section 2 Measures	M2-1	This measure states that the Load Serving Entity, Planning Authority and Resource Planner “shall provide evidence “, but there is no indication of which entities will receive the evidence.	FRCC
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**Comments about Section 3 – This section is a Phase 4 measurement, and will not be included in Version 0 Standards.**

**Comments on Standard 061**

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Standard Applicability	Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)	Consumers
	R3-1 – no translation was attempted	Ed Davis Entergy
	Recently, WECC members were asked to provide load information aggregated on a “Control Area” basis. The term, “Control Area”, does not appear in Section 3’s list of aggregation levels. To be sure, the term “subregional” may be interpreted to include Control Areas, but it would be clearer if the term “subregional” were replaced with “subregional or control-area”.	Frank McElvain Tri-State G&T
3	Requirement not measurable, delete section.	Raj Rana AEP
S3	The requirements from the existing document should be included in the new language. Do not understand why no translation was attempted.	Robert Snow
3	Has this section been dropped?	Bryan Guy Progress
	There is no translation of Version 0 Standard attempted for this section. Is this intentional?	Pete Henderson IMO
Section 3	Levels of Compliance	Resolve what the Levels of Non Compliance should be so that this standard is complete.
		MAPP Planning Standards Subcommittee
	14) std 061 Section 3 - Requirements: Measures: Level of Non Compliance: There is no translation of Version 0 Standard attempted for this section. Is this intentional?	Guy Zito NPCC Pete Henderson IMO
	Section 3 Levels of Non-compliance – no translation was attempted	Ed Davis Entergy

**Comments about Section 4**

standard applicability	Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)	Consumers
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Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

R4-1	The existing language has the data maintained on an aggregated regional, subregional, power pool and individual system basis. The new language has the same list of entities but has an "or" in the sentence. The new language should require all of the same reporting levels. The determination of Deliverability requires detailed load modeling.	Robert Snow
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Consideration: The existing language has the word 'or' in it. The translation is correct.

4	Requirements includes the phrase "entities responsible for the reliability". Shouldn't this phrase be updated to include Functional Model terms?	Paul Arnold BPA
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Consideration: Agreed. This phrase was not needed and was deleted.

15) std 061 Section 4 -R4-1:"...to NERC, the Regional Reliability Councils, and ..."	shall be read instead of "...to NERC, the Regions, and ..." to be consistent with the Standard.	Guy Zito NPCC Pete Henderson IMO
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Consideration: This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.

Section 4 Measures	M4-1	This measure states that the Planning Authority and RRC "shall provide evidence ", but there is no indication of which entities will receive the evidence.	FRCC
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Consideration: The Compliance Monitor was added to clarify this issue.

Section 4	Levels of Non Compliance	Any references to "entities required by Region" should be revised to address specific Functional Model entities.	FRCC
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**Comments on Standard 061**

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Consideration: Agreed. This phrase was not needed and was deleted.

Section 4	Levels of Compliance	Replace "Region" with "Regional Reliability Council".	MAPP Planning Standards Subcommittee
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Consideration: This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.

16) std 061 Section 4 -Level of Non Compliance: Level 1, 2, 3 & 4:"... required by the Regional Reliability Council to report ..." shall be read instead of "... required by the Region to report ..." to be consistent with the Standard.	Guy Zito NPCC Pete Henderson IMO
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Consideration: This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.

**Comments about Section 5**

Standard Applicability	Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)	Consumers
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Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

5	includes "non-member demand data". Can this term be defined better using Functional Model terms?	Paul Arnold BPA
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Consideration: The SDT could not identify a more applicable term.

5	Levels of Non-Compliance - needs to reference the new format; as written, the reference pertains to a) and b) which is the old format.	Charles Matessa BG&E
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Consideration: Agreed. Changed to "... for Reliability Standard 061.5-R51- items a) or 061.5-R51- b) . . ."

5	1	This is a good step in the right direction, but the term "uncertainties" is ambiguous. Would this be standard load forecast error due to statistical methods used, or normal variations due to weather	Frank McElvain
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**Comments on Standard 061**

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or economic conditions, or some other quantity? The requirement for addressing uncertainties in load data submittals should be limited to reporting the magnitude of load forecast trends, and any allowances included for load forecast uncertainty. In other words, the report documentation should include • average annual load growth for the first 5 years of the forecast period, and • a demand variation allowance, based on how much the actual peak load has differed from forecast load in prior years. These quantities might best be reported on a percentage basis. Here is text for Section 5 that would accomplish this: b. specify the percent average annual load growth for the first five years of the forecast period c. specify any margin used to reflect maximum likely amount by which actual peak demands could exceed forecast values.

Tri-State G&T

Consideration: Agreed, however the SDT's assignment was to make a clean translation of existing documents – where those documents contained ambiguous or superfluous statements, the associated Version 0 documents will also contain ambiguous or superfluous statements. Changing the level of detail is beyond the scope of the SDT and needs to be addressed in Version 1

Section 5      Levels of      Should be revised to reference requirements associated with Section 5 not items (a) and (b).      FRCC  
                  Non  
                  Compliance

Consideration: Agreed. Changed to "... for Reliability Standard 061.5-R51- items a) or 061.5-R51- b) ..."

17) std 061 Section 5 -Level of Non Compliance: Level 1 & 2:"... on items 1. or 2. was not ..."  
shall be read instead of "... on items a) or b) was not ..." to be consistent with the Standard.

Guy Zito  
NPCC  
  
Pete  
Henderson  
  
IMO

Consideration: Agreed. Changed to "... for Reliability Standard 061.5-R51- items a) or 061.5-R51- b) ..."

**Comments about Section 6**

Standard                                      Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving      Consumers  
Applicability                                  Entity, Planning Authority and Resource Planner (Sections 3-8)

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

**Comments on Standard 061**

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18) std 061 Section 6 -R6-1:“...to NERC, the Regional Reliability Councils, and ...” shall be read instead of “...to NERC, the Regions, and ...” to be consistent with the Standard.

Guy Zito NPCC  
 Pete Henderson  
 IMO

Consideration: This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.

**Comments about Section 7**

Standard Applicability	Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)	Consumers
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Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

Section 7	R7-1	Replace "...Resource Planner shall be made known its amount..." with "...Resource Planner shall make known its amount..."	MAPP Planning Standards Subcommittee
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Consideration: Agreed.

7	R7-1	change "shall be made known" to "shall make known". Similar change required in Measures.	Raj Rana AEP
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Consideration: Agreed.

Section 7	M7-1	Reference to System Operators and Security Center Coordinators should be should be revised to address specific Functional Model entities.	FRCC
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Consideration: Agreed. Changed to Transmission Operator and Reliability Authority.

Section 7	Levels of Non Compliance	Reference to System Operators and Security Center Coordinators should be should be revised to address specific Functional Model entities.	FRCC
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**Comments on Standard 061**

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Consideration: Agreed. Changed to Transmission Operator and Reliability Authority.

19) std 061 Section 7 - Title, Level of Non Compliance: Level 1 & 4: "... data to Transmission Operator and Reliability Authority." shall be read instead of "... data to system operators and security center coordinators." to be consistent with NERC's Functional Model.

Guy Zito NPCC  
Pete Henderson  
IMO

Consideration: Agreed. Changed to Transmission Operator and Reliability Authority.

**Section 8**

Standard  
Applicability

Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)

Consumers

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

**Standard 062**

**Summary Consideration:** Based on Industry comments, this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on this standard.

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		This entire standard should not move forward in Version 0 since it is essentially already covered by STD 058. In addition it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Not well defined and/or detailed, needs further drafting for implementation	Bob Millard MAIN
3	M3-1	Change the last part of the measure to read: "in accordance with Reliability Standard 062-R3 and Reliability Standard 062-R2." in order to better match existing requirements.	Peter Mackin TANC
II.E	M1,M2,M3	Should be deleted from Version 0 because it shifts the burden from merely developing a representative model to developing detailed representations. In very specialized studies such information may be needed, but not on any regular basis.	SPP
II.E. Customer dynamic demand characteristics for reliability analysis.	II.E.M1, II.E.M2	The Planning Authority or RRCs should gather, review and utilize dynamic characteristics of customer demand for its reliability assessment - not develop the information. Transmission Planners or Load Serving entities are better suited to provide this information. These entities may chose to report "upward" to the Planning Authority. However, the other organizations would retain accountability for the information reported to the Planning Authority.	Bill Bojorquez ERCOT
		This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE Guy Zito NPCC
		20) std 062 Standard Applicability:  This standard is applicable to the Regional Reliability Councils which are not defined in the NERC's Functional Model.	Pete Henderson IMO Guy Zito NPCC

## Comments on Standard 062

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### Comments on Section 1

1		Should be applicable to the Planning Authorities and the transmission planner.	Raj Rana AEP
1	R1-1, R1-2	Transmission Planner should be added to Planning Authorities	William Smith Allegheny
1	M1-1, M1-2	Transmission Planner should be added to Planning Authorities	William Smith Allegheny

### Comments on Section 2

	2	Refers to NERC SDDWG. Does this group exist or merged within MMWG?	Ameren
2	R2-1	If the Std remains in the Version 0; Delete specific about "Hydro-Quebec Interconnection".  21) std 062 Section 2 - Applicability, R2-1: Why are Western and ERCOT Interconnections excluded?  22) std 062 Section 2 Level of Non Compliance: Level 3 "... demand characteristics were not provided on schedule ..." shall be read instead of "... demand characteristics were provided on schedule ..." .	Guy Zito NPCC Brandian ISO-NE  Pete Henderson IMO Guy Zito NPCC  Guy Zito NPCC Pete Henderson IMO

### Comments on Section 3

3	R3-1	If the Std remains in the Version 0; Delete specific about "Hydro-Quebec".	Guy Zito NPCC Brandian ISO-NE
3		Obligating LSEs to provide data for dynamic load modeling is unrealistic since this type of data is rarely available or realistically obtainable from the LSE.	Travis Bessier TXU

**Standard 063**

**Summary Consideration:**

The SDT made the following changes to Standard 063:

- Changed the title of section 063.3 to include the word, 'protection' to clarify that this standard is not addressing all transmission maintenance and testing, just transmission protection maintenance and testing
- Added 'Distribution Provider' to the list of entities that must comply with Section 3
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments or comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		Title should be clarified to add the word Protection (Change Transmission Maintenance and Testing” to Transmission PROTECTION Maintenance and Testing”) as this section includes protection maintenance	Paul Arnold BPA
		<b>Consideration: Agreed. This change has been implemented.</b>	
		We believe that the discussion section from the existing standard should remain. We also believe that the Introduction, Standards S1 and S2, and Measurements M1 and M2 from the existing standard III.A should be carried forward in the new standard. We do agree that the guides section should be eliminated, which contains many critical items that are included in the black-out recommendations including restricted use of zone 3 relays.	Ameren
		<b>Consideration: The discussion sections include valuable information – but the information is neither a requirement nor a measure, and doesn't belong in a Version 0 Standard. The discussion section should be translated into a 'supporting document' for Standard 063, and this is what the SDT is recommending to the Planning Committee.</b>	
		THIS HAS NOT BEEN FIELD TESTED PRIOR TO SUCH AN WIDE SCALE IMPLEMENTATION. ADDITIONALLY, LANGUAGE IS NEEDED IN THIS STANDARD THAT EXPLICITLY REQUIRES COMPARABLE TESTING REQUIRIEMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION	Mike Gildea Constellation

## Comments on Standard 063

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**Consideration:** This has gone through the entire standards development process (phase 2), including field testing, and will be included in Version 0.

The existing requirement as listed in S3 for III.A.M.3 requiring all “misoperations to be analyzed for cause and corrective operations” seems to have been deleted. The existing requirement only requires having a procedure. Please reintroduce S3.

Brandian ISO-NE  
Guy Zito NPCC

**Consideration:** Documentation of the misoperations and corrective operations is addressed completely in Section 2 of Standard 63.

Standards S1 and S2 from the Transmission Protection Systems section of the NERC Planning Standard (III.A.S1 and S2.) are not included in Version 0. These two standards drive the TO's to fund the appropriate level of system protection equipment and are the most important standards of this section. The standard as rewritten only requires misoperation reporting and maintenance (both of which are secondary to applying the correct protection).

Dave Angell  
WECC Relay WG

**Consideration:** Agreed – S1 and S2 are not in the set of existing Planning Standards and were not included in the set of documents to be included in this translation.

Looks like a reasonable summary for protection systems and it recognizes transmission, distribution, and generation.

PSE&G

**Consideration:** Agreed.

### Comments on Section 1

S1

Please add the word "all" before Transmission Protection system misoperations. Please identify that "Transmission Protection Systems" includes all equipment identified in the applicable FERC Transmission tariff.

Robert Snow

**Consideration:** Agreed, the word, 'all' was added. Adding the clarification requested is beyond the scope of the SDT.

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Exelon Corporation suggests that Standard 063 be moved quickly to Version 1 to require the Regions to have a procedure requiring the entities to have a process for the listed items. For example, the Region should require that the responsible entity determine a corrective action for the relay misoperation, but the Region should not specify the corrective action itself.

John Blazekovich  
Exelon

## Comments on Standard 063

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Consideration: Agreed, this is a good suggestion.

23) std 063 Sections 1 to 3: It is suggested that revised section on "Applicability" should include the term "Facility" eg transmission "facility" owner to capture the CWC and LDC facilities this applies to.

Guy Zito NPCC  
Pete Henderson  
IMO

Consideration: The applicability section will not be included in Version 0.

M1-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.

NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

### Comments on Section 2

2 On page 4, add "that own transmission protection system equipment" to the Section 2 Applicability box. It is stated later on in the Standard, but it may cause confusion if the first thing anyone sees is just a line saying this is applicable to Transmission Owners and Generator Owners. It is included in the Requirements box. What I am suggesting can be seen in Standard 69 in the Standard Applicability Box and it is less confusing.

Peter Mackin  
TANC

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

2 & 3 Suggest adding the words "that own transmission protection system equipment" to the Standard Applicability section for Sections 2 and 3. It is stated later on in the Standard (in the Requirements box of sections 2 and 3), but it may cause confusion on the first page if the first thing seen is the indication that it is applicable to Transmission Owners and Generator Owners. This would need to be done for the Applicability Section on sections 2 and 3. Also noted that the Applicability sections for 2 and 3 include Distribution Providers, but Distribution Providers are not identified on the first page with Transmission Owners and Generator Owners.

Steve Rueckert  
WECC

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new

**Comments on Standard 063**

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Reliability Standards and won't be included in the second draft of Version 0.

2	R2-1	This requirement is changed from IIIA in that the 30-day time frame is now from the event, not from a Region request. 30-days may be insufficient for analysis, field testing, and development of corrective actions following a misoperation, particularly if the misoperation is complex. While the intent of prompt remediation is laudable, the requirement does not allow sufficient time for the proper follow-up actions.	Consumers
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Consideration: The SDT could not locate where the language indicates 30 days from an event – the standard says 30 days of a request.

23) std 063 Sections 1 to 3:It is suggested that revised section on "Applicability" should include the term "Facility" eg transmission "facility" owner to capture the CWC and LDC facilities this applies to.	Guy Zito NPCC Pete Henderson IMO
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Consideration: The applicability section will not be included in the format for Version 0 standards.

2,3	R2, R3	There is inconsistency in the translation of Transmission Protection System Owner. Under Section 3, Transmission Owner and Generator Owner are used but under Section 2, Transmission Owner, Generator Owner and Distribution Provider are used. It is important to capture the protection systems of End-Use customers connected to the transmission system. Distribution Providers and Load-Serving Entities should be included in R2 and R3.	MAPP Planning Standards Subcommittee
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Consideration: LSEs don't 'own' equipment – so this wasn't added. DP was added to section 3 as suggested.

M2-1 – what kind of evidence?	Ed Davis Entergy
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Consideration: To be determined by the compliance monitor.

M2-1	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
M2-2	Eliminate "Distribution Provider" that owns a transmission protection system.	

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the

## Comments on Standard 063

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entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

Some Distribution Providers own transmission protection system equipment.

III.A	M4 & M5	Translation fails to capture correctly all protection system owners. It is possible to have a transmission substation owned by a customer. In such a case the transmission owner is not the owner of the transmission protection system and the incorrect translation increases the burden on the transmission owner by making the transmission owner responsible for equipment not owned	SPP
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Consideration: DP is already in Section 2 and was added to Section 3.

### Comments on Section 3

3	This section should not move forward in Version 0. More procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard	Bob Millard MAIN
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Consideration: There wasn't industry consensus on whether to try to eliminate all requirements that appeared redundant, so the SDT defaulted to retaining the requirements so it is easier for the industry to verify that all requirements were translated into Version 0.

3	On page 6, add "that own transmission protection system equipment" to the Section 3 Applicability box. It is stated later on in the Standard, but it may cause confusion if the first thing anyone sees is just a line saying this is applicable to Transmission Owners and Generator Owners. It is included in the Requirements box. What I am suggesting can be seen in Standard 69 in the Standard Applicability Box and it is less confusing.	Peter Mackin TANC
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Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

2 & 3	Suggest adding the words "that own transmission protection system equipment" to the Standard Applicability section for Sections 2 and 3. It is stated later on in the Standard (in the Requirements box of sections 2 and 3), but it may cause confusion on the first page if the first thing seen is the indication that it is applicable to Transmission Owners and Generator Owners. This would need to be done for the Applicability Section on sections 2 and 3. Also noted that the Applicability sections for 2 and 3 include Distribution Providers, but Distribution Providers	Steve Rueckert WECC
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**Comments on Standard 063**

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are not identified on the first page with Transmission Owners and Generator Owners.

Consideration: The 'Applicability' section was provided for convenience with the first draft of Version 0, but is not part of the format for new Reliability Standards and won't be included in the second draft of Version 0.

23) std 063 Sections 1 to 3: It is suggested that revised section on "Applicability" should include the term "Facility" eg transmission "facility" owner to capture the CWC and LDC facilities this applies to.

Guy Zito NPCC  
Pete Henderson  
IMO

Consideration: The applicability section will not be included in the format for Version 0 standards.

R3-1.a – should breakers and switches be included in the list?

Ed Davis Entergy

Consideration: Since these were not included in the original, including these is outside the scope of the SDT.

2,3 R2, R3 There is inconsistency in the translation of Transmission Protection System Owner. Under Section 3, Transmission Owner and Generator Owner are used but under Section 2, Transmission Owner, Generator Owner and Distribution Provider are used. It is important to capture the protection systems of End-Use customers connected to the transmission system. Distribution Providers and Load-Serving Entities should be included in R2 and R3.

MAPP Planning  
Standards  
Subcommittee

Consideration: LSEs don't 'own' equipment – so this wasn't added. DP was added to section 3 as suggested.

3 M3-1 has extra words in the Measures box. It appears the words "has a system" should be deleted.

Steve Rueckert  
WECC

Consideration: Agreed – the suggested change has been implemented.

M3-2 – what kind of evidence?

Ed Davis Entergy

Consideration: Evidence is addressed as part of the compliance administration – where this was somewhat vague in the source document, the SDT declined to make up new details.

M3-2            The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.            NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

III.A            M4 & M5            Translation fails to capture correctly all protection system owners. It is possible to have a transmission substation owned by a customer. In such a case the transmission owner is not the owner of the transmission protection system and the incorrect translation increases the burden on the transmission owner by making the transmission owner responsible for equipment not owned            SPP

Consideration: NERC is not in a position to enforce requirements assigned to customers. This needs to be addressed through an agreement.

**Standard 064**

**Summary Consideration:** Based on Industry comments, this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on this standard.

**General comments or comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		Reactive Capability curves? (See Std 59 R3-1)	Ed Davis Entergy
		THIS HAS NOT BEEN FIELD TESTED PRIOR TO SUCH AN WIDE SCALE IMPLEMENTATION. ADDITIONALLY, LANGUAGE IS NEEDED IN THIS STANDARD THAT EXPLICITLY REQUIRES COMPARABLE TESTING REQUIRIEMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION	Mike Gildea Constellation
		This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE Guy Zito NPCC
	Applicability	Needs to be expanded to include Load Serving Entities, to ensure that they have adequately planned for power factor correction in accordance with the Transmission Owner's published standard.	FRCC Bryan Guy Progress
Reactive Adequacy and Voltage Control		Concern: An organization can meet the requirements identified yet not come close to the depth and breadth of the study requirements mandated by FERC/DOE to First Energy following the blackout. A reactive adequacy study for major load centers should be part of this standard with a requirement that it be performed at least once every three years. There is just too great a dichotomy between the standard and the study required of First Energy.	Charles Matessa BG&E

**Comments on Section 1**

1	This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051. Not well defined and/or detailed, needs further drafting for	Bob Millard
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## Comments on Standard 064

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		implementation. Consideration should be given to incorporating this into STD 051 for added emphasis.	MAIN
1	R1-3	R1-3 is redundant, it does not contain any thing different that what is in R1-1.	MAPP Planning Standards Subcommittee
		24) std 064 Section 1 -Requirements (M1-4): Need to clarify whether 30 days or 30 business days.	Pete Henderson IMO Guy Zito NPCC
1		This Section appears to be unnecessary, since it is covered by Standard 051.	Travis Bessier TXU
S1		A considerable amount of rective power compensation must occur at the distribution level. There need to be a requirement on the LSE and DP to coordinate with the TP at the very lease. The existing language applied to the interface between transmission and distribution.	Robert Snow

## Comments on Section 2

2		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051. Not well defined and/or detailed, needs further drafting for implementation.	Bob Millard MAIN
2		It is not clear whether the coordination demonstration required by this Section must be on a generating unit basis or on a generation owner basis. In an electric market, with unbundled entities, the Transmission Operator can optimize reactive power use only to the degree allowed by the Generation Owner's unit and auxiliary equipment design.  Similarly, system reactive needs and optimization will depend upon uses of generation that are beyond the control of and the forecasting ability of the Transmission Operator.	Travis Bessier TXU

**Standard 065**

**Summary Consideration:** Based on Industry comments, this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on this standard.

**General comments or comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		Applicability: The Transmission Planning and Planning Authority functions should be added for the network voltage determination and studies required.	Paul Arnold BPA
		THIS HAS NOT BEEN FIELD TESTED PRIOR TO SUCH AN WIDE SCALE IMPLEMENTATION. ADDITIONALLY, LANGUAGE IS NEEDED IN THIS STANDARD THAT EXPLICITLY REQUIRES COMPARABLE TESTING REQUIREMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION	Mike Gildea Constellation
		This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE Guy Zito NPCC
		Standard 065 - III.C.M7 should be extensively revised because it is so vague. The NERC IDWG was unable to evaluate any Region using the October 2000 compliance template.	SPP

**Comments on Section 1**

1	R1-2	Providing information "upon request" sometimes means 5 business days or 30 business days. This abnormality should be consistent when using "upon request". The same issue occurs in other places within 065.	MAPP Planning Standards Subcommittee
1	R1-2	Whose procedures are being referenced here? R1-2 should begin as "The Transmission Operator's procedures".	MAPP Planning Standards Subcommittee
1	R1-3	Whose procedures are being referenced here? R1-2 should begin as "The Transmission Operator's procedures".	MAPP Planning Standards

## Comments on Standard 065

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Subcommittee

III.C	M1 & M7	The translation of levels of non-compliance errantly omits "synchronous" in the reference to procedures. There is a distinct difference between synchronous and asynchronous generators and "synchronous" must be included.	SPP
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### Comments on Section 2

2		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 065, Section 1.	Bob Millard MAIN
2	M2-1	The last part of the sentence (phrase "to be reviewed to verify compliance with this Reliability Standard") can be deleted.	MAPP Planning Standards Subcommittee

### Comments on Section 4

4		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 065, Section 3.	Bob Millard MAIN
4	4-1	The wording "within the reactive capability of the units" should be kept in R4-1. Also, the Levels of Non Compliance are too extreme. There should be some "grace" period prior to being at Level 1 and there should be larger ranges between each Level.	Consumers
		Measurement M4 from the existing standard, which requires generator owners to provide operating characteristics of generator's equipment and protective relays and controls, was not carried over to the new standard. We do not agree that the guides should be eliminated, as they contain many critical items that are explained as "good utility practice", which we have referenced in parallel operating agreements.	Ameren

### Comments on Section 5

5	M5-1	The term "Transmission Owner" should be "Transmission Operator" to align with R5-1 within 065.	MAPP Planning Standards Subcommittee
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**Comments on Standard 065**

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5	M5-2	The term "Transmission Owner" should be "Transmission Operator" to align with R5-1 within 065.	MAPP Planning Standards Subcommittee
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**Comments on Section 6**

6		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 065, Section 5.	Bob Millard MAIN
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6	6-1	It should be stated in M6-1 that documentation on tap settings, tap setting changes, available tap ranges and impedance data for auxiliary transformers should only be required if requested by the Transmission Operator. Many Transmission Operators are not modeling auxiliary transformers in loadflow or stability studies.	Consumers
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6	6-1	It should be stated in R6-1 that tap settings, available tap ranges and impedance data for auxiliary transformers should only be required if requested by the Transmission Operator. Many Transmission Operators are not modeling auxiliary transformers in loadflow or stability studies.	Consumers
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6	6-2	The following language should be added at the end of R6-2: "unless the Generator Owner can demonstrate that the requested tap change will put the generating unit at a risk level inconsistent with Good Utility Practice".	Consumers
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6	R6-2	<p>The range of available tap setting can be provided from nuclear stations, however the allowable range will be limited by NRC Degraded Grid design requirements.</p> <p>In addition, modifications to the taps at nuclear sites cannot be made until extensive power system analyses are performed. These analyses are required to assure the ability to mitigate an accident are reanalyzed to assure the recommended changes are appropriate. Once these analyses are done, a tap change can be implemented into the station modification process. This process is time consuming due to nuclear safety concerns associated with changing the plant auxiliary system voltage available under accident conditions. Any effort to bypass these programs would subject the plant to NRC scrutiny. This requirement should be rewritten recognizing these limitations.</p>	MAPP Planning Standards Subcommittee
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6	Levels of Non Compliance	Incorrect reference of Requirement IIIC.S2.Section C.R1. Needs to be updated to new Standard number	Bryan Guy Progress FRCC
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## Comments on Standard 065

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6	Levels of Non-Compliance	Level 1 of Non-compliance needs to have the reference changed to identify the correct Standard number within this Version 0 posting.	MAPP Planning Standards Subcommittee
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### Comments on Section 7

7		This section should not move forward in Version 0 since it is not well defined and/or detailed, needs further drafting for implementation and of value interconnection wide.	Bob Millard MAIN
7	R7-1	The use of the phrase "temporary excursions in voltage, frequency, and real and reactive power output" seems to lack a clear understanding of just how temporary and how large these excursions may be? More definitive language is necessary in determining the requirements for generators to stay connected to the transmission system.	MAPP Planning Standards Subcommittee
		Section 7 – how "Temporary"?	Ed Davis Energy
		Section 7 Levels of Non Compliance – Change "or" to "and" in the last line of Level 1	
III.C	M1 & M7	The translation of levels of non-compliance errantly omits "synchronous" in the reference to procedures. There is a distinct difference between synchronous and asynchronous generators and "synchronous" must be included.	SPP
7	III.C.M7	NERC IDWG assessed Regions' compliance to this Standard as part of 2001 Compliance Program. IDWG found this Measurement to be "vague and subject to varied interpretation." Therefore, IDWG did not assess Regions' compliance to this Measurement and recommended that this Standard be "revised to be more clear and objective." (Reference: IDWG Report Dated 10/31/01 to NERC Planning Standards Subcommittee.)	Raj Rana AEP

### Comments on Section 8

8		This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Not well defined and/or detailed.	Bob Millard MAIN
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**Comments on Standard 065**

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8	R8-1	This data is collected under the submittal of dynamics information in Standard 058, therefore the Version 0 NERC Drafting Team should consider combining this Requirement of Standard 065 to Standard 058. While the coordination function mentioned here is important, this measurement should be eliminated to reduce redundant reporting.	MAPP Planning Standards Subcommittee
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**Comments on Section 9**

9		This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Not well defined and/or detailed.	Bob Millard MAIN
9	R9-1	Compliance with the design requirements of this measurement as currently written could impact nuclear plant operating licenses and therefore requires additional evaluation that should be addressed within the industry. This measurement should be reviewed and revised as appropriate to ensure that NERC concerns are addressed, but the measurements be consistent with NRC regulations and nuclear safety.	MAPP Planning Standards Subcommittee
9	R9-1	There should be an exception added to cover older generating units with mechanical governors. Manufacturer specifications with regards to governor droop response percentages and dead band are almost non-existent for the older units.	MAPP Planning Standards Subcommittee
		Section 9 Requirements – should they be required to include graphs	Ed Davis Entergy
Section 9	Measures	How does this relate to the five-year test schedule of Standard 59? Is this new information?	FRCC
9	M9-1	Item (b) would read better as "That confirms the proper coordination of boiler or nuclear reactor control..".	MAPP Planning Standards Subcommittee
9	Levels of Non-Compliance	Level 1 of Non-compliance should be referring to Requirement R9-1 and not R1, as this may look like a reference to R1-1 or something other than what was intended.	MAPP Planning Standards Subcommittee

**Comments on Section 10**

## Comments on Standard 065

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10	R10-1	The Requirement should be revised to only require documentation and analysis of misoperations. "operations" seems like it should be replaced with "misoperations" since there doesn't seem to be much meaning in analyzing a proper operation?	MAPP Planning Standards Subcommittee
10	R10-2	The Requirement should be revised to only require documentation and analysis of misoperations. "operations" seems like it should be replaced with "misoperations" since there doesn't seem to be much meaning in analyzing a proper operation?	MAPP Planning Standards Subcommittee
10	M10-1	The Requirement should be revised to only require documentation and analysis of misoperations. "operations" seems like it should be replaced with "misoperations" since there doesn't seem to be much meaning in analyzing a proper operation?	MAPP Planning Standards Subcommittee
10	M10-2	The Requirement should be revised to only require documentation and analysis of misoperations. "operations" seems like it should be replaced with "misoperations" since there doesn't seem to be much meaning in analyzing a proper operation?	MAPP Planning Standards Subcommittee
10	Levels of Non-Compliance	Level 1 of Non-compliance should be referring to Requirement R9-1 and not R1, as this may look like a reference to R1-1 or something other than what was intended.	MAPP Planning Standards Subcommittee
10	Levels of Non-Compliance	The Levels of Non-compliance should use the word "Regional Reliability Council" versus the word "Regional" in order to fit into the NERC functional model.	MAPP Planning Standards Subcommittee

## Comments on Section 11

11		This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Not well defined and/or detailed.	Bob Millard MAIN
11	Applicability	The Applicability of Section 11 includes "Generator Owner" while the Requirements under Section 11 refer to "Generator Operators". This inconsistency should be fixed.	MAPP Planning Standards Subcommittee
		Section 11: Please make Applicability and Requirement R11-1 apply to the same entity, either the Generation Owner or the Generation Operator.	Ed Davis Entergy

## Comments on Standard 065

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Section 11	R11-1	Incorrect reference of Requirement III.C.S6.Section A.R1. Needs to be updated to new Standard number	FRCC Bryan Guy Progress
		R11-1 (a) Change reference to some part of these Standards.	Ed Davis Entergy
11	R11-1	The Requirement should be revised to only require documentation and analysis of misoperations. "operations" seems like it should be replaced with "misoperations" since there doesn't seem to be much meaning in analyzing a proper operation?	MAPP Planning Standards Subcommittee
11	R11-1	R11-1 (a) includes a reference to an old NERC template. This reference should be replaced with a relevant reference within the Version 0 posting.	MAPP Planning Standards Subcommittee
11	R11-2	The phrase "of all misoperations" should be added after "corrective actions" to clarify what documentation is needed by the Generator Operators.	MAPP Planning Standards Subcommittee
11	M11-1	M11-1 contains a reference to standard 069 instead of 065 of which this Measure is a part of.	MAPP Planning Standards Subcommittee
11	M11-1	Should reference 065-R11-1 not 069	Dave Angell WECC Relay WG
11	M11-2	Should reference 065-R11-1 not 069	Dave Angell WECC Relay WG
11	M11-2	M11-2 contains a reference to standard 069 instead of 065 of which this Measure is a part of.	MAPP Planning Standards Subcommittee

## Comments on Section 12

**Comments on Standard 065**

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12	R12-1	<p>The language for protection system maintenance and testing programs should be consistent from standard to standard. The requirement in this standard should match Standard 063, Requirement R3-1. This will provide a consistent reporting requirement for all protection system.</p>	<p>Dave Angell WECC Relay WG</p>
Section 12	M12-1 & M12-2	<p>Specific test requirements should be included in this standard that enumerates protection systems to be tested such as; Exciter ground detection system, Vibration probes, Thermocouples.</p> <p>In addition, guidelines to determine if non-conventional generating units that may have plant protection systems that aren't turbine or generator protection systems are included in this standard.</p>	<p>FRCC</p>
12	M12-2	<p>M12-2 seems to have forgotten to mention "who" the generator protection system maintenance and testing program and its implementation needs to be provided to. It was stated within R12-2.</p>	<p>MAPP Planning Standards Subcommittee</p>
12		<p>As written, Section 12 is applicable to Generator Operator. This section should be applicable to the Generator Owner instead. This section deals with having a generator protection system maintenance and testing program in place. Equipment maintenance is the responsibility of the Generator Owner and not the Generator Operator. In the Functional Model, one of the tasks for Generator Ownership is:</p> <p>“Maintain its generation facilities according to prudent utility practices” (Page 38, Functional Model, Version 2)</p> <p>While one of the tasks for Generator Operation is:</p> <p>“Develop annual maintenance plan for generating units and performs the day-to-day generator maintenance” (Page 36, Functional Model, Version 2)</p> <p>this task seems to pertain to the operations of the generator, for example, scheduling when to take the generating unit out of service for maintenance, and not developing a plan for performing maintaining and testing of the specific pieces of equipment such as relay protection systems.</p>	<p>Peter Mackin TANC</p>

**Standard 066**

**Summary Consideration:** Based on Industry comments, this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on this standard.

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		This entire standard should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051. Not well defined and/or detailed, needs further drafting for implementation. Consideration should be given to incorporating this into STD 051 for added emphasis.	Bob Millard MAIN
		Applicability: The Transmission Planning and Planning Authority functions should be added to periodic review of settings of control devices since part of this section pertains to studies to be performed.	Paul Arnold BPA
	General Comments	We are not sure if the modeling of relays in stability studies in addition to the traditional coordination of relays in a five-year cycle is a reasonable expectation.	FRCC
		This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE Guy Zito NPCC
Standard Applicability		Listed as "Transmission Owners". Yet Applicability varies by section. Add "Planning Authority", "Transmission Planner", "Regional Reliability Council", and "Transmission Operator".	MAPP Planning Standards Subcommittee

**Comments on Purpose**

In the Purpose, we suggest adding the word "are" to the first sentence. The revised Purpose would read: "To ensure that Transmission Control devices are reliability coordinated..."

Peter Mackin  
TANC

25) std 066 Section - Purpose:

The terminology of "Region" should be replaced with "Regional Reliability Council" to be consistent with terminology mapping followed in other such related version 0 standards.

Pete Henderson  
IMO  
Guy Zito  
NPCC

**Comments on Standard 066**

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**Comments on Section 1**

Section 1	R1-1	Revise who is responsible. The requirement indicates Transmission Owner while the Applicability Section says the Planning Authority and the Transmission Planner. Maybe all three apply. Revise the Requirement and the Applicability section to be consistent.	MAPP Planning Standards Subcommittee
		Section 1 - Applicability should include Transmission Owners	Ed Davis
		Reference to Regions in R1-2, and for Compliance Monitoring	Entergy
		Compliance Monitor should be included for monitoring the compliance	
		Compliance Monitoring "On Request" within 30 days not addressed in the Standard which was included in the original Planning Standard.	Ed Davis Entergy

**Comments on Section 3**

Section 3	Applicability and Measures	The requirement indicates that the Transmission Owner and Transmission Operator are responsible. Yet the Applicability Section and Measures indicates only Transmission Owners. Add Transmission Operator to Applicability and Measures.	MAPP Planning Standards Subcommittee
		Section 3 - Applicability should include Transmission Operator	Ed Davis Entergy

**Standard 067**

**Summary Consideration:**

The SDT made the following changes to Standard 067:

- Abbreviated the Purpose
- Subdivided R2-1 because it contained two requirements
- Added measures M2-1, M2-2 that were erroneously omitted from the first draft of Version 0
- Removed the LSE from the list of entities responsible for requirements in Sections 2-4
- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard.	Bob Millard MAIN
		<b>Consideration: The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.</b>	
		The standard and measures were reworded and regrouped unnecessarily. We do not agree that the guides should be left out of the new standard.	Ameren
		<b>Consideration: The SDT agrees that the Planning Guides are an extremely valuable resource and should not be discarded. The SDT will recommend that the NERC Planning Committee convert these guidelines into Technical References that link to each of the associated standards. Making this conversion is outside the scope of this SDT.</b>	
		Applicability section refers to Regional Reliability Councils which are not in the Functional Model. In stead it should refer to Reliability Authority.	Ed Davis Entergy
		<b>Consideration: This phrase was changed throughout Version 0 to 'Regional Reliability Organization'.</b>	
		Compliance Monitoring Process should include that the data to be provided to Compliance Monitor – it is not clear who and to whom the data will be provided (within 30 days) on request. This is applicable to all sections.	Ed Davis Entergy
		<b>Consideration: Agreed, however the SDT's assignment was to make a clean translation of existing documents – where those documents lacked specificity, the associated Version 0 documents will also lack specificity. Adding more details is beyond the scope of the SDT and needs to be</b>	

**Comments on Standard 068**

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addressed in Version 1.

Standard Applicability and Sections 2-4	The applicability of these sections has expanded to Load Serving Entity and Distribution Provider. This standard should only be applicable to Transmission Operators and/or Transmission Owners since they are responsible for matching generation and load.	Consumers
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Consideration: The LSE has been removed from these sections since it doesn't own the equipment being referenced. The DP was retained because it does own the equipment being referenced in accordance with the Functional Model.

The original standard III.D. also included Guides. These should be carried over into Version 0.F	MAPP Planning Standards Subcommittee
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Consideration: The SDT agrees that the Planning Guides are an extremely valuable resource and should not be discarded. The SDT will recommend that the NERC Planning Committee convert these guidelines into Technical References that link to each of the associated standards. Making this conversion is outside the scope of this SDT.

**Comments on Purpose**

Purpose	Provide last resort system preservation measures by implementing an Under Frequency Load Shedding (underfrequency load shedding) Program requiring end users of electricity on the bulk electric system to drop loads to arrest declining system frequency during capacity shortages resulting from system islanding or other major system disturbances.	Gerald Reahl Manitoba
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Consideration: The purpose was abbreviated to remove all unnecessary language.

Purpose statement does not have to refer to system islanding or other system disturbances – load shedding to arrest declining system frequency during capacity shortage is enough regardless of what caused it.	Ed Davis Entergy
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Consideration: The purpose statement was abbreviated in support of your suggestion.

Disagree with the term “end users of electricity” as being the entity that drops load, during an underfrequency event it's the service to that customer that gets interrupted, it's not the customer that drops the load.	Gerald Reahl Manitoba
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Consideration: The reference to end users was deleted.

**Comments on Section 1**

1	R1-1	List item 4 refers to "Regional". Change to "Regional Reliability Council" to match rest of document.	MAPP Planning Standards Subcommittee
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Consideration: 'Region' was changed to 'Regional Reliability Organization' throughout Version 0.

26) std 067 Section 1 -Requirements (R1-2, R1-3): Need to clarify whether 30 days or 30 business days.	Pete Henderson IMO
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Consideration: Throughout Version 0 Planning Standards references to '30' days were all changed to state, '30 calendar days'.

M1-2 M1-3	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
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Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Comments on Section 2**

Section 2 should refer to coordination of under frequency load shedding programs with those of Reliability Authority.	Ed Davis Entergy
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Consideration: The measures from the source document's section 2, do not require coordination of UFLS programs with the RA. The first section of Standard 067, and its associated source document, both include this requirement.

2	R2-1	Replace "RRC" with "Regional Reliability Council" to be consistent with rest of document.	MAPP Planning Standards Subcommittee
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Consideration: RRC was changed throughout Version 0 to 'Regional Reliability Organization'.

**Comments on Standard 068**

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2	Exelon Corporation suggests that Standard 067 be moved quickly to Version 1 in order to clarify levels of non-compliance. As written it appears that an entity is in compliance if it has any value greater than 95% of the regional requirements in any of the load steps.	John Blazekovich Exelon
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**Consideration: Agreed.**

27) std 067 Section 2 -Requirements (R2-2):Need to clarify whether 30 days or 30 business days.	Guy Zito NPCC Pete Henderson IMO
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**Consideration: Consideration: Throughout Version 0 Planning Standards references to '30' days were all changed to state, '30 calendar days'.**

28) std 067 Section 2 -Measure:No measures specified.	Guy Zito NPCC Pete Henderson IMO
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**Consideration: Agreed – this was not intentional and the measures have been added.**

29) std 067 Section 2 -Compliance Monitoring Process:Need to clarify whether 30 days or 30 business days.	Guy Zito NPCC Pete Henderson IMO
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**Consideration: This was changed to 30 'calendar' days for all Version 0 Planning Standards whose source document indicated '30 days'.**

Standard Applicability and Sections 2-4	The applicability of these sections has expanded to Load Serving Entity and Distribution Provider. This standard should only be applicable to Transmission Operators and/or Transmission Owners since they are responsible for matching generation and load.	Consumers
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**Consideration: The LSE has been removed from these sections since it doesn't own the equipment being referenced. The DP was retained because it does own the equipment being referenced in accordance with the Functional Model.**



## Comments on Standard 068

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provide the document already exists.

### Comments on Section 4

31) std 067 Section 4 -Requirements (R4-2):Compliance Monitoring Process: Need to clarify whether 90 days refers to 90 business days. Guy Zito NPCC  
Pete Henderson  
IMO

Consideration: This was changed to 90 'calendar' days for consistency with other Version 0 Planning Standards.

Standard Applicability and Sections 2-4 The applicability of these sections has expanded to Load Serving Entity and Distribution Provider. This standard should only be applicable to Transmission Operators and/or Transmission Owners since they are responsible for matching generation and load. Consumers

Consideration: The LSE has been removed from these sections since it doesn't own the equipment being referenced. The DP was retained because it does own the equipment being referenced in accordance with the Functional Model.

Section 4 Compliance Monitoring Process requires analysis to be provided on request 90 days after the system event – it is consistent with the original standards but needs clarification. Is it on request, or mandatory to provide the data within 90 days after the event? Since this standard requires analysis and documentation of under frequency load shedding performance to be done, we suggest that the data should be provided to the Compliance monitor within 90 days of the event. Ed Davis  
Entergy

Consideration: Adding more information is outside the scope of the SDT and should be addressed in Version 1.

M4-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Standard 068**

**Summary Consideration:** Based on Industry comments, Sections 1, 2 and 5 will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on these sections of this standard.

The SDT made the following changes to Standard 068:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments and comments on entire standard:**

Section	Requirement or Measure	Comment	Commenter
		The standard and measures were reworded and regrouped unnecessarily. We do not agree that the guides should be left out of the new standard.	Ameren
		<b>Consideration:</b> The SDT agrees that the Planning Guides are an extremely valuable resource and should not be discarded. The SDT will recommend that the NERC Planning Committee convert these guidelines into Technical References that link to each of the associated standards. Making this conversion is outside the scope of this SDT.	
		Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council.	Ed Davis Entergy
		<b>Consideration: Agreed</b>	
		Applicability should refer to Reliability Authority rather than Regional Reliability Council in all sections of this standard.	Ed Davis Entergy
		<b>Consideration: Only Sections 3 and 4 will be included in Version 0, and these sections don't have requirements assigned to the RRC.</b>	
Standard Applicability and Sections 1, 2 and 4		The purpose of a UVLS program is to prevent a voltage collapse or voltage instability on the transmission system. Therefore, this standard should not be applicable to Load Serving Entities and Distribution Providers.	Consumers
		<b>Consideration: Under the Functional Model, (page 42) the LSE identifies and provides facilities for load curtailment. Under the Functional</b>	

## Comments on Standard 068

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Model, the DP implements Voltage Reduction and sheds load as directed by the TOP.

General Comments At the present time there are very few Regional under-voltage load shedding programs. It appears that until these programs are deemed necessary or the reliability of the Interconnected Systems this standard should not be adopted. FRCC

Consideration: Sections 3 and 4 of this standard have been through the entire standards development process and have been implemented in the industry and will be included in Version 0. The other sections of this standard have been removed from Version 0 based on industry comments.

This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0 Brandian ISO-NE  
Guy Zito NPCC

Consideration: Sections 3 and 4 of this standard have been through the entire standards development process and have been implemented in the industry and will be included in Version 0. The other sections of this standard have been removed from Version 0 based on industry comments.

III.E M1,M2,M5 The approval dates for M1, M2, and M5 are in error. "October 9, 2000" is the correct date. SPP

Consideration: Agreed – but these sections will be removed from Version 0 based on industry comments.

1, 3-5 R1, R3-R5 Approval dates of M1, M2, and M5 are October 9, 2000 not 2004. MAPP Planning Standards Subcommittee

Consideration: Agreed – but these sections will be removed from Version 0 based on industry comments.

The language from the existing document under sections S1 and S2 (on P 2/13) should be added to the proposed standard (coordinating with neighbors and coordinating with generation). Frank McElvain  
Tri-State G&T

Consideration: Sections one and two have been removed from Version 0.

## Comments on Purpose

**Comments on Standard 068**

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Change wording around in Purpose to read “Provide System preservation measures by implementing an Undervoltage Load Shedding program requiring end users of electricity on the bulk electric system to drop load in an attempt to prevent system voltage collapse or voltage instability.”

Frank McElvain  
Tri-State G&T

Consideration: Most entities accepted the original purpose statement, and your suggested revision didn't highlight an inconsistency or correction, so the original language was retained.

Purpose should refer to system reliability rather than preservation, or preservation of system reliability.

Ed Davis Entergy

Consideration: Most entities accepted the original purpose statement, and your suggested revision didn't highlight an inconsistency or correction, so the original language was retained.

**Comments on Section 1 – This section was removed from Version 0 based on industry comments.**

Applicability should refer to Reliability Authority rather than Regional Reliability Council in all sections of this standard.

Ed Davis Entergy

In the general Standard Applicability area, Sections 1, 3, and 4 should read “The Responsible Entity may be any and/or all of the following: Load-serving Entity, Transmission Owner, Transmission Operator and Distribution Provider that owns or operates an under voltage load shedding system.” Have this be the wording for the Applicability part of those Sections. Replace the explanation of who a section applies to with The Responsible Entity in the Requirements and Measures parts of these Sections.

Frank McElvain  
Tri-State G&T

Standard Applicability and Sections 1, 2 and 4

The purpose of a UVLS program is to prevent a voltage collapse or voltage instability on the transmission system. Therefore, this standard should not be applicable to Load Serving Entities and Distribution Providers.

Consumers

1 1 Change to read, “automatic load resotation (see Standard RS 071)”.

Frank McElvain  
Tri-State G&T

**Comments on Standard 068**

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1	2	Should read "...and NERC within five business days of a request." to be consistent.	Frank McElvain Tri-State G&T
	M1-2	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
1	M2	should read "...evidence it provided the documentation in the form of a return mail receipt from NERC in accordance with R1-2." The actual form of the evidence needs to be determined. This comment proposes a mail receipt as a place holder.	Frank McElvain Tri-State G&T
		Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council.	Ed Davis Entergy

**Comments on Section 2 – This section was removed from Version 0 based on industry comments**

2		This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard.	Bob Millard MAIN
		Applicability should refer to Reliability Authority rather than Regional Reliability Council in all sections of this standard.	Ed Davis Entergy
Standard Applicability and Sections 1, 2 and 4		The purpose of a UVLS program is to prevent a voltage collapse or voltage instability on the transmission system. Therefore, this standard should not be applicable to Load Serving Entities and Distribution Providers.	Consumers
2	1	Start with "Each" instead of "The".	Frank McElvain Tri-State G&T
2	R2	Not sure if all Regional Reliability Councils are able to produce a database of UVLS programs immediately. There should be a transition period to allow creation of a database if this standard is kept in Version 0.	MAPP Planning Standards Subcommittee

## Comments on Standard 068

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2	2	This requirement is redundant, and should be changed to read, "Each Regional Reliability Council shall provide its current database to NERC within five (or ten) business days of a request."	Frank McElvain Tri-State G&T
2		Measures are not labeled with M1 and M2. The second measure should delete "to NERC".	Frank McElvain Tri-State G&T
		Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council.	Ed Davis Entergy

## Comments on Section 3

3		The title is too long, effectiveness implies adequate design. Therefore, change the title to "Technical Assessment of the Effectiveness of Undervoltage Load Shedding Measures".	Frank McElvain Tri-State G&T
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Consideration: This is a direct translation of the brief description.

Applicability: The Transmission Planning and Planning Authority functions should be added to UVLS Program since part of this section has requirements for technical assessment of program (ie studies).

Paul Arnold  
BPA

Consideration: The SDT added the following sentence to include the Transmission Planner and Planning Authority into this requirement. "This assessment shall be conducted with the associated Transmission Planner(s) and Planning Authority(ies)."

In the general Standard Applicability area, Sections 1, 3, and 4 should read "The Responsible Entity may be any and/or all of the following: Load-serving Entity, Transmission Owner, Transmission Operator and Distribution Provider that owns or operates an under voltage load shedding system." Have this be the wording for the Applicability part of those Sections. Replace the explanation of who a section applies to with The Responsible Entity in the Requirements and Measures parts of these Sections.

Frank McElvain  
Tri-State G&T

Consideration: The Applicability section will not be included in the next draft of Version 0.

3	1	Throughout the standard, Undervoltage Load Shedding should be used consistently instead of UVLS, or a parenthetical should be defined once and used for the rest of the standard.	Frank McElvain
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Tri-State G&T

Consideration: Agreed. The revised standard should not include any acronyms.

3 1 Should read "...shall include in its technical assessment the elements identified..."

Frank McElvain  
Tri-State G&T

Consideration: The SDT declined to use this suggestion since it doesn't correct anything.

3 2 Should read "...and NERC within 30 business days of a request." to be consistent. (Also recommend that 30 business days be reduced to 5 or 10 business days).

Frank McElvain  
Tri-State G&T

Consideration: This was changed to 30 calendar days to be consistent with the other sections of Version 0.

M3-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.

NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

The Measure referred to by noncompliance level 4 in section 3 may not be correct. We believe it should refer to Standard 068-R3 (not 068-R2).

Peter Mackin  
TANC

Consideration: Agreed. This has been corrected.

3 Section 3: The Level 4 compliance requirements should have "the technical assessment provided but not complete language" moved to Level 1.

MAPP Planning  
Standards  
Subcommittee

Consideration: This would be a change from the existing levels of non-compliance and is beyond the scope of the SDT.

## Comments on Standard 068

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Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council. Ed Davis Entergy

Consideration: Agreed.

### Comments on Section 4

Standard Applicability and Sections 1, 2 and 4 The purpose of a UVLS program is to prevent a voltage collapse or voltage instability on the transmission system. Therefore, this standard should not be applicable to Load Serving Entities and Distribution Providers. Consumers

Consideration: Under the Functional Model, (page 42) the LSE identifies and provides facilities for load curtailment. Under the Functional Model, the DP implements Voltage Reduction and sheds load as directed by the TOP.

4 1-a Change to read, "Under voltage load shedding system identification which shall include..." Frank McElvain  
Tri-State G&T

Consideration: The 'which' was added as suggested.

4 2 Should read "...and NERC within 30 business days of a request." to be consistent. Also reduce 30 business days to 5 or 10. Frank McElvain  
Tri-State G&T

Consideration: This was changed to 30 calendar days to be consistent with other Version 0 standards.

M4-2 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council. Ed Davis Entergy

Consideration: Agreed

**Comments on Section 5 – This section was removed from Version 0 based on industry comments.**

5 This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Bob Millard MAIN

Applicability should refer to Reliability Authority rather than Regional Reliability Council in all sections of this standard. Ed Davis Entergy

In the general Standard Applicability area, Sections 1, 3, and 4 should read “The Responsible Entity may be any and/or all of the following: Load-serving Entity, Transmission Owner, Transmission Operator and Distribution Provider that owns or operates an under voltage load shedding system.” Have this be the wording for the Applicability part of those Sections. Replace the explanation of who a section applies to with The Responsible Entity in the Requirements and Measures parts of these Sections. Frank McElvain Tri-State G&T

The Transmission Operator reference is not translated accurately. Section 1: Applicability - Trans. Operator missing, Section 4: remove reference to Transmission Operator, Section 5, add Transmission Operator in R5-1, R5-2 MAPP Planning Standards Subcommittee

5 1 Should include language to clarify that the analysis is of the actual performance with spelled out items to include in that performance evaluation, such as causes for misoperations or failures to operate and their corrective actions, the date of implementation of those actions, etc. Frank McElvain Tri-State G&T

5 2 Replace “of undervoltage load shedding operations, misoperations, and failures to operate” with “as specified in R5-1” to be consistent. Frank McElvain Tri-State G&T

5 2 Delete “undervoltage load shedding operations, misoperations, and failures to operate” to be Frank McElvain

**Comments on Standard 068**

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		consistent.	Tri-State G&T
5	2	Should read "...and NERC within 30 business days of a request." to be consistent. Also reduce 30 business days to 5 or 10.	Frank McElvain Tri-State G&T
5	M1	Change to read, "...and failures to operate conforms to the requirements specified in 069-R5-1".	Frank McElvain Tri-State G&T
	M5-2	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
		Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council.	Ed Davis Entergy

**Standard 069**

**Summary Consideration:**

The SDT made the following changes to Standard 069:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

Section	Requirement or Measure	Comment	Commenter
		The existing document has an introduction section which essentially defines what is and what is not an SPS or RAS. This has been removed from the standard and it is suggested by the editors that it be moved to some other technical guide. In most ANSI standards that I am familiar with there is a section of the document devoted to definitions. This introduction paragraph would make a good definition of a SPS or RAS	Paul Arnold BPA
		<p>Consideration: The definitions and other explanatory information need to be moved into 'supporting documents.' Although some ANSI standards do include definitions, this isn't a requirement for ANSI Accreditation of a standards development process. NERC's Standards Process Manual indicates that definitions (and other reference materials) will be contained in supporting documents, not in the body of standards.</p>	
		The standard and measures were reworded and regrouped unnecessarily. We do not agree that the guides should be left out of the new standard.	Ameren
		<p>Consideration: The discussion sections include valuable information – but the information is neither a requirement nor a measure, and doesn't belong in a Version 0 Standard. The discussion section should be translated into a 'supporting document' for Standard 063, and this is what the SDT is recommending to the Planning Committee.</p>	
		Standard Applicability should refer to Reliability Authority rather than Regional Reliability Councils.	Ed Davis Entergy
		<p>Consideration: This section won't be included in the next version of the draft.</p>	
	Effective Dates	The dates for approval of the existing standards appear to be incorrect.	FRCC
		<p>Consideration: This section won't be included in the next version of the draft.</p>	

## Comments on Standard 069

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III.F Under the heading it refers to the correct templates, but under Existing Document Language for Approvals the references are all to III.A templates. SPP

Consideration: Agreed – this was a typographical error.

### Comments on Purpose

Purpose The definition of an SPS/RAS should be included in the purpose statement. the 'old' Planning Standards contained a definition in the Introduction Section. All Standards should be self contained. Raj Rana  
AEP

Consideration: Definitions will be included in a single glossary for all Reliability Standards – they won't be included in individual standards.

### Comments on Section 1

1 Applicability: The Transmission Planning and Planning Authority functions should be added to SPS since part of this section has requirements for technical assessment of inadvertent operation of and coordination with other SPS. Paul Arnold  
BPA

Consideration: The type of analysis being conducted in this requirement can be done by an outside contractor or other entity – not necessarily the TP or PA.

Requirements of Section 1 should refer to Reliability Authority rather than Regional Reliability Councils. Ed Davis Entergy

Consideration: The SDT declined to make this change because this would change the intent of the requirement. Note that RRC was changed to RRO throughout Version 0 for consistency.

1 R1-1 Item 3) The sentence should finish "... meeting the performance requirements defined in sections 1,2 and 3 of the Standard 051." Consumers

Consideration: Agreed – the change has been made.

1 On page 4, 3) has what appears to be erroneous wording at the very end of the statement. It has the following "requirements defined in sections 1,2,3, and 3 of Standard 051. From the old template I believe this should say sections 1, 2, and 3.... Peter Mackin  
TANC

**Comments on Standard 069**

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**Consideration: Agreed – this has been corrected.**

1 R1-1 3) Last line says "1, 2, 3 and 3 of . . ." should say "1, 2, 3, and 4 of . . ." MAPP Planning Standards Subcommittee

**Consideration: Agreed – the change has been made.**

1 R1-1 Sub-bullet 3, near the end reads, "requirements defined in sections 1,2,3,and 3 of Standard 51. When compared to the old III.F.M1 template it would apper this should read 1, 2 and 3 of Standard 51." Steve Rueckert WECC

**Consideration: Agreed – this change has been made.**

1 M1-1 Believe Reliability Standard # should be 064R1-1. MAPP Planning Standards Subcommittee

**Consideration: This was changed to 069R1-1. We think this is what you intended.**

1, 2, 4, 5, 6 R2-1, M2-1, R4-1, R4-2, R4-3, M4-1, M4-2, M4-3, R5-1, R5-2, R5-3, M5-1, M5-2, M5-3, R6-1, R6-2, M6-1, M6-2 Consumers

**Consideration: Load shedding included as part of a SPS could involve the Distribution Provider's facilities.**

Section 1 measures should refer to Transmission Owners, Transmission Operators, Generator Owners, and Distribution Operators rather than members of Regional Reliability Ed Davis Entergy

Councils.

Consideration: Section 1 has been changed as you've suggested.

M1-2            The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.            NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Comments on Section 2**

2                            This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard.                            Bob Millard MAIN

Consideration: The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

1, 2, 4, 5, 6    R2-1, M2-1, R4-1, R4-2, R4-3, M4-1, M4-2, M4-3, R5-1, R5-2, R5-3, M5-1, M5-2, M5-3, R6-1, R6-2, M6-1, M6-2            Strike reference to 'Distribution Provider(s)'. SPS's apply to transmission systems. Standard 051 is Transmission System Adequacy and Security, not Distribution System Adequacy and Security. The existing standard does not mention Distribution Provider(s).            Consumers

Consideration: Load shedding included as part of a SPS could involve the Distribution Provider's facilities.

2                            M2-1            At the end say " . . . as defined in section 2 R2 of the Reliability Standard." instead of " . . .            MAPP Planning

. section 2 R1 . . ."

Standards  
Subcommittee

Consideration: This change has been adopted and is reflected in the revised standard.

M2-2

The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.

NIPSCO

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Comments on Section 3**

3

This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051.

Bob Millard MAIN

Consideration: The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

Section 3 refers to Regional Reliability Council for assessing the operation, coordination, and effectiveness of all Special Protection System. Reliability Authority or other entities included in the Functional Model should have this responsibility.

Ed Davis Entergy

Consideration: This would change the intent of this standard, and the change wasn't adopted for Version 0. This should be addressed in Version 1.

III.F

III.F.M3

Special  
Protection  
System  
Assessment

The Transmission Planner or Operator, not the Regional Reliability Council, should perform the assessments of the operation, coordination, and effectiveness of Special Protection System installed in their service territory. The RRC could gather, review, and summarize such assessments.

Bill Bojorquez  
ERCOT

Consideration: This would change the intent of this standard, and the change wasn't adopted for Version 0. This should be addressed in Version 1.

**Comments on Standard 069**

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3 Level 1 in the Levels of noncompliance is missing the 1. It just says Level Steve Rueckert  
WECC

**Consideration:** This was a typo and has been corrected.

3 Under levels of noncompliance Level 1 is missing the 1, it only says Level Peter Mackin  
TANC

**Consideration:** Agreed – this typo has been corrected.

**Comments on Section 4**

4 This section should not move forward in Version 0 since it is essentially already covered Bob Millard MAIN  
by Version 0 STD 051.

**Consideration:** The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

1, 2, 4, 5, 6 R2-1, M2-1, R4-1, R4-2, R4-3, M4-1, M4-2, M4-3, R5-1, R5-2, R5-3, M5-1, M5-2, M5-3, R6-1, R6-2, M6-1, M6-2 Strike reference to 'Distribution Provider(s)'. SPS's apply to transmission systems. Standard 051 is Transmission System Adequacy and Security, not Distribution System Adequacy and Security. The existing standard does not mention Distribution Provider(s). Consumers

**Consideration:** Load shedding included as part of a SPS could involve the Distribution Provider's facilities.

4 R-4 Page 1 of standard says definitions will be removed and put into a "technical guide". However, Page 13 R4-1 refers to definitions in this document. Correction: Definitions MAPP Planning Standards

**Comments on Standard 069**

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should be retained in the standard.

Subcommittee

Consideration: The word, 'specified' was used in place of 'defined' to clarify what was intended. This was not meant to refer to a 'definition.'

4 and 6	M4-1; M4-2; M4-3; M4-4; M6-1; M6-2	Wording for the Requirements are exact duplicates of the measures. Suggest measures says something like "have documentation of", or "have evidence of" similar to other measures.	MAPP Planning Standards Subcommittee
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Consideration: M4-1 was modified to include the suggested language and this seemed to be the only place where a reference to something documented or demonstrable that could be measured.

M4-3	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
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Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

4	I believe the Levels 1 and 2 of noncompliance should read Special Protection System Owners.. Also think that the word "requirements" should be added to the end of the description of level 1.	Steve Rueckert WECC
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Consideration: Agreed – these changes were made.

4	We believe that the wording for Levels 1 and 2 should start out Special Protection System Owners.... Also it looks like the word "requirements" should be on the very end of the definition of Level 1.	Peter Mackin TANC
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Consideration: Agreed – these typos have been corrected.

**Comments on Section 5**

5	This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard.	Bob Millard MAIN
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**Comments on Standard 069**

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**Consideration:** The SDT was charged with translating all existing standards – deleting a section of a standard without industry consensus is outside the scope of the SDT. This should be addressed with Version 1.

1, 2, 4, 5, 6	R2-1, M2-1, R4-1, R4-2, R4-3, M4-1, M4-2, M4-3, R5-1, R5-2, R5-3, M5-1, M5-2, M5-3, R6-1, R6-2, M6-1, M6-2	Strike reference to 'Distribution Provider(s)'. SPS's apply to transmission systems. Standard 051 is Transmission System Adequacy and Security, not Distribution System Adequacy and Security. The existing standard does not mention Distribution Provider(s).	Consumers
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**Consideration:** Load shedding included as part of a SPS could involve the Distribution Provider's facilities.

5	R5-1	Change 3rd line to " . . . shall analyse it's Special Protection System misoperations in accordance with . . . ".	MAPP Planning Standards Subcommittee
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**Consideration:** The existing language was an accurate and complete translation and wasn't changed to conform with your suggestion.

5	2	Exelon Corporation suggests that Standard 069 be moved quickly to Version 1 in order to re-write R5-2 to state that that a TO, GO or DP need only have evidence that action was taken to avoid misoperations after having had one. Further we feel that SPS requires a more clear definition of what types of protection system fall into the "SPS" (e.g. automatic load throwover systems).	John Blazekovich Exelon
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**Consideration:** Agreed – these are good areas for further development in Version 1.

M5-3	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
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**Consideration:** The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the

entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Comments on Section 6**

1, 2, 4, 5, 6	R2-1, M2-1, R4-1, R4-2, R4-3, M4-1, M4-2, M4-3, R5-1, R5-2, R5-3, M5-1, M5-2, M5-3, R6-1, R6-2, M6-1, M6-2	Strike reference to 'Distribution Provider(s)'. SPS's apply to transmission systems. Standard 051 is Transmission System Adequacy and Security, not Distribution System Adequacy and Security. The existing standard does not mention Distribution Provider(s).	Consumers
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**Consideration:** Load shedding included as part of a SPS could involve the Distribution Provider's facilities.

4 and 6	M4-1; M4-2; M4-3; M4-4; M6-1; M6-2	Wording for the Requirements are exact duplicates of the measures. Suggest measures says something like "have documentation of", or "have evidence of" similar to other measures.	MAPP Planning Standards Subcommittee
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**Consideration:** Load shedding included as part of a SPS could involve the Distribution Provider's facilities.

Section 6 Compliance Monitoring Process refers to Regional Reliability Council, in stead it should refer to Compliance Monitor or Reliability Authority whichever is applicable. Ed Davis Entergy

**Consideration:** Agreed – the SDT changed these references throughout Version 0 planning standards to indicate what entity would serve as the Compliance Monitor. In most cases, the SDT did not change the RRO (or RRC) to the Planning Authority, because If these changes were implemented, the 'wide area' concept used to manage planning activities may be lost. If Regions register to become Planning Authorities, then compliance must be assessed by an 'Unaffiliated Third Party' – and it may not be possible to turn over compliance for so many requirements in time to be ready to assess compliance when these standards are implemented (expected implementation date is February 9, 2005). If Regions don't register to become Planning Authorities, then many smaller entities could assume responsibility for requirements that were intended to have a 'wide area' perspective.

M6-2            The "shall have evidence" phrase is vague and may be unnecessary considering that the        NIPSCO  
requesting entity should know if its requested information is supplied.

Consideration: The SDT tried to find a clean conversion for the truncated statements that were included in the original 'Items to be Measured' sections of existing Compliance Templates. When the standard states that the entity must provide documentation to the Region, how does the entity show that this was done – the entity provides evidence. The SDT did not intend to add any new requirements – the requirement to provide the document already exists.

**Standard 070**

**Summary Consideration:** Based on Industry comments, sections 2 and 3 of this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on those sections of this standard. Sections 1 and 4 will be included in Version 0.

The SDT made the following additional changes to Standard 070:

- Added the following language to R1-1 to more closely match the language in the source document:  
 “The overall regional system restoration plan . . .
- Changed ‘Region’ and ‘Regional Reliability Council’ to ‘Regional Reliability Organization’
- Made minor format changes for consistency

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE Guy Zito NPCC
<p><b>Consideration:</b> The first and fourth Section of Standard 070 (translation of IV A) have been through the entire standards development cycle and will be included in Version 0 – Sections 2 and 3 will not be included in Version 0.</p>			
ALL	ALL	Throughout Standard 070, it appears that "Restoration Plan", "Reliability Authority's system restoration plan", "regional blackstart capability plan", and "Regional Reliability Council's blackstart capability plan" are used interchangeably. A defined term should be used throughout 070 and applied throughout 070 and 071.	MAPP Planning Standards Subcommittee
<p><b>Consideration:</b> The SDT made an ‘equal’ translation of the existing language. Where, ‘restoration plan’ was used in the source document, the same term was used in the translation. Making changes to the titles of the plans being referenced would change the requirement and wasn’t done. The restoration plan and restoration plan are not the same.</p>			
		Regional Reliability Council should be replaced with Reliability Authority throughout this standard.	Ed Davis Entergy
<p><b>Consideration:</b> Where RRC was retained, it was replaced with RRO. The SDT declined to change this requirement to reassign it to the RA.</p>			
		Reference to 30 Business Days in at several places in this standard is not appropriate, these should be 30 (calendar) days. 30 days and 30 Business day appears to have been	Ed Davis Entergy

## Comments on Standard 070

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used in the original standard with no logical reasons.

Consideration: The suggested change was made to Section 1 and 4.

### Comments on Section 1

1	R1-1	Item #3 within section 1 states that one third of blackstart units shall be tested annually when Requirement R2-1 states in the last sentence that unit testing must be performed at least every five years? Furthermore, should Standard 070 be changed to test the blackstart units once every three years to better align with the NERC Operating Standards? Here may be one example of redundancy between operating standards and planning standards.	MAPP Planning Standards Subcommittee
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Consideration: R2-1 doesn't require 'unit' testing, it requires testing of the overall blackstart 'plan'.

The industry was divided on whether to eliminate redundancies and the SDT defaulted to leaving this requirement in this standard. This is a good comment for Version 1.

1	R1-1	The phrase "as appropriate" is repeated. The second phrase should be deleted.	MAPP Planning Standards Subcommittee
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Consideration: Agreed – the extra phrase has been removed.

1	R1-1	There seems to be a superscript of "1" within item #1. There does not appear to be any information in a footnote explaining superscript #1. Perhaps the footnote is supposed to be derived within 070, Section 4 according to the comments within Section 4.	MAPP Planning Standards Subcommittee
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Consideration: The superscript was for the footnote that appeared with the first draft – the omission of the footnote will be corrected in the next draft. The footnote provides a qualifying statement copied from the source document's M4.

1	R1-2	System blackstart capability plans need to be reported to NERC within 30 business days of a request. Other Standards within Version 0 say that information must be provided to NERC "upon request", which may mean 5 days or 30 days. Consistency between the standards should be applied to insure that "upon request" means either 5 days or 30 days.	MAPP Planning Standards Subcommittee
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Consideration: Several different timeframes have been used for 'upon request.' In determining whether to use a '5 day' or '30 day' timeframe, consideration was given (by various drafting teams) to the length of time needed to assemble the requested documentation and the criticality of

**Comments on Standard 070**

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the data. This has been changed to 30 calendar days for consistency.

1 M1 Should be numbered as M1-1 for consistency. Consumers

Consideration: Agreed – this was revised.

1 M2 Should be numbered as M1-2 for consistency. Consumers

Consideration: Agreed – this was revised.

32) std 070 Section 1 -Compliance Monitoring Process: Need to clarify whether 90 days refers to 90 business days. Guy Zito NPCC  
Pete Henderdson  
IMO

Consideration: Note that the standard states, '30 days' – not '90 days'. This was 30 days, not 90 days – and has been changed to 30 calendar days.

**Comments on Section 2 - The SDT did not consider these comments because this section has been removed from Version 0.**

2 This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 070, Section 1. Also it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard. Bob Millard  
MAIN

2 R2-1 Requirement R2-1 states in the last sentence that unit testing must be performed at least every five years while item #3 under R1-1 states that one third of blackstart units shall be tested annually. MAPP Planning  
Standards  
Subcommittee

2 R2-1 Should Standard 070 be changed to test the blackstart units once every three years to better align with the NERC Operating Standards? Here may be one example of redundancy between operating standards and planning standards. MAPP Planning  
Standards  
Subcommittee

2 R2-1 The Standard Language that was dropped in Section 2 does not seem to be fully captured in the requirements. The Standard Language introduces the idea of Regional coordination in developing a blackstart plan. It is only once a regional plan is developed can an analysis be performed to determine if the blackstart plan is sufficient. It is recommended to broaden Applicability to include Regional Reliability Councils for coordination purposes. MAPP Planning  
Standards  
Subcommittee

**Consideration:**

2	R2-2	Documentation of the most recent blackstart tests would most likely be obtained by the Regional Reliability Councils with participation by the Transmission Operators therefore broadening section 2 applicability to include Transmission Operators as well as Regional Reliability Councils.	MAPP Planning Standards Subcommittee
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**Comments on Section 3 - The SDT did not consider these comments because this section has been removed from Version 0.**

3		This section should not move forward in Version 0 since it is more procedure/data oriented, not really stand alone "standard" material but more tools or reference material for executing a standard.	Bob Millard MAIN
		Section 3 Applicability should include Reliability Authority along with Transmission Operator.	Ed Davis Entergy

**Comments on Section 4**

4	Applicability	It appears that the phrase "Generator Owner or Generator Operator" should be under the Applicability heading. It appears that phrase is in the wrong location.	MAPP Planning Standards Subcommittee
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**Consideration: The 'Applicability' section will not be part of the format of Version 0 Standards.**

4	R4-1	"Generator Operator" should be expanded to include "Generator Operator or Generator Owner".	MAPP Planning Standards Subcommittee
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**Consideration: Requirement R4-1 is assigned to the entity that is responsible for performing the tests – and according to the Functional Model, this is the Generator Operator – so the SDT did not add the Generator Owner to this requirement.**

R4-2 should include that the test results will be provided to Reliability Authority and Transmission Operators in place or Regional Reliability Council.	Ed Davis Entergy
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**Consideration: The existing requirements state that the test results will be provided to "... the Region and upon request to NERC." Expanding on this list needs to be a change addressed in Version 1.**

**Comments on Standard 070**

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33) std 070 Section 4 -Compliance Monitoring Process:Need to clarify whether 90 days refers to 90 business days.

Guy Zito NPCC

Pete Henderdson  
IMO

Consideration: The standard states, '30 days' not '90 days'. The SDT defaulted to leaving this time period as is, and assumes that this is 30 calendar days.

**Standard 071**

**Summary Consideration:** Based on Industry comments, this standard will not be included in Version 0 and the SDT did not draft consideration of the comments submitted on this standard.

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
		This entire standard should not move forward in Version 0 since it is more limited in its uses and does not appear to be needed as a nation wide standard at this time.	Bob Millard MAIN
		Regional Reliability Councils referred throughout this standard should be replaced with Reliability Authority.	Ed Davis Entergy
		This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0	Brandian ISO-NE Guy Zito NPCC

**Comments on Section 1**

1	R1-2	Applicable NERC Standards should be changed to the specific NERC standards.	MAPP Planning Standards Subcommittee
		Section 1 should be applicable to Reliability Authorities rather than Regional Reliability Councils.	Ed Davis Entergy
	R-1	Level 1: Reliability Standard 071-R1-1 number 4 is quoted. "Number 4" should be deleted.	MAPP Planning Standards Subcommittee
1-4	R1-R4	Where automatic load resoration programs are in use to minimize restoration times, the requirements of this standard should be met. Therefore, suggest keeping these standards in Version 0.	
1-4	M1-4	There is only one measure for multiple standards in each of the sections. To be consistent with other standards in Version 0, there should be one measure for each standard.	MAPP Planning Standards Subcommittee
	M1-1	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
		Level 3: "as defined above in Reliability Standard 071-M1-1" should be deleted	MAPP Planning Standards Subcommittee

**Comments on Standard 071**

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1 On page 4 of 10, section 1 of levels of noncompliance - We believe the reference (Reliability Standard 071-R1-1 number 4) should be (Reliability Standard 071-R1-1 element d). Peter Mackin  
TANC

**Comments on Section 2**

1-4 R1-R4 Where automatic load resoration programs are in use to minimize restoration times, the requirements of this standard should be met. Therefore, suggest keeping these standards in Version 0.

M2-1 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

**Comments on Section 3**

1-4 R1-R4 Where automatic load resoration programs are in use to minimize restoration times, the requirements of this standard should be met. Therefore, suggest keeping these standards in Version 0.

Section 3 Applicability should also include Reliability Authority under the definition of Responsible Entity. Ed Davis Entergy

R3-2 should refer to affected Regions rather than Regional Reliability Councils. Ed Davis Entergy

M3-1 The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied. NIPSCO

Section 3 Compliance Monitoring Process does not appear to be complete as it does not provide sufficient details. Ed Davis Entergy

**Comments on Section 4**

1-4 R1-R4 Where automatic load resoration programs are in use to minimize restoration times, the requirements of this standard should be met. Therefore, suggest keeping these standards in Version 0.

R4-2 refers to providing the documentation to affected Regional Reliability Councils, it should be referring to Regions, or Reliability Authorities. Ed Davis Entergy

M4-1	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.	NIPSCO
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**Standard 072**

**Summary Consideration:**

The SDT made the following changes to Standard 072:

- Changed 'Region' and 'Regional Reliability Council' to 'Regional Reliability Organization'
- Made minor format changes for consistency

**General comments and comments on entire standard**

Section	Requirement or Measure	Comment	Commenter
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		The entire format is inconsistent with the format established for standards 051-071	Charles Matessa BG&E
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Consideration: Agreed. This is a direct translation of the existing standard, and included far more details than other existing standards. The format should look more consistent in the next draft, but will continue to look more like Version 1 standards than other Version 0 standards.

**Comments on Purpose**

Purpose	Missing the following from the Purpose ... " reported to the appropriate Regional Reliability Council."	FRCC
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Consideration: Agreed – this has been corrected

	Purpose statement is incomplete. Whom the vegetation related outages should be reported to?	Ed Davis Entergy
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Consideration: Agreed – this has been corrected to indicate that outages are reported to the RRO.

**Comments on Section 1**

Section 1	R1-1	Should capitalize "Transmission Owner"	FRCC
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Consideration: Agreed – this has been corrected.

1	R1-1	Suggest changing "transmission owner" to "Transmission Owner"	MAPP Planning
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**Comments on Standard 072**

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Standards  
Subcommittee

**Consideration: Agreed – this has been corrected.**

1 levels Suggest replacing "transmission owner" with "Transmission Owner" in the two places this occurs

MAPP Planning  
Standards  
Subcommittee

**Consideration: Agreed – this has been corrected.**

Requirements should refer to Reliability Authority rather than Regional Reliability Council.

Ed Davis Entergy

**Consideration: The SDT declined to make this change because this would a change to the intent of the standard.**

34) std 072 Section 1 -R1-2:The standard 072 mentions that vegetation related outages to be reported to “Regional Reliability Council”. We are of the opinion that the Transmission Owner should report the vegetation related outages to its concerned “Reliability Authority” in order to be consistent with all present practices and process. Accordingly, we suggest the same to be incorporated in the applicable section 1 of standard 072 as follows: “... to its Reliability Authority all vegetation-related outages ...” shall be read instead of “... to its Regional Reliability Council all vegetation-related outages ...”.

Guy Zito NPCC

Pete Henderson  
IMO

**Response: The SDT declined to make this change because this would a change to the intent of the standard.**

35) std 072 Section 1 -Compliance Monitoring Process, Periodic Reporting, Compliance Monitoring Responsibilities:“... Regional Reliability Council shall report ...” shall be read instead of “The Region shall report ...” to be consistent with the Standard.

Guy Zito NPCC

Pete Henderson  
IMO

**Consideration: The language has been changed to use the term, Regional Reliability Organization for consistency with other Version 0 standards**

1 compliance Several places "Region" is used. Suggest replacing with "Regional Reliability Council"

MAPP Planning  
Standards  
Subcommittee

**Comments on Standard 072**

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Consideration: The language has been changed to use the term, Regional Reliability Organization for consistency with other Version 0 standards

It is not included if the Self Certification needs to be sent to the Compliance Monitor or some other entities. Ed Davis Entergy

Consideration: The default is that self-certification forms always go to the Compliance Monitor. In trying to keep these standards as succinct as possible, this additional language was not included.

Section 1 Compliance Monitoring Process should also refer to Transmission Operator in addition to Transmission Owner. Ed Davis Entergy

Consideration: This requirement is limited to the Transmission Owner, so this change wasn't added.

Section 1 Levels of Non Compliance are in correct format. This does not show levels. Ed Davis Entergy

Consideration: Agreed – this has been corrected.