

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization:					
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments Group Name: SERC Planning Standards Subcommittee (PSS)					
Lead Contact Bob Jones (PSS Chair)		Organization: Southern Company Services			
Telephone: (205) 257-6148		Email: rajones@southernco.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Art Brown	South Carolina Public Service Authority	1	Darrell Pace	Alabama Electric Cooperative	1
David Weekley	Municipal Electric Authority of Georgia	1	Kham Vongkhamchanh	Entergy	1
Bob Jones	Southern Company Services	1	Clay Young	South Carolina Electric & Gas	3
Pat Huntley	SERC	2	Brian Moss	Duke Energy	1

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As stated, this assumes acceptable improvements are made in response to comments.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

See responses to questions 11 and 12.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

This type of change should be addressed in Version 1.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

The SERC Planning Standards Subcommittee has no response to this question since it is addressing an operating issue.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The SERC Planning Standards Subcommittee has no response to this question since it is addressing an operating issue.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

The ATC and CBM portions of the I.E1 and I.E2 measurements address business practices and should be deleted from Version 0. The TTC and TRM portions of the I.E1 and I.E2 measurements address reliability issues and should be retained in Version 0.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The SERC Planning Standards Subcommittee has no response to this question since it is addressing an operating issue.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The SERC Planning Standards Subcommittee has no response to this question since it is addressing an operating issue.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

There were a significant number of comments recommending numerous "fixes" to the III.C standards/measurements when they were field tested. These comments have not yet been addressed, and should be considered in Version 1. If any of the III.C measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

All Phase IV standards/measurements require significant "fixes" and should be considered in Version 1, not Version 0. However, we realize that there may be other factors influencing the decision to keep some of these in Version 0. If any Phase IV measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Some of the current Planning Standards list reporting requirements in "days" while others list it in "business days." A minor revision could be made in Version 0 to resolve this inconsistency.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Grant would approve as long as all standards reflect our current practices and do not increase our Control Area burdens, or infringe on our Control Area functions

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Changes to the content of Policy 9, and how current Reliability Coordinator functions are changed to comply with the NERC Functional Model, are very important to us. We do not believe that the Reliability Coordinator can be interchanged with the Reliability Authority, yet keep current contracts and States Rights preserved. We do feel that Control Areas should maintain the RA responsibilities, yet contract with the RCs to provide over all coordination. If we begin to feel that this ability is beginning to be taken away from us, we will consider this a "show stopper."

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

It seems that the material has been kept consistent.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Grant would like to encourage the Drafting Team to eliminate all redundancies in the policies. Grant feels Policy 9 is especially redundant with many other areas of the NERC Policies.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The Functional Model falls short in incorporating the functions of the Reliability Coordinator as used currently.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

To avoid confusion, Operating Authorities should only be used when collectively referring to the RA, BA , IA and PA functions, since these are the true "Authorities" in the NERC Functional Model.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Grant has no issues with these items

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Grant has no issues with these items.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
006			How will Indadvertant Interchange be paid back? Grant does not have the confidence that NAESB will establish an appropriate solution.
032		R1	It is not clear what proper certification requirements for each funtion. Grant is concerned of the ever increasing burden of training and certifying of System Operators. How will the current Certification structure meld with the proposed Version 0?
024		R10	"All Generator Operators shall operate their plant(s) so as to adhere to ramp schedules." This is not correct, by contract, generators have to perform to meet specifications that are required by their control area. This may or may not include ramp schedules. Non-dispatched generation (ie. wind generation) would not meet this by practice. Grant's thoughts on this would be to have the BA adhere to the ramp schedules only.
033 through 040		Multiple	Redundancies exist with these and other Standards. The reduncancies need to be identified and eliminated.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As promised in the SAR, NERC must not change existing Planning Standards. Planning Standards guides must not be disregarded. My understanding is that only formatting changes would be made.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

none

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

One of the goals of this project is to improve clarity. Duplication sort of does the opposite, especially if the duplications are not in the exact wording or context

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Except in cases where functional model terms were not used.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Service agreements are not consistent. In other cases, service agreements refer to regional or NERC standards. The standards need to be clear as to who has the obligation for each requirement.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The operating policies form the basis for reliable operations. Nothing should be removed from the version 0 standards while business practices are being developed. Once business practices are developed and approved, appropriate references to business practices can be made in the Version 1 reliability standards. This approach will provide some much needed continuity as we transition from a NERC standard world to one which has two sets of complimentary operating standards, one for NERC and one for NAESB.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

It would be unnecessarily confusing to break out additional business practices from the NERC standards at this time.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

The functional model seems to reflect an 'end state' of the industry that does not accurately reflect the various stages of transition in many regions of North America. It seems to work well for a region or area that has an RTO that has incorporated the reliability coordinator function and control area(balancing authority) functions over a wide area. It does not work well for an area or region with multiple control areas who are covered by a single reliability coordinator. In this case, the reliability coordinator can only do what is delegated by the existing control areas. If we understand the approach suggested in Question 9 correctly, which is to allow for flexible interpretation the functional model roles and tasks, then control areas could register as reliability authorities, with an understanding and perhaps a documented agreement in place that designates which functions are delegated to the Reliability Coordinator. If this understanding is correct, then we agree with the suggested approach.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Continued development of the concept, tools and procedures to implement the Interchange Authority should not be delayed by the Version 0 process.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Planning Standards guides must be kept by some method such as an appendix. The guides represent best practices related to summer 1996 blackout issues. Again, Version 0 is suppose to be only reformatting of the existing standards. Compliance measurements would not have to be fully implemented until the standards have been completely field tested. However, previous field tests have not resulted in substantial changes.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Planning Standards guides must be kept by some method such as an appendix. The guides represent best practices related to summer 1996 blackout issues. Again, Version 0 is suppose to be only reformatting of the existing standards. Compliance measurements would not have to be fully implemented until the standards have been completely field tested.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		R2	When is it practical to protect for multiple contingencies? The consequences are severe enough that you want to avoid them? It seems like the answer really keys on whether your Regional Reliability Council policy requires you to protect for multiple contingencies, so the reference to practical could be removed.
008		R1	Reporting every time an IROL or SOL is exceeded will create a lot of unnecessary work that yields no reliability benefit. Draft standard 200 assumes that the Reliability Authority will have visibility of flows in their area of responsibility such that they will know when an IROL or SOL is exceeded thus reporting by the Transmission Operator is only needed when a violation exceeds the 30 minute timeframe.
008		R1	Continued from above cell - This assumption is consistent with Version 0 Standard 015 which specifies that the Balancing Authority and Transmission Operator shall provide its Reliability Authority with operating data required for monitoring system conditions within the Reliability Authority Area.
051	1,2,3,4		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
051			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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
052			Suggest title to be expanded to “Transmission System Adequacy and Security Assessment by Regional Reliability Council” to differentiate this section from Sec 051.
053	1		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.
054			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.
058	5		title seems inconsistent with R5-1. Title indicates “Applicability in Eastern Interconnection...” while R5-1 indicates “each of the NERC interconnections...”
061			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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061			Standard Applicability includes the numbering from the old criteria and needs to be updated to correspond to the new standard.
061	4		Requirements includes the phrase “entities responsible for the reliability”. Shouldn’t this phrase be updated to include Functional Model terms?
061	5		includes “non-member demand data”. Can this term be defined better using Functional Model terms?
063	3		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
065	3		Applicability: The Transmission Planning and Planning Authority functions should be added for the network voltage determination and studies required.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
066	3		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.
068	3		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).
069	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.
069			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.
General			<p>1. Many titles of standards are vague – more description would be beneficial and individual suggestions are given below. The confusion with the Version 0 titles is especially acute since the standard is becoming quite large and difficult to wade through.</p> <p>2. The Applicably box should be located in the same place whether it is for a Standard or a Section.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Once a final draft of the Version 0 standards is complete, it should be reviewed for consistency between planning and operating standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:		WECC Interchange Scheduling and Accounting Subcommittee			
Organization:		WECC			
Telephone:		916-732-5519			
Email:		bschwer@smud.org			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input checked="" type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments		Group Name: WECC Interchange Scheduling and Accounting Subcommittee			
Lead Contact R. D. Schwermann		Organization: SMUD			
Telephone: 916-732-5519		Email: bschwer@smud.org			
Member Names	Organization	Segment	Member Names	Organization	Segment
R.D.Schwermann	SMUD	3	Bob Sullivan	CASIO	2
Al Gultzan	AESO	2	Shirley Buckmier	BPA	1
Jim Thomas	PNM	3	Marilyn Franz	SPPC	1
John Hormozi	LADWP	1	Mehdi Gandomi	CDWR	5
Mike McQuay	CAISO	2	Ann Davis	BPA	1
Judy Fregoso	TEP		Bob Harshbarger	PSEI	
Gene Goff	SPPC	1	Janella Battles	NEVP	
Paul Rice	WECC	2			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Version Zero is the translation into the new format of the existing standards. If there are no changes from what we have in front of us at the present we can support this effort. It is understood that as the policies undergo change we would reserve the right to make further comment.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

We see none at this time.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

The changes should be made to future documents. Version zero gives us a good baseline. If we make changes to the existing rules we will further complicate the process as they would necessitate significant review and comment

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The functional model is adequate at the present as defined. It is of concern to members of this comment group that regional functions are not defined, but we agree that the functional model accomodates what approaches are utilized in the WECC in present and future paradigms.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

At this early stage it would seem to be a safer course to leave the functional duties in the proposed practices as appropriate , rather than making the assumption that the external agreements will be executed.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Yes we agree that version zero standards reflect current policies, with the exception of not losing the efforts expended in the drafting teams which been working on their new standards such as the Policy Three Standard. Version Zero should capture the reliability functions and break out the BP's in version one documents.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

The commenters do not want to break out any BP's in version zero documents

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

The functional model accomodates current practices in the WECC. We agree that as long as the Reliability Corrdinator is held accountable only for their direct functions and there is no overlap in other functions of the FM, such as the BA. The Reliability Coordinators need to have a wide area view. The debate has not been settled in the WECC how we will view the RA function in the WECC and this debate is outside the scope of these comments from the Interchange and Scheduling Subcommittee.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

The Functional Model IA is not well defined in its present form and the WECC ISAS Commenters are in favor of a separate review of this function with additional comment period .

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M6	<input type="checkbox"/>	<input type="checkbox"/>
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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

The WECC ISAS feels this question is outside the scope of this comment group. (Interchange Scheduling)

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments
See item 11

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
006	R5		WECC has developed a dispute resolution procedure based on current NERC policy. WECC would continue to utilize this procedure.
010	R1	2.1 P3T3	The P3T3 template goes directly to Level 4. The WECC ISAS agrees with sanctions for tag violations, but think the practice as written is too stringent and there should be level 1 through 4 violations
006			The WECC ISAS does not see a methodology of paying back inadvertent in this procedure. We realize that NAESB has been handling this debate for quite some time, but until there is a NAESB solution this needs to be addressed in the NERC document
006	R5		R5 Speaks about Appendix 1F. Where will Appendix 1F reside? The WECC is currently revising (updating) our reconciliation process with a document that is in due process at this time and WECC will continue to utilize the WECC Process.
006	R4		The version 1 of this standard should review the language in the second sentence " Changes or corrections.." . The language should state that reliability functions should drive the after the fact process to reflect system interchange and not market conditions.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
010		R1	This document excludes the Policy 3 requirement of redoing a tag if there is a change of 25% . By excluding this existing language you are changing the scope of this document and not living with the version zero " no change direction"
010		R2	Clarify the last sentence - Such interchange shall be "tagged within 60 minutes" from the time that the interchange transaction begins
011	Regional Differences	R2	Losses are tagged separately in the WECC and we do not use the losses portion of the tag in its current form. WECC ISAS would ask for a regional difference to accommodate our current practice.
011		R1	The language needs to be clear that the generating entity receives the tag. We understand that NERC will hand off the tagging requirements to be covered in the NAESB standard but feel this needs to remain in this version zero document
013			25% deviation threshold - we feel that the proposed change would be appropriate for version one, but not for this document.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The untested Phase III and the entire Phase IV Planning Standards should not to be included in the Version 0 standards.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The untested Phase III and the entire Phase IV Planning Standards should not to be included in the Version 0 standards. Also, requirements for Generator testing have the potential to be a 'show stopper'. Such requirements fit better in Operating Agreements or Tariffs than they do in NERC reliability standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The guiding principal of the Version 0 efforts is that workable Version 0 Standards are approved by the NERC BOT in February 2005. "Acceptable improvements" means making those improvements to the first draft that will allow the Version 0 Standards to mimic the current Operating Policies and Planning Standards as much as possible while incorporating the NERC approved Functional Model. "Acceptable improvements" does not mean making changes in the Version 0 Standards that eliminate the ambiguous language and inadequacies of the current Policies and Standards. Transitioning from Version 0 to Version 1 Standards is when these improvements should be made.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

At this time there are no show stoppers.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

It would be ideal to make the improvements now. However making these improvements could cause a delay in obtaining NERC BOT approval in February 2005.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

I don't believe that the drafting team should assume that the reliability functions are addressed in the service agreements.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

A number of organizations are closely watching the development of Version 0 Standards. Any attempt to eliminate current measures may appear as an attempt to reduce reliability by the Industry. Correcting any flaws in the Standards should be achieved in the development of Version 1 Standards either through the normal or emergency SAR process. Particular compliance with tested but not revised Phase 3 and untested Phase 4 Planning standards should include some flexibility and forgiveness during the transition from Version 0 to Version 1.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

See comments under Question 11.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The Operation Policies contain Requirements and Guides. It is my understand that the drafting teams were given the instructions to transition only the Requirements to the Version 0 Standards. I believe that those Guides that are required to maintain Grid reliability, such as governor droop, will be lost in the transition from the Policies to the Version 0 Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Committer Information					
Name:					
Organization:					
Telephone:					
Email:					
NERC Region			Registered Ballot Body Segment		
<input type="checkbox"/> ERCOT		<input type="checkbox"/>	1 - Transmission Owners		
<input type="checkbox"/> ECAR		<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils		
<input type="checkbox"/> FRCC		<input type="checkbox"/>	3 - Load-serving Entities		
<input type="checkbox"/> MAAC		<input type="checkbox"/>	4 - Transmission-dependent Utilities		
<input type="checkbox"/> MAIN		<input type="checkbox"/>	5 - Electric Generators		
<input type="checkbox"/> MAPP		<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers		
<input checked="" type="checkbox"/> NPCC		<input type="checkbox"/>	7 - Large Electricity End Users		
<input type="checkbox"/> SERC		<input type="checkbox"/>	8 - Small Electricity End Users		
<input type="checkbox"/> SPP		<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities		
<input type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments Group Name: NPCC, CP9 Reliability Standards Working Group					
Lead Contact		Guy V. Zito		Organization: NPCC	
Telephone:		212-840-1070		Email: gzito@npcc.org	
Member Names	Organization	Segment	Member Names	Organization	Segment
Roger Champagne	TransEnergie HQ	1	Al Adamson	New York State Reliability Council	2
Ralph Rufrano	New York Power Authority	1	Michael Schiavone	Ngrid US	1
Kathleen Goodman	ISO New England	2	Patrick Doyle	TransEnergie HQ	1
Greg Campoli	New York ISO	2	David Kiguel	Hydro One Networks	1
David Little	Nova Scotia Power	1	Guy Zito	NPCC	2

Peter Lebro	Ngrid US	1	Brian Hogue	NPCC	2
Bonnie Bushnell	New York ISO	2	John Mosier	NPCC	2
John Norden	ISO- New England	2	Michael Schiavone	NGrid US	1
Donald Gates	ISO-New England	2	Michael Potisnak	ISO-NE	2
Khaqan Khan	the IMO (Ontario)	2			
James Castle	New York ISO	2	Glen Brown	NB Power	1
			Paul Roman	NPCC	2

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

NPCC's participating members agrees with the drafting team and believes phase III & IV should NOT be included in the Version 0 Standard. There is a concern for the compliance components, at this time in some cases, the compliance components are completely untested in the field or comments/experience received from the tests have not been assessed.

Until the division of responsibilities between NAESB and NERC is very clear, topics such as: The Time Control Standard and Inadvertent interchange standard requirement should be restored. Dropping or changing these requirements at this point in time disagrees with the premise of developing Version 0.

The Version 0 Standards, as they are presently written have not achieved the initial requirement of ensuring that they are clear, well defined measurable and crisp. Significant comments would need to be incorporated to meet this criteria. Suggestions are included in question 13 and 14.

Implementation plan and associated realistic time periods need to be developed prior to compliance monitoring and assessment; the Functional Model structure has not been fully incorporated at the industry level.

NPCC also offers our Bulk Power System, BPS, definition as indicated in previous comments and included in NPCC Document A-07, and also as follows and be used in the context of NERC Standards;

Bulk power system "BPS"— The interconnected electrical systems within northeastern North America comprising generation and transmission facilities on which faults or disturbances can have a significant adverse impact outside of the local area. In this context, local areas are determined by the Council members.

General comments on Planning Standards Translation:

NPCC's participating members believes the Requirements should refer to the "S" 's and not the writing of the measurements of the existing Planning Standards. For example, in Standard 051, the focus is shifted from (as labelled in S1) "The interconnected transmission systems shall..." to (as label in R1-1) "Assessments Requirements". So the Standard is on "assessing that the system meet Table 1 contingencies" and not the "System shall be planned to meet Table 1 contingencies". In the existing standard, assessment is a measure of compliance and that should be the same in the translation. Therefore, the R's in Version-0

should refer to the S's and the Measures should refer to the M's from the existing Planning Standards. So there should be as many R in Version-0 as there were S in the existing Planning Standards and as many measures in the new Version as there were in existing Planning Standards. So a new translation table should be provided in the 2nd draft of Version-0.

In the Background information from the Working Group, it is indicated that the Standard Applicability is referring to the NERC Functional Model functions. The Translation table refers to the Entity performing the function but we agree that Applicability should refer to the Entity. NPCC's participating members agrees with the WG that the numbering of the Standard should be improved to make a better translation to the present Planning Standards sequence: IA, IB...IIA, IIB... This will help to navigate more easily through the different issues that are covered by the Standards.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

NPCC's participating members believes that inclusion of the Phase III and IV Planning Templates/Measures that did not go through the complete NERC process of field testing-evaluation and revision and could therefore result in a broad rejection of the entire set of Version 0 Standards.

Overall NPCC's participating members support the NERC Version 0 Reliability Standards and the valuable efforts of the NERC SDT involved in the process to date. Please see specific details and comments as provided under Q13 and Q14 below.

Need to remove duplication and eliminate NAESB issues as appropriate to ensure that reliability issues remain paramount.

Lack of clear & consistent compliance process.

Examples of the inconsistencies are explained in the responses to questions 13&14.

Also the industry has communicated to NPCC that due to the translation of the Planning Standards and the removal of the existing S1, S2, ... that appears in the existing Standard Templates the standards have been “weakened”. The S language needs to be reintroduced for both clarity and strengthening of the Requirements of the Version 0 Standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

NPCC's participating members believe that the Planning translation appears to be reasonable, with the exception of the loss of the S1, S2 etc. language however, the Operating Policy Translations need additional work to address the initial requirement of ensuring that they are clear, well defined, measurable and crisp. Significant comments would need to be incorporated to meet this criteria.

NPCC's participating members believes there are some outstanding issues with respect to the Version 0 Planning Translation that may lead to misinterpretation (see Question 1 comments)

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

There is a duplication or redundancy of requirements in certain items of policy 5 and 9. There is a need for improvement to reduce these redundancies and better group the requirements.

A few standards that show duplications are identified below as examples:

(i) Standard 033 Requirement 8 and Standard 018 Requirement 3

(ii) Standard 034 Requirement 1 and Standard 019 Requirement 1

Where there are obvious inconsistencies, they should be resolved and redundancy removed, ONLY IF there is an exact duplication. Otherwise the redundancies should be left "as is". These will be addressed in the Version 1 Standards.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

NERC has outlined certain requirements related to “Regions” and translated existing terminology of “regions” to “Regional Reliability Council-RRC”. The RRC role is not specifically elaborated on in the NERC Functional Model-FM (approved ver 2), although RRC may be considered as a “delegate” of the “Standards Developer” referred to in the FM. While this may be an appropriate approach, we suggest that this terminology and appropriate role be specifically clarified/defined in the applicable version 0 standards or in reference document. We also note that there is inconsistency with the use of the term Regional Reliability Council, RRC, as opposed to Regional Reliability Organization, RRO. The term should be standardized and made consistent throughout the document.

NPCC also has endorsed Version 2 of the Functional Model as acceptable but improvement is required to better describe certain functions or to eliminate misconception of responsibilities. NPCC has concerns with the application of the Functional Model without further clarifications in this area. The outstanding issues that NPCC has commented on during the last posting of the FM, appear as an attachment at the end of this document, please see attached letter from E. Schwerdt. The description of the Planning Functions seems to be adequate.

The application of the FM to the industry is of concern and NPCC believes that an implementation plan along with associated timelines to allow the industry to achieve full will be vital to the Standards.

Version 0 should recognize jurisdictional differences in the allocation of tasks and responsibilities as per the Functional Model and that those differences should be adhered to.

An example is Standard 007 Requirement 3, bullets may be performed by the role of Transmission Operator or may be performed by different entities depending on the geographic location within and outside of the United States as well as the context of the specific Standard.

NPCC’s participating members suggests the Functional Model be revised to better reflect accountabilities of the TOP vs TOW or the addition of language allowing the use of Joint Operating Agreements, JOA, to work out details and refine responsibilities when necessary. A typical example is the “Transmission Operator, TOP” function in which some function/tasks are performed by one entity (e.g. ISO) and others by another entity (e.g. Transmissiion Owner, TOW). Otherwise, application of the currently approved FM may require that in some jurisdictions more than one entity register for the same function, which could lead to confusion.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Any entity which has impact on the reliability of the bulk power system should be included in the standards and their requirements clearly defined. To rely solely on service agreements which will all be negotiated by different entities with differing ideas may result in a degradation in reliability.

The term "functions" should be replaced with "accountable/responsible entities".

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

We tentatively agree to the potential business practice standards with the understanding that a further chance shall be given to elaborate/comment on these individual standards/requirements and agree with following condition/comment re: bulleted item # 2 as follows: “For purposes of Reliability, the RA shall have the ability to intervene for inadvertent energy payback, where applicable”.

Would best be targeted for future development(i.e. version 1)

There must be only one set of business practice rules and they must reside in one place. What is being proposed is that both NERC and NAESB will address the same business practices in what is being referred to as" Shadow mode" This is inappropriate and NPCC's participating members believe this will lead to jurisdictional issues and potential for conflict.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

NPCC's participating members suggest that ATC, TRM and CBM related standards be turned over to NAESB as business practices. Please note that at this moment, IMO's doesn't support that opinion.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Although NPCC’s participating members agree with assuming that today's RCs should be responsible for the listed RA requirements we do not agree that all control areas can become an RA or with the upward delegation being proposed. We don't believe any delegation upward is appropriate.

NPCC continues to ascertain that there should be a single clearly defined position of authority for overseeing and directing all bulk power system conditions and events for each contiguous electrical boundary/footprint.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

NPCC's participating members believe that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented and would be better served going through the SAR process for the Version 1

standards. Inconsistencies for compliance measuring may for the present, pose problems without further consideration. NPCC therefore strongly suggests that Phase III Planning Standards NOT be included in the set of Version 0 Standards.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

NPCC's participating members believe that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented and would be better served going through the SAR process for the Version 1 standards. Inconsistencies for compliance measuring may for the present, pose problems without further consideration. NPCC therefore strongly suggests that Phase IV Planning Standards NOT be included in the set of Version 0 Standards.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			In many cases the references to few of existing policies are either missing or are not mapped correctly within the new version 0 requirements. We are facilitating NERC SDT in this matter by identifying some of the inconsistencies or needs of references. The specifics are mentioned later:
001	Purpose		Reword the Purpose to read: “To maintain interconnection frequency within the defined limits and bound large net unscheduled tie line flows by balancing real power demand and supply in real-time.
001		-R3 -M1 -M2 -Compliance Monitoring Process -Levels of Non-Comp.	A new terminology “CPM1 & CPM2” is being used that is more related to “Standard under development: Standard 300”. The use of this terminology needs to be clarified or corrected.
002	Measures		There are references to ACE_m, which is not used in the calculations at all. Drop this unless a reason to keep is provided. There is also a lack of clarity in the test concerning ACE little m and ACE big M. Additionally one of the graphs shows a 10 min. duration without explanation. Is this related to the old 10 min. recovery period?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002	Notes		At a recent Resources Subcommittee meeting, the RS interpreted the second contingency rule to exclude off-line resources that were activated to provide contingency reserve. This was always the intent and the addition of a sentence to clarify this would be beneficial.
002		R4	Include the term “disturbance recovery criterion” preferably in the second paragraph.
002			Refer to DCS, not DCM
002		Compliance Monitoring	Drop references to the Performance Standard Training Document and refer to the Section in the Standard itself
003		-R2	R2's existing document references have been given as Policy 1C Requirements 2, 2.1, 2.1.1 and 2.1.2 whereas these requirements do not appear to exist in the original Policy 1C. In fact, the Version 0 standard 003 Requirement R2 has been derived from Policy1C Standards 1, 1.1, 1.1.1 and 1.1.2.
003		-R3	R3's existing document is also stated incorrectly as Policy 1C Requirement 2.2. Requirement 2.2 does NOT exist in the original Policy 1C. The standard 003 Requirement R3 has been derived from Policy 1C Standard 1.1.3. When computing bias, “several disturbances” is vaguely defined.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
003		-R4	<p>R4's existing document is stated incorrectly as Policy 1C Requirement 2.3 & 2.4. Requirements 2.3 & 2.4 do NOT exist in the original Policy 1C. The standard 003 Requirement R4 has been derived from Policy 1C Standard 1.1.4 & 1.1.5. The NERC Resources Subcommittee interpreted that the 1% minimum applies to the computations of Policy 1 Sections 2.1.1 and 2.1.2 [Standard 003, R2]. A specific sentence should be added to the end of R4 to define clearly its applicability. This is not a change in policy.</p>
003		-R5	<p>R5's existing document is also stated incorrectly as Policy 1C Requirement 2.5. Requirement 2.5 does NOT exist in the original Policy 1C. The standard 003 Requirement R5 has been derived from Policy 1C Standard 1.1.6</p>
004			<p>Proposed Version 0 does not appear to include information from the existing Policy 1D, Standard 2, Requirements 1, 2, 3, 1.1, 1.2, 5, 5.1, 6 & 7 from the existing Policy should be restored/added.</p> <p>Repeat answer from Question 7. This should remain a NERC standard.</p>
005		R1	<p>This should apply to Transmission Owners as well</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005		R2	Refer to CPS not CPM
005			Policy 1 Section 4.3.1.2 was omitted. It allows asynchronous Balancing Authorities to use alternative ACE equations other than tie line bias. NPCC requests this be added back.
005			Requirements 4.8.3.3 and 4.8.3.4 from the AGC section of Policy 1 have been removed. They were to be included in a 'notes section' that apparently doesn't exist.
005			Unlike the AIE survey, which was moved into the inadvertent section, the FRC survey was not moved into the frequency bias section. Please find a way to maintain this requirement.
005		<p>-Compliance Monitoring Process</p> <p>-Measures</p> <p>-Levels of Non-Compliance</p>	<p>- No information imported from existing document Policy 1E Requirement 2 4.8.3.3 & 4.8.3.4.</p> <p>- These are missing and needs to be added in Standard simultaneously.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
006		-R1	<p>006 does not appear to import any information from the corresponding existing document Policy 1F Requirements 5, 5.1, 5.1.1, 5.1.1.1, 5.1.1.2 and 5.1.2.</p> <p>Repeat answer from Question 7. This should remain a NERC standard.</p>
007		R1	<p>Add Reliability Authority to Functional Model entities</p>
007		R2	<p>Add Reliability Authority to Functional Model entities</p>
007		-R3	<p>In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL.</p> <p>These Standards must clearly identify, define and provide examples of what a SOL and IROL are. The reason for this is that this is not consistently interpreted by industry.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007			<p>In various locations in Policy 1 related material, there are survey and other requirements referred to in the Performance Standard Reference Document. These Requirements should be moved into the Standard. Also, although the strikeout version of Policy 1 shows a survey section, it was omitted from the translation.</p>
008			<p>Reference to Template P2T2 is missing.</p> <p>Should SOLs be reported to the Regional Council?</p>
008		<p>-R5</p> <p>-Measures</p> <p>Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>Policy 2A Requirement 2.1.1 does not exist. R5 is covered by Policy 2A Standard 2.1.</p> <p>In 3rd paragraph, ‘Control Area Operator’ should be replaced with ‘Balancing Authority’.</p> <p>This section is inconsistent with reporting of SOL and IROL violations to the RRO. The term RRO should be used consistently.</p> <p>In 3rd paragraph, ‘RELIABILITY COORDINATOR’ should be replaced with ‘Reliability Authority’.</p>
009		<p>R3</p> <p>-R8</p> <p>-Measures</p> <p>-Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>NERC Standards should not dictate how a market works. Remove “(self-provide or provide)”.</p> <p>In 2nd paragraph, Policy 2B Requirement 4.2 should be Policy 2B Requirement 3.2. R8 is covered by Policy 2B Requirement 4.</p> <p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		-R2	<p>A new task “Connectivity of adjacent Transmission Service Providers” is added for verification and assessment by the Transmission Service Providers in order to approve or deny an Interchange Transaction.</p> <p>Transmission Service Provider should be changed to Transmission Operator.</p>
011		-R2 -R2	<p>The 4th bullet should be amended to read "all interchange transactions" not "multiple interchange transactions".</p> <p>The 5th bullet is not included in existing policy - it makes sense to include it however it is a new requirement.</p>
012		-R1 -R2 -R3	<p>The reference for the last bullet should be Policy 3B, Requirement 4.1.3 instead of Policy 3C, Requirement 3.4.</p> <p>The reference should be Policy 3B, Requirement 1 instead of Policy 3B, Requirement 4.1.3.</p> <p>The reference should be Policy 3A, Requirement 6 instead of Requirement 1.</p>
013		-R4 -R5	<p>- This requirement includes the existing PSE responsibility for updating tags associated with dynamic schedules where they deviate by more than 25%. The drafting team is asking for acceptance of new criteria however a question is still raised whether for transactions >100MW the requirement is 10% or 25%. Which of this is required or appropriate.</p> <p>- The reference should be Policy 3D, Requirement 2.5.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014		R3 -Measures -Compliance Monitoring Process -Levels of Non Compliance	Change “to operating personnel” to “to its operating personnel.” Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously.
015		Applicability	Add Generator Owners and Load Serving Entities. Extend R5 to include these Functional Model entities.
017		-R6	Policy 4D Requirement 5.1 does not exist. R6 is covered by Policy 4D Requirement 6.
018		-R3 -R5	In 2nd paragraph, Policy 5A Requirement 2.2.1 does not exist. R3 is covered by Policy 5A Requirement 2.2. In 2nd paragraph, Policy 5A Requirement 5.1 does not exist. R5 is covered by Policy 5A Requirement 5.
018		-R6	- Second point is covered by Policy 5A Requirement 6.1 and not Requirement 6.2. - Third point missing reference to Policy 5A Requirement 6.2.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
019		R4	Even though this is a direct translation of the existing Policy, NPCC requests a clarification of the repeat back requirements, specifically are they for emergency, abnormal, normal, all of the above, provide specific examples
020		R5	Change the last bullet of R5, from Attach 5C to Attachment 1 and clarify that if the first 5 bullets cannot be completed in a timely fashion then you must move to manual load shedding immediately
020		-Attachment 1-	Under (1.) 'RELIABILITY COORDINATOR' should be replaced with 'Reliability Authority'.
023		R1	Change "operating personnel" to "its operating personnel."
024		R14	We recommend removing this Requirement which references Planning Standard II.B, which has not been field tested. Although NPCC believes II.B has merit, it should go through the SAR process.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		<p>R5</p> <p>R7</p> <p>-R1 Measures: -Compliance Monitoring Process - Levels of Non Compliance</p>	<p>Remove 1, 2, 3, 7, 8 and 9. NPCC recommends that the fuel related guides are not considered for translation into requirements.</p> <p>Does the term “as applicable” allow the Functional Model entities to choose which bullets apply to them?</p> <p>Reference to Policy 6B Requirement 1 is missing.</p> <p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and need to be defined in this</p>
025			<p>Potential additional elements of Requirement R5: We are of the opinion that at a minimum, critical existing requirements from “noted potential additional elements” should be made a part of Requirement R5, although they may included as guides in Policy 6B. Existing Template P6T1 outlines most of these requirements as mandatory.</p>
026		R2, 3, 4, 5, & 7	<p>The Requirements cited are “planning related “ and should not appear in the “operations related” requirements</p>
027		R4	<p>NPCC’s participating members are concerned that elements of Policy 5, Section E have not been sufficiently addressed in this translation.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		-R1	<p>R1's existing document references have been given as Policy 8C Requirements 1, 1.1 and 1.2 whereas these requirements do NOT exist in the original Policy 8C. In fact, the Version 0 standard 032 Requirement R1 has been derived from Policy 8C Standard 1.</p> <p>Requirement should apply only to positions that are directly responsible for complying with NERC. Please clarify</p>
032		R1.2	<p>“Positions that are directly responsible for complying with NERC.” Should be changed to;</p> <p>“Operating Personnel in positions that are directly responsible for complying with NERC.”</p> <p>To be consistent with the existing template P8T2</p>
033 & 018		R8 & R3	<p>There is duplication or redundancy of requirements between policy 5 and 9. Standard 033 Requirement 8 and Standard 018 Requirement 3 appear to be the same.</p>
033		R6	<p>The statement is inconsistent with the Functional Model. NPCC does not believe that in all cases an entity needs to be certified at the Reliability Authority level when they are carrying out a “delegated task”. i.e. a distribution operator carrying out load shedding on distribution feeders as delegated by the RA.</p>
033		R8	<p>At the end of R8, the inability to perform the directive AND WHY should be communicated to the RA.</p>
033		R9	<p>Please clarify and provide example(s) of what is meant by the “interest of other entity”.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
034		R3	The drafting team posed a question regarding whether TOs and BAs had an obligation to supply RA info. through SDX. This is not in existing policy and NPCC believes this is “out of the scope” of the version zero effort.
034		R1	NPCC’s participating members believe this is appropriately in this Standard and NOT in 029.
034		R5	Please clarify/define what is ”synchronized information system.”
034		R7	Please clarify/define what constitutes “adequate” analysis tools and “wide-area overview”.
038		R17	The Drafting Team comment appears to be making an incorrect reference. The correct reference is to Std 019. NPCC, at this juncture, does not agree to consolidate at this
051	all sections	Regional Differences	See NPCC BPS Definition in Question 1
051			NPCC feels this should be part of the Version 0 standard package. However the S language from the template should be added.
053	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)
053	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
054			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.
055 & 056			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.
54, 55, 56	Standards		Why do we need to have 3 standards related to the same existing Standard I.E?
54			"Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard." Should this statement not indicated also in 55 and 56?
057			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
059			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
061			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
062			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
062	Section 2 Section 3	R2-1 R3-1	If the Std remains in the Version 0; Delete specific about "Hydro-Québec Interconnection". Delete specific about "Hydro-Québec".
063			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.
064			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
065			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
066			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
068			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
070			This is a Phase 3 standard and NPCC believes

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			it is not appropriate for inclusion in Version 0
071			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

NPCC's participating members would note that there are numerous references to the Regional Reliability Council throughout the Version 0 Stds. However in Version 2 of the BOT approved Functional Model there is no mention of the definition of the role of the Regions.

NPCC's participating members would like to suggest, that for clarity, the Requirements as they appear in the Version zero standards should contain, where applicable, a header or title of what specifically the requirement refers to. In some cases it was unclear e.g. in Std. 038 R-16 which applies to the TTC ATC calculation process.

Further Comment on the Operating Standards:

std 007, 017, 018, 019, 021, 022, 023, 024 -Measures: Compliance Monitoring Process, -Levels of Non Compliance:

Note that the associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing from the above noted standards. We suggest that these standards should be reassessed in near future to determine the requirements for their associated measures and levels of non-compliance. Accordingly, these should then be specified where applicable and considered necessary.

Comments on Planning Standards:

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

2) std 056 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

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

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

5) std 058 Section 6 -R6-1:

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

- 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.

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.

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.

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.

9) std 059 Section 4 -R4-1, first & second paragraph:

- “... provide the Regional Reliability Councils with ...” shall be read instead of “... provide the Regions with ...” to be consistent with the Standard.

- “... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.

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.

11) std 061 Standard Applicability:

- This standard is applicable to the Regional Reliability Councils which are not defined in the NERC’s Functional Model.

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

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.

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

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?

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.

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.

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.

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.

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.

20) std 062 Standard Applicability:

This standard is applicable to the Regional Reliability Councils which are not defined in the NERC’s Functional Model.

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 ...” .

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.

24) std 064 Section 1 -Requirements (M1-4):

Need to clarify whether 30 days or 30 business days.

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.

26) std 067 Section 1 -Requirements (R1-2, R1-3):

-Compliance Monitoring Process:

Need to clarify whether 30 days or 30 business days.

27) std 067 Section 2 -Requirements (R2-2):

Need to clarify whether 30 days or 30 business days.

28) std 067 Section 2 -Measure:

No measures specified.

29) std 067 Section 2 -Compliance Monitoring Process:

Need to clarify whether 30 days or 30 business days.

30) std 067 Section 3 -Requirements (R3-2): Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

31) std 067 Section 4 -Requirements (R4-2):Compliance Monitoring Process:

Need to clarify whether 90 days refers to 90 business days.

32) std 070 Section 1 -Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

**33) std 070 Section 4 -Compliance Monitoring Process:
Need to clarify whether 30 days refers to 30 business days.**

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 ...”.

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.

OTHER COMMENTS

NPCC's participating members suggest that with regards to Version 0 standards, an updated glossary of terms and definitions should be developed and made available to the industry.

We suggest that in version 0 standard, a reference or a link to the associated NAESB BPS should also be provided, as and where applicable (especially in standards related to Policy).

In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL. standard 7, R-3

Overall the NPCC's participating members support the NERC Version 0 Reliability Standards and the efforts of NERC-SDT involved in it.

At a recent Resources Subcommittee meeting, the RS interpreted the second contingency rule to exclude off line resources that were activated to provide contingency reserve. Basically, if a resource is started up to provide contingency reserve and trips off while providing it, this is not a second contingency. This was always the intent, and to add a sentence now to make it explicit would be useful and is not a change in policy.

These Standards must clearly identify, define and provide examples of what a SOL and IROL are. The reason for this is that this is not consistently interpreted by industry.

NPCC believes that in the Planning Translations, the removal of the S1, S2 etc. language has introduced vagaries to the Standards that may lead to misinterpretations. NPCC suggests that the drafting team review each translation and consider the reintroduction of the “S” statement from the existing Templates to provide clarity and recapture details that may have been lost in this translation. NPCC suggests the “S” statement language appear at the beginning of the Requirement Section for each Standard.

Table : Comments related to either missing or inconsistent References [Version 0 Operating Standards]

Version 0 Standard #	Requirement or Measure #	Comments
003	-R2	R2's existing document references have been given as Policy 1C Requirements 2, 2.1, ,2.1.1 and 2.1.2 whereas these requirements do not appear to exist in the original Policy 1C. In fact, the Version 0 standard 003 Requirement R2 has been derived from Policy1C Standards 1, 1.1, 1.1.1 and 1.1.2.
	-R3	R3's existing document is also stated incorrectly as Policy 1C Requirement 2.2. Requirement 2.2 does NOT exist in the original Policy 1C. The standard 003 Requirement R3 has been derived from Policy 1C Standard 1.1.3.
	-R4	R4's existing document is stated incorrectly as Policy 1C Requirement 2.3 & 2.4. Requirements 2.3 & 2.4 do NOT exist in the original Policy 1C. The standard 003 Requirement R4 has been derived from Policy 1C Standard 1.1.4 & 1.1.5.
	-R5	R5's existing document is also stated incorrectly as Policy 1C Requirement 2.5. Requirement 2.5 does NOT exist in the original Policy 1C. The standard 003 Requirement R5 has been derived from Policy 1C Standard 1.1.6.
004		Proposed Version 0 does not appear to include information from the existing Policy 1D, Standard 2, Requirements 1, 2, 3, 1.1, 1.2, 5, 5.1, 6 &7. Is this intentional?
006	-R1	006 does not appear to import any information from the corresponding existing document Policy 1F Requirements 5, 5.1, 5.1.1, 5.1.1.1, 5.1.1.2 and 5.1.2.
008	-Standard 008	Reference to Template P2T2 is missing.
	-R5	Policy 2A Requirement 2.1.1 does not exist. R5 is covered by Policy 2A Standard 2.1
009	-R8	In 2 nd paragraph, Policy 2B Requirement 4.2 does not exist. R8 is covered by Policy 2B Requirement 4.
010	-R2	This is a combination of Policy 3A Requirement 2.1 & 2.4.1 not just a translation of Requirement 2.4.1.
	-R3	This is a translation of Requirement 2.1 not 2.4.1.
012	-R1	The reference for the last bullet should be Policy 3B, Requirement 4.1.3 instead of Policy 3C, Requirement 3.4
	-R2	The reference should be Policy 3B, Requirement 1 instead of Policy 3B, Requirement 4.1.3
	-R3	The reference should be Policy 3A, Requirement 6 instead of Requirement 1
013	-R5	The reference should be Policy 3D, Requirement 2.5
017	-R6	Policy 4D Requirement 5.1 does not exist. R6 is covered by Policy 4D Requirement 6.

018	-R3	In 2 nd paragraph, Policy 5A Requirement 2.2.1 does not exist. R3 is covered by Policy 5A Requirement 2.2.
	-R5	In 2 nd paragraph, Policy 5A Requirement 5.1 does not exist. R5 is covered by Policy 5A Requirement 5.
	-R6	- Second point is covered by Policy 5A Requirement 6.1 and not Requirement 6.2. - Third point missing reference to Policy 5A Requirement 6.2.
019	-R1	Reference to Policy 5B Requirement 1 is missing.
	-R2	Reference to Policy 5B Requirement 2 is missing.
	-R4	Reference to Policy 5B Requirement 2.2 is missing.
020	-R3	Reference to Policy 5C is missing.
	-R4	Reference to Policy 5C Requirement 1 is missing.
	-R5	Reference to Policy 5C Requirement 2.1 is missing.
	-Levels of Non Compliance	Reference to Template P5T1 is missing.
021	-R1	Reference to Policy 5D Requirement 1 is missing.
	-R2	Reference to Policy 5D Requirement 2 is missing.
	-R3	References to Policy 5D Requirement 3 and Requirement 4 are missing.
	-R4	Reference to Policy 5D Requirement 5 is missing.
022	-R1	Reference to Policy 5F Requirement 1 is missing.
	-R2	Reference to Policy 5F Requirement 2 is missing.
	-R3	References to Policy 5F Requirement 3, Requirement 3.1, Requirement 3.2 and Requirement 3.3 are missing.
	-R4	Reference to Policy 5F Requirement 6 is missing.
	-R5	Reference to Policy 5F Requirement 7 is missing.
023	-R1	Reference to Policy 5G Requirement 1 is missing.
	-R2	Reference to Policy 5G Requirement 2 is missing.

	-R3	Reference to Policy 5G Requirement 3 is missing.
024	-R5	Policy 6A Requirement 1 1.2 does not exist. R5 is covered by Policy 6A Requirement 1.2.
	-R6	Policy 6A Requirement 2 2.1 does not exist. R6 is covered by Policy 6A Requirement 2.1.
	-R7	Policy 6A Requirement 2 2.2 does not exist. R7 is covered by Policy 6A Requirement 2.2.
	-R8	Policy 6A Requirement 2 2.3 does not exist. R8 is covered by Policy 6A Requirement 2.3.
	-R9	Policy 6A Requirement 2 2.4 does not exist. R9 is covered by Policy 6A Requirement 2.4.
	-R10	Policy 6A Requirement 2 2.5 does not exist. R10 is covered by Policy 6A Requirement 2.5.
	-R11	Policy 6A Requirement 2 2.6 does not exist. R11 is covered by Policy 6A Requirement 2.6.
	-R17	References to Policy 6A Requirement 6.3.1 and Requirement 6.3.2 are missing for points 1 and 2 respectively.
	-R18	Reference to Policy 6A Requirement 6.4 is missing.
	-R20	Policy 6A Requirement 6.6 does not exist. R20 is covered by Policy 6A Requirement 7.
025	-R1	Reference to Policy 6B Requirement 1 is missing.
027	-R1	Reference to Policy 6D Introduction is missing.
028	-Standard 028	Reference to Template P6T3 is missing
	-R1	Reference to Template P6T3 is missing belonging to bulleted items 1-7.
029	-R4	R4 (which talks about the language of communication used) refers Policy 7B Requirement 2 as its corresponding existing document. Whereas, the Policy 7B Requirement discusses a different topic, Inter Regional Security Network.
031	-R1	R1 may also need to include corresponding existing document Policy 8B's Requirements 1.5, 1.6 and 1.7.
032	-R1	R1's existing document references have been given as Policy 8C Requirements 1, 1.1 and 1.2 whereas these requirements do NOT exist in the original Policy 8C. In fact, the Version 0 standard 032 Requirement R1 has been derived from Policy 8C Standard 1.
	-M1	A reference of Policy 8C Standard 2 needs to be mentioned.
039	-R7	The reference should be Policy 9F Requirement 3.1 and 3.4 instead of Requirement 4

Attachment to NPCC CP9 Comment Questionnaire;



1515 BROADWAY, NEW YORK, NY 10036-8901 TELEPHONE: (212) 840-1070 FAX: (212) 302-2782

November 9, 2003

Mr. James Byrd
Chairman
NERC Functional Model Review Task Group
ONCOR
2233-B Mountain Creek Parkway
Dallas, TX 75211-6716

Subject: **NERC Reliability Functional Model**

Dear Jim,

The NPCC Executive Committee reviewed Version 2 of the NERC Reliability Functional Model at a recent meeting. Following discussion, they agreed to support this draft revision with the conditions that the uncertainties and deficiencies identified below are resolved in a subsequent version and reflected in the implementation plan for the model for consideration at the March Standing Committee meetings. NPCC supports allowing the standards development process to move forward during this period, rather than delaying approval until the issues outlined are addressed in March.

Significant strides have been made in the last months in defining and clarifying the individual reliability functions and you and the rest of the FMRTG are to be congratulated. However, much work still needs to be done to develop a blueprint describing how to integrate these basic building blocks into a reliable structure.

The integration of core real-time operations reliability functions needs to be addressed in those sections of the Functional Model dealing with the relationship between the functions and explicitly required in the implementation plan. These core functions include security analysis, transmission and generation dispatch, security unit commitment, AGC, interchange scheduling and curtailment, maintenance coordination, emergency operations and system restoration. The Board of Trustees' imperative contained in their post-blackout Near-Term Actions letter emphasizing that, "*systems are operated within their design criteria and within conditions known to be reliable through analytic study*", make this integration more than a secondary technical

specification. In addition, an unambiguous definition of contiguous electrical and physical operating area boundaries must be established.

Specific issues include the following:

1. Clarity of authority of entities performing the RA function over all core real-time operations reliability functions within their electrical boundary and geographic footprint.
2. Requirement for entities performing the RA function to have a contiguous electrical boundary/geographic footprint.
3. Clarify that the RA entity's system size needs to be consistent with the computational tools and communication capabilities available, and reliably manageable by operators should those tools and capabilities fail.
4. The model needs to clearly indicate that there should be no overlap in RA responsibilities and to preclude the possibility of multiple RA entities having control over common facilities.
5. Clarify that the boundary/footprint requirements for entities performing the BA function should be identified and should preclude generator-only BA areas.
6. Clarify that a BA entity should fall under the authority of a single RA entity and should be within the RA footprint.
7. Clarify that there should be a single IA entity within each RA footprint.

In conclusion, NPCC offers to continue to work with the FMRTG to address the concerns expressed. NPCC also recommends that other technical subject matter experts, such as the RCWG, ORS, and the IS be engaged to help move the development of the implementation of the Functional Model forward. These technical subject matter experts provide critical feedback to the Standing Committees on reliability issues, and their direct support of this effort could prove invaluable.

Thank you for your consideration these matters.

Sincerely yours,

Ed Schwerdt

Edward A. Schwerdt
Executive Director

EAS:jm
cc: NPCC Executive Committee

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name: Michael Kormos					
Organization: PJM					
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input checked="" type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments Group Name: PJM					
Lead Contact Michael Kormos		Organization: PJM			
Telephone:		Email:			
Member Names	Organization	Segment	Member Names	Organization	Segment
Michael Kormos	PJM	2			
Steven Herling	PJM	2			
Gerry Mellinger	PJM	2			
Frank Koza	PJM	2			
Bruce Balmat	PJM	2			
Joseph Willson	PJM	2			
Mark Kuras	PJM	2			
Albert DiCaprio	PJM	2			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

PJM could approve the current draft in its entirety, but if and only if the untested Phase III and the entire Phase IV Planning Standards were not to be included in the Version 0 standards.

PJM also has serious questions regarding the status of the unaddressed compliance enforcement issues such as Will financial penalties be categorically waived from Version 0; and Does NERC (with or without Region Council consent) reserve the right to invoke financial penalties?

The Levels of non-compliance are inconsistent with regards to the Levels and their impact on Reliability. Some are based on potential impacts on reliability while others are based on more direct impacts on reliability.

PJM would ask that the Team explicitly include a Foreword in its final Version 0 document noting that passage of the Version 0 requirements does not necessarily represent the Industry's Consensus or approval of each and every one of those requirements.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Given the fact that Version 0 is a reformatting of current Standards and Policies, PJM does not see any show stoppers, except as noted in question 1 for the planning standards. Inclusion of the PHASE IV Planning Standards would be a 'show stopper'.

Also, requirements for Generator testing have the potential to be a 'show stopper'. Such requirements fit better in Operating Agreements or Tariffs than they do in NERC reliability standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

PJM agrees that Version 0 is a reasonable translation.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Experience would suggest that redundancies should be eliminated whenever possible.

NERC has not been successful in transitional activities. New ventures (such as Tagging, TLRs, and Reliability Coordinators) have required a significant amount of time to correct the original products. The Standard process is a major transition for NERC and will probably take a significant amount of time to come to consensus - not for Version 0 which is no more than a rehash of the current Standards but for Versions 1 and beyond, thus leaving open for a long period of time the potential for redundant Standards and redundant penalties for non-compliance.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

PJM agrees that the designation is 'acceptable'.

As PJM points out in its specific comments; the Team's designations are not without errors. PJM would note that the use of BA and the omission of IA indicate a need for more representation from the Functional Model Team.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

The specific "Functional Category" must be included if the Version 0 Team intends to do a translation based on the Functional Model. The 'responsibility' for each requirement must be specified and assigned to whatever corporate organization registers for that category. How that organization carries out that requirement (i.e. using Market solutions or by contractual agreement) is not a NERC concern.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

PJM agrees that the specified areas can and should be ceded to NAESB and then allow for NAESB to decide whether or not to continue those requirements.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

PJM considers that the TLR requirements focus on transaction modification as the only solution to wide area congestion is an infringement on market solutions to congestion. PJM would prefer to have a NERC standard to relieve congestion and leave the solution of How to relieve the congestion to the RA or it Regional Council.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

PJM agrees with the recommendation - from a pragmatic perspective but not from a philosophic perspective.

To delegate upwards implies assigning the responsibility for a task from an entity with less responsibility to an entity with more authority. By definition the RA IS the entity with the highest authority, therefore it is incorrect to state that the RA is 'delegating up'.

NERC standards have become an issue mainly because those standards are not 'crisp'. What the Version 0 Team proposes is (at least for this requirement) to continue the old standards' lack of clarity. The RA is a set of responsibilities, and to the extent that today's Reliability Coordinators can meet the tasks set out in the RA category, those Reliability Coordinators can serve to fulfill the RA responsibilities. To the extent that the Reliability Coordinators cannot meet those tasks they risk being found non-compliant to a NERC RA standard. The probability is small that that will happen, hence PJM's pragmatic agreement to continue. But PJM notes that a blanket acceptance of all Reliability Coordinators as the organizations that serve to fulfill the RA responsibilities flies in the face of the objective of the Functional Model. Quite simply if a Reliability Coordinator does not have the authority to shed load without asking permission, then, by definition of RA, that Reliability Coordinator should NOT be certified as an RA.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

PJM agrees with the recommendation - from a pragmatic perspective but not from a philosophic perspective.

The reason PJM agrees to support the Team continuing without the IA function is that the time needed for the discussions to clarify this debate is not available. PJM does not agree that any 'new tools or procedures' would be needed to implement the simple requirement to implement a transaction. Transaction implementation is done today by control area to control area checkout and can be done tomorrow using the same process. The Functional Model's IA role does not mandate the elimination of BA to BA checkout, but that debate is best left to post Version 0 forums.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R1	Replace OC with STANDARDS DEVELOPER R1 references the NERC OC (The reference should be to the Standards Developer not to NERC and not to a committee)
002		all	Drop references to RSG Standards do not apply to RSG; responsibility is with BA RSG is "a way" to meet reserve obligations From INTRO, R1 holds RSG as responsible as BA; this can be a practice but it is not necessary as there are RSG models that don't hold entire RSG responsible. R5 indicates RSG has outage; outage is with BA not the Group.
002		Notes	Replace Resources Subcommittee with STANDARDS DEVELOPER R2 NOTES references the NERC RS (The reference should be to the Standards Developer not to NERC and not to a subcommittee)
005		R15	If the BA does not have a reliability requirement for Time Error, then the requirement to calibrate the Time error equipment is not needed
006		R5	Replace Resources Subcommittee with STANDARDS DEVELOPER R5 and Levels of Compliance reference the NERC RS (The reference should be to the Standards Developer not to NERC and not to a subcommittee)

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		R1 & R2	<p>RA vs. T-Oper</p> <p>Functional Model does not require T-Oper to have wide-area data, therefore R1 and R2 should be assigned to RA category.</p>
009		R3 & R10	<p>RA vs. BA</p> <p>Functional Model does not assume BA has transmission information, thus R3 should place reactive requirements on RA not BA</p> <p>R10 - RA (not BA) will be taking actions re voltage collapse</p>
009		R4 & R6	<p>RA vs. T-Oper</p> <p>R4 is another wide-area vs. local area issue</p> <p>R6 - T-Oper can't be held responsible to disperse Reactive over wide area</p>
014		R4	<p>RA vs. BA</p> <p>Functional Model does not assume BA has transmission information, thus R4 should place analysis requirements on RA not BA</p>
016		M1	<p>The MEASUREMENT seems to be a Requirement.</p> <p>A Measure could be to "have evidence that outages were reported."</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
019		R1	<p>Change generator voice communications requirement with RA to "voice OR data" instead of "voice AND data"</p> <p>In Market environment voice communication with generators is not necessarily required</p>
020		M1 & M2	<p>M1 - The MEASUREMENT seems to be a Requirement on Compliance Manager</p> <p>M2 - The MEASUREMENT is not measurable. Level of Assessment is totally subjective.</p>
021		R3	<p>RA vs. BA</p> <p>R3 should be applied to RA since BA may not have transmission overload information.</p>
022		R4	<p>Replace OC and DAWG with STANDARDS DEVELOPER</p> <p>R4 references the NERC OC and DAWG (The reference should be to the Standards Developer)</p>
024		R10 & R14	<p>PJM agrees that R10 is unenforceable (i.e. that generators shall adhere to ramp schedules)</p> <p>R14 is not a reliability issue as written (Testing of generators on request)</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R4 & R5 & R7	<p>RA vs. BA R4 (second bullet) should be applied to RA since BA may not have transmission information.</p> <p>Business activity R5 many are Generator Operator responsibilities (Delivers, fuel switching, fuel optimization) and are outside RA/BA responsibility.</p>
025		R7	<p>R7 (last bullet) has RA/BA "arranging for fuel deliveries" This is outside the responsibility of such entities</p>
026			<p>RA vs. BA</p> <p>R3 (coordination of load shedding) should be applied to RA since BA may not have wide area information. R7 (coordination of load shedding) should be applied to RA since BA may not have wide area information.</p>
027		R8	<p>RA vs. BA Restoration requires transmission information that BA is not required (by the Functional Model) to have. Requirements must be practical R8 - Verification of Restoration Plans may be simulated but it can't be tested without severe consequences (Isolating NY to test the Plans for NY may not be smiled upon)</p>
031		M1	<p>The MEASUREMENT seems to be a Requirement (shall review program)</p> <p>Measure could be that one has a documented program.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		M1	<p>The MEASUREMENT seems to be a Requirement (shall have certified personnel) Measure could be that one has documentation of Certification of all personnel.</p>
033		R2	<p>Replace OC with STANDARDS DEVELOPER</p> <p>R2 references the NERC OC (The reference should be to the Standards Developer)</p>
034		R7	<p>Requirements must be practical R7 - adequate analysis tools is not a 'crisp' requirement</p>
035		R3	<p>Requirements must be practical R3 - shall KNOW of all facilities that COULD result in IROL. This is not a 'crisp' requirement</p>
039		R4 & M1	<p>Replace OC with STANDARDS DEVELOPER</p> <p>R4 references the NERC OC (The reference should be to the Standards Developer)</p> <p>M1 - The MEASUREMENT seems to be a Requirement (shall conduct an investigation) Measure could be that one has evidence that IROL was relieved in 30 minutes.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The Version 0 Drafting Team must resist the temptation to make 'adjustments' (e.g. regarding Dynamic schedules) no matter how obvious it is to the Team. Such adjustments open the door for commenters to demand that other equally obvious adjustments be made.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Do not support implementation of untested standards found in Phase III and IV without testing.

More clarification is needed on how will any penalties actually will be applied with any violation of these standards.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Inclusion of untested standards, especially where it is unclear that there will comparable application of any violation enforcement, based on unit ownership.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Suggest reducing redundancies where possible.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Standard 055			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
Standard 060			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 REQUIEMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION
Standard 063			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 REQUIEMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION
Standard 064			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 REQUIEMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION
Standard 065			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 REQUIEMENTS AS WELL AS COMPARABLE SCHEDULING OF TESTING REQUIREMENTS FOR ALL GENERATION IN THE REGION

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Improvements to reduce redundancies would be acceptable if the consolidations are properly recorded and tracked.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

I don't understand the question. Do we agree "that this allocation of potential business standards" are what? We do believe this identification is a good initial step, and that the drafting team should work closely with NAESB in refining and assessing other instances where commercial considerations are inherent in the Version 0 language.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Standard 009 - Voltage and Reactive Control. Requirement R3 states: Each PURCHASING-SELLING ENTITY shall arrange for (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by each BALANCING AUTHORITY and/or TRANSMISSION OPERATOR" Policy 2B Requirement 2.1

It is not clear such "reactive resources" apply to a capacity type arrangement with suppliers, which is a widely used mechanism in many RTOs/ISOs, or rather some other supply arrangement. As this deals with an ancillary services product, there are commercial issues in both supplying that

product, and in its definition. To simply say "shall arrange for" is prohibitively vague in that it is unclear exactly what is being procured. NAESB, along with input from the IOS Subcommittee, could bring further clarification to the terms and measures of the service.

Standard 18 - Reliability Responsibilities and Authorities. Responding to emergencies is an appropriate requirement for all entities that can influence the integrity of the interconnected system. Responses by generators would include modifying their output in response to such emergency conditions. In many instances, these modifications to MW output or voltage support will correspond to currently defined ancillary services. To the extent possible, NAESB and the IOS Subcommittee should develop clearer definitions of these services, and the appropriate methodologies for their valuation and procurement.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

With appropriate field testing to be completed before implementation.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

With appropriate field testing to be completed before implementation.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization:					
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: Southern Company Services, Transmission, Planning, Operations and EMS					
Lead Contact Marc M. Butts		Organization: Southern Company Services			
Telephone: 205-257-4839		Email: mmbutts@southernco.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Jonathan Glidewell	Southern Company Services (SCS)	1	Jim Griffith	SCS	1
Mike Miller	SCS	1	James Ford	SCS	1
Raymond Vice	SCS	1	Doug McLaughlin	SCS	1
Dan Baisden	SCS	1	Bill Pope	Gulf Power Company	3
Rod Hardiman	SCS	1	Bobby Jones	SCS	1
Marc Butts	SCS	1	Monroe Landrum	SCS	1

Mike Oatts	SCS	1	Keith Calhoun	SCS	1
Phil Winston	Georgia Power Company	3			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As stated in the opening sentence, you are asking for approval based on the V-0 Standard as presented. As presented, major changes are necessary and the improvements are required to be shown in draft 2 of the Version 0 Standard before we will vote in favor of this Standard.

For example, phase III and phase IV Planning Standards are included in this draft of Version 0. Phase IV Standards have not been field tested and some of the Phase III were field tested but were rejected.

Additionally, there are numerous other areas within the Standard where the translation between original Policy and this Standard are in error.

In general, we support the overall effort to convert policy to standard but strongly urge the drafting team to consider the changes included within this comment form.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

**Phase III and Phase IV Planning Standards
Standard 24, Requirement 10
Interpretation of which entities are considered Operating Authorities**

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

See comments on question #2

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

These type changes should be addressed in Version 1. The goal in Version 0 is to interpret Policy whether or not it is duplicated in other areas of Policy.

Any apparent changes should be well documented and explained as to the purpose and the reason for the changes.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

It is unclear whether the question is asking for acceptance of the Functional Model or whether the Functional Model functions were properly applied to this Standard.

Assuming the latter is true, we have concerns about the translation of the Operating Authorities into this Standard.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

In Policy 5, there is a definition for Operating Authority and includes entities such as Control Areas (BA, TO) and Generator Operator. It specifically excludes the Reliability Coordinator but throughout this Standard, the V-0 DT has substituted Reliability Authority for Reliability Coordinator. If the RA is substituted for the RC, then the RA cannot be included as one of the entities known as an Operating Authority since RC's are excluded as an Operating Authority.

Also, the entities described as the OA according to Policy 5 do not include LSE, PSE, GO or TSP.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The list above does not include all business practices that should be developed by NAESB in their V-0 Standard.

The OC subcommittees provided significant input to the drafting team regarding business practices contained in existing NERC policies. We recommend the V-0 drafting team reconsider those items to be assigned to NAESB for development.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Policy 9, Appendix 9C1, 9C1B, and 9C1C (TLR and Reallocation procedures) are predominantly business practices. NERC should consider extracting the reliability components from the TLR procedures and encourage NAESB to develop the appropriate business practices.

The ACE equation special cases in Policy 1 Appendix 1D. The RS identified these as business practices that should be removed from Policy. NAESB should develop them as business practice Standard.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

In the statement above it says "In these regions, the Reliability Authority may delegate tasks "upward" to a Reliability Coordinator organization....." While there's no RC in the new functional model language how would someone delegate "upwards" to a RC?

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

There were a significant number of comments recommending numerous "fixes" to the III.C standards/measurements when they were field tested. These comments have not yet been addressed, and should be included in a SAR for Version 1. However, if any of the III.C measurements are included in Version 0, there should be some guarantee (RBB approval) that industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate. Without some

appropriate form of guarantee, all Phase III standards/measurements should be removed from Version 0.

In particular, under STd 65 IIC, there are some major concerns with all measurements M1-M12. This is our basis for voting that they be deleted. Specific examples can be provided if needed.

Bd of Trustees adopted the Phase III Standards but this does not mean Industry accepts them. The only way to guarantee that Industry accepts them is for the RBB to be allowed to approve them prior to Board adoption.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

No Phase IV Planning Standards should be included in Version 0. The sections related to generating plants needs to be reviewed and rewritten with input from Generator Owners/Operators to insure the requirements are reasonable and can be implemented by generators. The benefit versus risk issue with reactive, regulator and governor testing are of primary concerns. EEI has documented that several unit trips have occurred while performing some of these tests. It is suggested that each region address these topics jointly between planners,

system operators and generation owners to better define the impact and practicality of the subject testings or if other methods could be used to validate generator, excitation and governor data.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
1		M2	<ul style="list-style-type: none">- Suggest CPM2 be changed to CPS2 to preserve the Policy 1 designations- Reference Policy 1A Requirement 2.2.1 should be Performance Standard Reference Document, 1.2.1- Reference Policy 1A Requirement 2.2.2 should be Performance Standard Reference Document, 1.2.2- Reference Policy 1A Requirement 2.2.2.1 should be Performance Standard Reference Document, 1.2.2.1
2		Compliance Monitoring Process	Under Periodic Control, change CONTROL AREAS to BALANCING AUTHORITIES
7		R2	Existing Document Reference should cite Standard 1.1 rather than Requirement 1.1. Also, we concur that language and examples for multiple outage criteria should be addressed in future revisions along with better references of what constitutes a SOL or IROL violation.
8		R5	We don't believe that the Existing Document Reference shown, Requirement 2.1.1 exists in current policies. This should be referenced as Standard 2.1.
9		R8	The Existing Document Reference should be Requirement 4 rather than 4.2. There is no 4.2.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
9		R9	Same as above, there is no 4.1.
9			Guide 4 on DC Equipment does not appear to be included in the new standards.
12		Purpose	The word AGC should be removed.
18		Title	(Emergency) Reliability Responsibilities and Authorities Should be modified to include the Emergency Operations. For example : Emergency Reliability Responsibilities and Authorities. As written, you have to read the body of the standard to understand that it applies to emergency operations only. Note that these standards will not be associated with Policy 5 – Emergency Operations in the future and should have stand alone descriptive titles.
18		General	It would be useful to include an explicit explanation of why Policy 5A Requirement 1 was not included in Standard 018. We assume it is because it is redundant with Standard 008, but, as a general rule, any time a redundant section of policy is not included as a standard an explanation of why should be included in the comment section (business practice reference, reference document number or an explanation of why it is not applicable).

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
18		R3	Consider adding Market Operator to the list of Operating Authorities. Specifically, it should be included in R3 as being required to comply with all reliability directives and, perhaps, in R5 as being required to provide emergency assistance as requested.
18		R4 and R6	Should specify that the local RA will handle all communications with other potentially impacted Reliability Coordinators. As written (Reliability Authority or ...), these requirements could lead to multiple notifications and potential confusion as to exactly what action is going to happen or has taken place. In general, all communications with adjacent Reliability Authorities should be through the local Reliability Coordinator. (Note that R4 may intend that RA contact other RAs etc. but
19		Title	(Emergency) Communications and Coordination Modify title to include the word Emergency as noted in Std. 018 above.
20		Title	Modify title to read "Implementation of Emergency Capacity and Energy Plans"
24		R10	This requirement includes the following "All Generator Operators shall operate their plant(s) so as to adhere to ramp schedules." It should be pointed out that ramping requirements are viewed on a BA level and many individual Generators are not capable of adhering to a ramp schedule associated with a particular transaction, e.g. 10 minute ramp in the Eastern Interconnect. Generators should have agreements with BAs to assist.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
21		R1	Using both the Transmission Operator and the Balancing Authority as the responsible entities make sense, since each of them can impact SOL/IROL conditions on the transmission network. It is not clear at all, however, how the Balancing Authority will know what to do or when to do it unless directed by the Transmission Operator or the Reliability Authority. In fact, independent operation to manage SOL/IROL conditions on the transmission network without explicit direction from the Transmission Operator is not feasible.
21		General	We suggest that this standard be rewritten to direct the Transmission Operator to act independently to relieve SOL/IROL conditions in an emergency, up to and including directing the appropriate Balancing Authority(ies) to change reactive or real power output. Note that I assume that this should be done under the independent authority of the Transmission Operator rather than at the direction of the Reliability Authority only under emergency conditions. (Measure requires Ver. 1)
22		Purpose	Statement too wordy and broad. Should be shortened and kept to a functional description of the reason that the standard is required. For instance: To ensure that disturbances and unusual events that threaten the reliability of the Bulk Electric System are reported to the appropriate entities in sufficient detail for post analysis and to minimize the likelihood of similar events in the future.
22		R3	Making the Reliability Authority, Transmission Operator and Balancing Authority all responsible for disturbance reporting seems to be prone to causing confusion over who is doing what. We suggest making the Reliability Authority responsible for Disturbance Reporting with the Transmission Operator and Balancing Authority responsible for 1) identifying potential disturbances for reporting and 2) supporting the Reliability Coordinator in the data collection and analysis phases of the reporting process.
22		R3	Current wording seems to indicate that the Reliability Authority, Transmission Operator and Balancing Authority must all report independently on each disturbance. We do not believe that was the intent of the original language. Note that the DOE EIA-417 form does not use functional model terminology and refers to Control Areas and Reliability Coordinators.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
24		Title	Needs to be re-written to be more indicative of what the standard is about. We suggest “Operations Planning for Normal Conditions.”
24		General	Hierarchical structure seems to be implied, but not explicitly defined in the translation of Control Area and Reliability Coordinator language to functional model language. May want to consider writing requirements such that all Balancing Authorities and Transmission Operators within a given Reliability Authority’s area should coordinate their operations planning, etc. Reliability Authorities would then be responsible for coordination between each other, etc. Seems confusing
24		R14	We suggest that the authority to require real or reactive power testing be centralized at the Reliability Authority level only. Any Transmission Operator or Balancing Authority requiring such tests should coordinate through the Reliability Authority. (May require Ver. 1 Standard)
24		R17	Notification of transmission status or rating changes to Balancing Authorities should be limited to those that materially impact the Balancing Authority and may not be allowed under FERC order 889 if Balancing Authority is a market participant (in such cases only notification of limits on generation output will be permitted).
25		Title	Needs to be re-written to be more indicative of what the standard is about. We suggest “Operations Planning for Emergency Conditions.” Existing title seems to imply that it is for Operations Planning that you do only during an Emergency, not in preparation for the emergency.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
25		R1	Reference should be Policy 6, Section B, Requirement 1.
25		R3	Not clear that Operating Authority, as used in the Operating Policy Manual, refers only to Reliability Authority and Transmission Operator, although the use of IROL language does imply this. The Balancing Authority must also have a plan for shedding load to match generation to load and this should be part of his operations planning, however, this may be redundant with Policy 1 or R4 requirements and may not be considered an IROL. <i>Also seems that Distribution Provider and/or Load</i>
26		Purpose	Seems more like a requirement than a purpose. Shorten and simplify. Minor Issue. We agree with the Ver. 0 SDT that both the operations planning and implementation stages of load shedding are mingled in Policy 6, Section C. We recommend that they be separated into two distinct standards.
26		R1	Concept is certainly redundant. However, we couldn't find where the specific wording is set forth so succinctly in any other requirement.
26		General	Requirements R5 through R8 for Standard 026 follow standard 027 in my copy of the PDF document. Standard 21 and 22 are out of order.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
26		R4	Language of the standard does not appear to faithfully replicate the meaning of the original policy (Policy 6, Section C, Requirement 1.2.1). Policy says that automatic load shedding shall be “related to one of the following” conditions whereas the standard states that the operating authority “shall initiate automatic load shedding” upon one of the conditions occurring. This is a definite change in policy, whether intended or not. MAJOR ISSUE.
27		R1	Language from Policy 6 applying to Control Areas does not fit well with functional model entities. Balancing Authorities and their associated Transmission Operators can not logically and independently develop plans to “reestablish its electric system.” Wording needs to be modified to reflect the interdependencies between functional model entities.
27		R2	R1 comment above also applies to restoration planning.
27		R4	We concur with the Ver. 0 SDT comment to R4 that the restoration of the integrity of the Interconnection should be explicitly emphasized as the penultimate goal of restoration activities.
27		General	Overall, these requirements seem to miss the interdependent nature of restoration planning or implementation in a functional model environment. In particular, the close coupling between black start units and transmission line switching and load pickup following a blackout is not well addressed (if it is addressed at all). This section needs major work. (May require Ver. 1 Standard)

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
28		General	Follows Compliance Template P6T2 which does not follow Operating Policy 6, Section D, but which was approved by the NERC Board of Trustees. There is no support in policy for this. Old Issue
29		R1	<p>The reference in the comment column is that “There may be redundancy here with Policy 5A Requirement 1” is not understood. The section referenced in Policy 5A – 1 concerns operating within SOL and IROL limits and does not address telecommunications facilities. Please clarify.</p> <p>Also, in searching the new standards a specific instance of the old Policy 5A Requirement 1 could not be found.</p>
29		R5	Add to Existing Document Reference: “Policy 7 – C1”
29		R6	Add to Existing Document Reference: “Policy 7 – D1”
30		Compliance Monitoring Process	The Data Retention requirement for this standard should be 1 year. The probability exists that over time, the job description and perhaps other documentation will be modified. There should not be a requirement to keep past versions of authorizing documents for an indefinite period of time.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
31		Measures	Should have an M2 indicating that training records shall be reviewed to ensure that the required 40 hours of training and drills in system emergencies was provided.
35		R1	The wording here changes Policy. Policy 9 used the word “may” when referring to monitoring of sub-transmission. Version 0 has replaced this with “shall” making it mandatory that the RA monitor sub-transmission. This is a change in policy.
38		7	The requirements here do not appear to come out of current NERC policy. This appears to be an instance where Version 0 is attempting to make policy.
38		R19	Policy 9C is referenced here when in fact it should be 9E
39		R7	We cannot find where in current policy this requirement comes from. This appears to be an instance where Version 0 is attempting to make policy.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Some of the current Planning Standards list reporting requirements in "days" while others list it in "business days." A minor revision could be made in Version 0 to resolve this inconsistency.

Std 10, R1 - The first sentence in the requirement should say "The load-serving PSE shall be responsible for tagging all Interchange Transactions except for those identified as being required by the Sink BA". The second sentence should pick up here and say "These Interchange Transactions (those that are between BA areas) shall include all transfers that are....etc." Otherwise, Requirement 3 of this Std 10 conflicts with Req. 1.

Std 11, R4 - There is not a requirement 4. However, there is a requirement 3 and 5. It needs renumbering.

Std 13, R2 - As worded, the expectations of the term "implementing" are ambiguous since it is unclear if that term implies communication of the modified Interchange Transaction tag by the Sink Balancing Authority, if it refers to the inclusion of the modified tag into the BA's Interchange Schedules and ACE equation, or both.

Std 13, R4 - Strictly from a reliability point of view, we would support the 10% deviation option over the 25% option for all transactions that are greater than 100MWs. The goal is to increase the accuracy of your reliability tool(s), i.e. IDC. For a one hour 700 MW transaction, there is the choice of your reliability tool being off by 70MW (10%) or 175MWS (25%). The 10% would be continuous and seems to be the best compromise from not imposing undue burden on smaller schedules to chase "noise" while still requiring large schedules to be tracked more closely than they are today with the 25% required in Policy 3. Also, we propose the following language to be more specific:"The Tag author or a Purchasing-Selling Entity responsible for tagging a DYNAMIC INTERCHANGE SCHEDULE shall modify the projected next hour schedule (not current hour schedule) when the last hour actual energy profile deviates from the projected next hour schedule as follows:....." When the proposed language talks about 10%, 25%, or 10 MWs deviations, are we assuming a plus/minus deviation?

Std 13, R5 - It only includes BA having the authority to modify a tag for reliability reasons. This does not match Requirement 1 of Std 13 which says the RA, TSP, Source and Sink BA are allowed to make reliability modifications. The PSE can be removed since it would modify only market related changes which is covered under NAESB.

Std 15 (34) , R3 (R3) - The requirement indicates that the operational data be exchanged "via the ISN". Better wording would be "via the ISN or other prevailing NERC sponsored exchange mechanism for a required type of operational data". This allows use of the SDX, Tagging, etc. that otherwise would be disallowed (or it would require redundant exchange of the same data via the ISN) in order to comply with R3. Policy 4B and the Appendix were written before SDX, Tagging, and RCIS when the ISN was expected to be the mechanism for the exchange of the data identified in the Standard 15 Appendix. Since NERC had developed alternative solutions to this, those solutions should be permitted in the Version 0.

In the "Operating Policies Markup", page P1-12, The section labeled "Guides", dealing with governor droop settings, doesn't seem to show up in the V0 standard. Will this be located in a reference document or some stand-alone guide in the future?

In the "Operating Policies Markup", page P1-23, The section labeled 2.1.3 "FRS Surveys" doesn't seem to show up in the V0 standard. Will this be located in a reference document or some stand-alone guide in the future?

Std 33, R8 - It appears the Reliability Authority (RA) will have agreements not only with the Balancing Authority (BA) and Transmission Operator (TO) as today, but also the Transmission Provider, Generation Owner, Generation Operator and Load Serving Entity. Requiring an agreement with the Generation Owner, Generation Operator and Load Serving Entity is a new twist. The reason for our interpretation is Policy 9 redline, A, 1.2 requires the RA to have clear decision making authority to act and to direct actions to be taken by BA, TO, Transmission Provider (TP), Generation Owner (GOw), Generation Operator (GOp), Load Serving Entity (LSE), and the Purchasing and Selling Entity (PSE). Several other sections refer to these same model entities in dealing with reliability. However, it appears to us from this re-write is the only two model entities that really provide any assistance to the RA are the TO and BA. Therefore, we question why the other model entities were required to have an agreement with the RA?

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

MidAmerican Energy Company (MEC) would not approve the planning standards as they appear today; but would approve the planning standards assuming acceptable improvements are made in response to our comments.

MEC commends the Version 0 Drafting Team on producing a reasonably faithful translation of the NERC Planning Standards including Compliance Templates into the Version 0 Standards, and incorporating NERC Functional Model nomenclature while under extraordinary schedule pressures. Unfortunately, the time frame that the Drafting Team was faced with for producing this first draft was not conducive for producing a fool-proof set of documents. We urge NERC to consider additional time for review, comment, and clean-up of the Version 0 Standards before balloting the standards.

MEC believes that one problem with the translation is the use of compliance templates for the planning standards which were adopted at different times. As a result, there are inconsistencies between standards and even within sections of standards. This is particularly noticeable in areas that are easy to compare, such as levels of noncompliance. For example, compare the levels of non-compliance of Section 3 of Standard 068 with the levels of non-compliance of the other sections of Standard 068. Section 3 provides that if a technical assessment did not address one of the requirements or was not provided it received a Level 4 Non Compliance; while in other sections there is a gradation of the levels of non compliance. In Section 5 of Standard 068, if the analysis is incomplete, the level of non compliance is listed as Level 1, while not providing the analysis is Level 4. This is because Section 3 is using a Compliance Template dated April, 2004, while Section 5 is using a Compliance Template dated October 9, 2000. Therefore, MEC urges the Drafting Team to review each standard as a whole for the purpose of improving the consistency from section to section.

MEC does not agree with the Drafting Team's approach of deleting the Planning Standard language from each section as being redundant to the more precise Compliance Template language. In some cases, the Standard language provides a better description of the overall direction and purpose of the Standard-writing that has resulted in the Compliance Templates. For example, Standard 051 deletes the old Standard S1 that provided a strong statement that "The interconnected transmission systems shall be planned, designed, and constructed such that...." with a weaker purpose statement that "System

simulations and associated assessments are required....". The weaker purpose is technically consistent with the Compliance Templates but leaves out so much of the big picture purpose for which the whole standard was written. If the current Compliance Templates do not accomplish all of the big picture yet, it is certainly lost by deleting it altogether before further work can be done.

Also note that given the time frame there are a number of minor errors in the Planning Standards that typically are not present in NERC Standards offered for comment. For example, in Standard 058, "quadrature" is misspelled as "quadrate". MEC asks the Drafting Team to extend the Team's review in the next draft round to allow the Team to correct these minor errors.

There is numerous references to the Regional Reliability Council in the Version 0 Planning Standards but no reference to the Regional Reliability Organization. The Drafting Team should clarify the role of the RRO with regard to the Version 0 standards.

In summary, MEC cannot support the Planning Standards that are provided in Version 0 as presented as being standards that are ready for compliance; however, MEC would support Planning Standards conditioned on acceptable changes being made to resolve our comments. MEC would support an effort to further clean the draft standards with an extra round of comments prior to ballot, and/or, adopting a trial use or best practices classification for certain standards that need more clean-up, field testing, or commenting prior to compliance.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

MEC does not support adoption for compliance of Phase IV non-field tested Planning Standards that have not gone through the SAR process or Phase III field-tested standards in which significant feedback from the field testing is not incorporated in the planning standards. Significant comments received during field testing Phase III Compliance Templates should be incorporated into the Version 0 Phase III Standards prior to adopting these Phase III Standards for

compliance. Also, Version 0 Phase IV Planning Standards should either be field tested and revised or else be fully discussed and voted on through the SAR process before adopting these standards for compliance.

In particular, MEC is concerned with the extraordinary cost and effort that is required by Standard 059 for generation testing. MEC urges the Drafting Team or NERC to pick out a few key 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.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

While MEC believes it is a reasonable translation, MEC is concerned about the translation of the Planning Standards as indicated in our response to Question 1. For example, the translation is based upon using different vintages of Compliance Templates resulting in standards that are somewhat uneven and inconsistent.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

MEC does not completely support either of these statements for the Planning Standards.

MEC believes that the Drafting Team has already eliminated some redundancies in the Planning Standards that should not have been eliminated. As indicated in our response to Question 1, MEC believes that in some cases the Standard language

should be added back to the Version 0 standards. In these cases, the Standard language typically provides a broader view of the purpose of the standard than is provided by the Compliance Templates. When there are clear cases of exact redundancies, MEC supports eliminating the redundancies when nothing is lost with the elimination.

On the other hand, MEC does not support minimizing change to the Planning Standards merely to simplify the process. As we indicated in our response to Question 1, we believe the Drafting Team should make an attempt to clean-up some inconsistencies within the standards particularly with regard to Non Compliance Levels and with regard to terms from the NERC Functional Model.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

MEC believes that the designation of functions from the NERC Functional Model as used in the Version 0 Planning Standards are for the most part acceptable. However, since there are several Planning Standards which require a significant effort to clean-up the functional designations, MEC urges the Drafting Team to fix these inconsistencies before putting the Version 0 standards up for balloting.

Also, there are numerous references to the Regional Reliability Council in the Version 0 Planning Standards but no reference to the Regional Reliability Organization. The Drafting Team should clarify the role of the RRO with regard to the Version 0 Standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

MEC notes that the SAR process for Standard 600 Facility Ratings, System Operating Limits, and Transfer Capabilities has resulted in standards associated with ATC component calculations as being classified as business practices. If the Drafting Team would wish to be consistent with this approach, the Drafting Team

should classify the portions of Standards 054, 055, and 056 which deal with ATC components, CBM, and TRM calculations as business practices. The portions of these standards which deal with the TTC and the reliability portion of TRM should continue as reliability standards.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

MEC does not agree with the Drafting Team's approach because some of the existing Reliability Coordinators will continue to not have all the tasks of the Reliability Authority. The Version 0 Standards must reflect the continuing presence of Reliability Coordinators in the industry until such time as the industry changes and the Reliability Coordinator Function is eliminated.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

MEC does not support adoption for compliance of field-tested Planning Standards in which significant feedback from the field testing is not incorporated in the standards. Significant comments received during field testing of Phase III Compliance Templates should be incorporated into the Version 0 standards prior

to adopting the standards for compliance. MEC does not have access to all the comments on the Phase III standards. As a result, MEC has no choice but to urge that all the Phase III Planning Standards be deleted.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

MEC does not support adoption for compliance of non-field tested Planning Standards that have not gone through the SAR process. Version 0 Phase IV Planning Standards should either be field tested and revised or else be fully discussed and voted on through the SAR process before compliance. Therefore, MEC urges that the Phase IV Planning Standards be deleted.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
ALL	Various	Various	MEC supports the detailed comments provided by MAPP in response to Question 13 with the exception of the MAPP comment on Standard 059. For brevity, MEC does not repeat the comments on the other standards here.
059	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

There needs to be more alignment with the levels of non compliance and impact on system reliability. Many of the compliance measures are based on the "paper work" being complete and not the real impact on system reliability.

Realistic data is essential for both planning and operation. However, the untested Phase IV introduces significant risks to both equipment and the power system. Other approaches that use data from natural occurring events should be used to calculate the necessary characteristics or to use existing measured extremes for studies..

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

In general I agree except for standard 061 where no translation was attempted and for specific examples identified later.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

In general I agree from a short term point of view because it was the only thing NERC had that could be used. However, some of the terms do not translate well in states like New Jersey where LSE's are really market entities and do none of the identified functions. Also, the omission of IA indicates that the model requires serious work.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

This force fitting is just another example of the weakness of the present application of the functional model.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Anything that can be solved through a market should be put into business rules.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

TRL's should be added to the list of items to be treated as business practices. Identify the reliability function that is needed and let the market provide the solution.

Standard 058 should not apply to transactions within a market area that has deliverability and the ability to purchase from the spot market.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

This is again a short term solution but should not be the final outcome.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Considering the present schedule, there is not time to debate this hole in the version 0 standards.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

The testing requirements in #59 should be clarified to include data gathering of naturally occurring events and not just expensive, intrusive, large scale testing. Bounding the MW and MVAR output from plants to what they have actually produced over some period of time may be all that is required.

While #62 is nice to have, as long as conservative models are used this is not needed at this time. The time is better spent getting the functional model complete.

#66 should be expanded to any entity that connects new control systems to the transmission system. For example, Merchant Transmission developers connecting HVDC systems need to satisfy this requirement.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007			Transmission Security during operation should conform to the applicable portions of Table 1 in the planning standards.
015			In Attachment 1, the generator data should include status of voltage control and power system stabilizer facilities.
016			Outage information is needed by neighboring reliability authorities much sooner than one day prior to the outage.
028			There needs to be a requirement on how the operating staff knows that they have lost control center functionality. Under R1, the contingency plan should address how monitoring and control of facilities will be achieved and provide a maximum time for restoration of the monitoring and control function.
029			In section R1, for all but the smallest areas, redundancy and diversely routed telecommunications is required. Identify that for a telecommunications circuit to be adequate and reliable, it must also be secure from interactions with other entities (hackers). While cyber security has been a new topic with NERC, it is not new to anyone involved in real-time operations.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
037			<p>Reliability Authorities shall coordinate their next-day analyses to assure consistent assumptions and boundary conditions (reasonable power flows on both ends of the same line).</p>
051	all		<p>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.</p>
053	Purpose		<p>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.</p>
053	S1 Requirements		<p>Add FERC and State requirements to the list of applicable agencies.</p> <p>Need a way for the TO to delegate this to their RTO. The language does not seem to provide delegation.</p>
053	S2		<p>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 project impacted the reliability of the presently planned power system.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
053	Continued		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.
058	S4	R4-1.3	The use of a conservative model is applicable.
058	S5	R5-1	Solved cases without any violations should be the basic requirement.
059	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.
060	S1		Need to provide method of using the methodology identified by the FERC approved RTO.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	Purpose		Include the third paragraph from the existing document into the new language to better define the level of data required.
061	Many	Applicability	Add the LSE and the Distribution provider to those supplying data.
061	S3		The requirements from the existing document should be included in the new language. Do not understand why no translation was attempted.
061	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.
063	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
064	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

While I have made a number of comments, I believe the team should be commended for their efforts and the amount of time I know it has taken to get this far in the process.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The New York State Reliability Council (NYSRC) supports the comments separately provided by the Northeast Power Coordinating Council (NPCC) on the Draft 1 Version 0 Reliability Standards. The comments provided by the NYSRC in this questionnaire supplements and reinforces the NPCC comments.

An improvement that must be made in the next draft in order make the Version 0 Standards acceptable is to retain the existing Planning Standards (S1, S2, etc.) in the translation. Despite the translation comments that say the standards are not used directly in the translation because their content is repeated and detailed more completely in the measurements, we find that critical requirements that are stated in the standards have not been fully translated and are omitted in Version 0. Therefore, we strongly suggest that the S1, S2, etc. language be retained in the Version 0 standards. It is imperative that the existing standards not be weakened in the translation process.

We agree with the footnote that applies to Table 1 in the Planning Standards (page 21) that says, "Any Region may implement standards that are more stringent, but not inconsistent with NERC's industry-wide standards." However, this statement should apply to ALL Version 0 standards, not just Table 1. We therefore recommend that this or a similar statement be inserted in an appropriate location to make it is clear that it applies to all Version 0 standards.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Phase III & IV Planning measurements that have not been field tested must not be included with the Version 0 standards. Also refer to our concern about the omission of many of the requirements of Planning Standards S1, S2, etc. in the translation process covered under Question 1.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Please refer to our Question 1 comments.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Although the NYSRC agrees with the need for most of the above standards, we believe that they be field tested prior to implementation. We therefore strongly recommend that the SAR process be used to implement these standards.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

See Question 11 response.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Operating Policies (General)			The business items assigned to NAESB should be included in the NERC version 0 standards. NERC should not be relying on NAESB to meet the NERC defined dates.
Operating Policies (General)			Many of the standards omit the guides. These guides provide usefull and pertinent information and should remain as part of the standsards, at least in version 0
Operating Policies (General)			Many of the introductions were deleted. The introductions serve as a short summary of the standard and should be included in version 0
Surveys Standard		R2	Old section 2.1.3 (FRS Surveys) is deleted without explanation except to say that it is contingent upon approval of Section C (Policy 1-003). This is unclear since section C defines how to determine and use the frequency bias and 2.1.3 specifies that the data needed to calculate the frequency bias is collected.
Policy 2, Section A, item 1.1		R2	The term “credible nature” is overly vague. Some clearer terms or definition must be included in version 0. Waiting for version 1 will allow months of uncertainty.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 2, Section A, 008-R4		008-R4	Reword as “The Reliability Authority shall evaluate actions taken to address an SOL or IROL violation. If the actions taken are not appropriate or sufficient, the RA shall direct actions, as required, to the TO or BA to return the system to within limits.”
Policy 2, Section A, 009-R6 (3.2) & 009-R10 (4.1)		009-R6 & 009-R10	These sections should be elaborated to address pockets of inadequate reactive reserve that are solved by an SPS after the first contingency.
Policy 4, Section A,		014-R1	Add to end of sentence “...use and generation derates”
Policy 4, Section C		016-R1	Add to end of first sentence “...as well as the local transmission system.”
Policy 4, Section B		015-R1	Reference is made to Attachment A and Appendix 4B yet they are not part of the red line standard.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 4, Section B		015-R4, Data section 5.1	Section 5.1 refers to an Addendum A, yet that is not part of the red line standard.
Policy 5, Section B		n/a	A section should be added defining the responsibilities of the generator owners, LSEs and distribution providers to notify the transmission operator of any problems that could impact the transmission system.
Policy 5, Section D		Introduction item 1.1	Replace “Operating Authorities” with “Reliability Authority and Transmission Operator”
Policy 5, Section E		Introduction	The term Operating Authority is obsolete.
Policy 5, Section E, Section F & Section G		General	Replace “System Operators” with “Transmission Operators”

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 6, Section A		024-R4	The LSE, TSP and GOP should coordinate with their host Transmission Operator who will be the interface with the BA.
Policy 6, Section D		027-R1, R2, R3	I disagree with the note to delete the second paragraph of the introduction. The first two sentences of the paragraph are not covered in requirements 3 and 4 as stated.
Policy 7, Section A		First Paragraph	What does this mean? The first part is not a sentence and the second part is a comment. Also, provide “appendix 7A”
Policy 7, Section A-D		General	This standard has a number of comments and questions in the red line document. It is impossible to adequately review the document when it is clearly incomplete.
General		Measures	In many cases the measures have been removed. For version 0 they should be retained for clarity. An example is old policy 8A (new standard 30). The red line standard is one sentence. The measures give the details.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 8, Section A		030-M1	State the details that are to be included in the control room job description document

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

To allow an easier review of the draft standards, we suggest that Draft 2 include the standard number and title in a header or footer on every page .

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The Drafting Team translated the Planning Standards to a Version 0 draft in a consistent manner and generally maintained the criteria of the previous Planning Standards. However, the Operating Policy translation was not as consistent as the Planning Standards translation.

Regarding the operating practices related standards translation, we are concerned that there is too much of the detail in the Appendices has been left out of the corresponding Version 0 standards. Tag Approvals, Denials, and Corrections, which have been left up to NAESB to address, have direct impact on Reliability. Close coordination between NERC and NAESB is needed in developing companion Version 0 standards because of serious reliability implications in this area.

We support the Version 0 Standards process. Once a complete and accurate translation is made of all existing Planning Standards and Operating Policies, we will vote to approve them.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

There are no "show stoppers" in the approach, just in the results as they stand now. As stated above in response to Question 1, we believe there are existing requirements in the current Operating Policies that have not been translated into standard. Once those requirements are included, we see no other "show stoppers."

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

No, the Version 0 standards do not go far enough into details. These new standards are more like conceptual guidelines, but without the detail in Operating Policies, which has been developed over the past 30 years, we will be taking a step backwards in the reliability of the electric system.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

While it may be tempting to re-organize and simplify, for better understanding of the industry it is not recommended to 'improve' or correct 'redundancies' of the previous Standards in the new Version 0. This should be considered in the next version. In general, we agree with translation of the Planning Standards, however, translation of Operating Policies is a concern as commented above.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

We disagree with the Drafting Team's recommendation that the BA be designated to perform the current CA scheduling functions. We believe that if the IA is not going to be implemented at this time, then the next most appropriate new Functional Model entity that must perform this function would be the Transmission Service Provider, not the BA. We believe that this proposal will result in a smooth transition from today's CA to CA scheduling, which is traditionally has been administered by the transmission side of most vertically integrated utilities.

We concur with the designation of all other functions.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

It would be better to identify the other functions for the specific requirements when possible to minimize the risk of miscommunication or confusion of roles and responsibilities in the future.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

With respect to policy 1d and 1f, we agree. However, we believe that Tagging procedures have an impact on reliability and need to be kept in the operating policies or closely coordinated with the NAESB process.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Appendices 9C1, 9C1B and 9C1C should be considered as both NAESB version 0 business practices and NERC version 0 reliability standards. The language in both NERC and NAESB standards should be the same. Additionally, NERC and NAESB should immediately establish a collaborative team to separate the reliability elements from the business practices to create separate organizational version 1 reliability standards and business practices standards and retire these version 0 standards ASAP.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

We disagree with the Drafting Team's recommendation that the current “control area” scheduling method be retained in the Version 0 standards and that the Balancing Authority be designated to perform the current control area balancing functions, including scheduling. We believe the appropriate Functional Model entity to designate would be the Transmission Service Provider not the Balancing Authority. Further, today we have Control Area to Control Area scheduling, not BA to BA as stated in the question.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Need to resolve between Paul and Navin's comments????????????????

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

It appears that there might be a typo in the question - "Phase 3 in the last line above meant Phase 4? Also, it is not clear whether they intended to include the standards that were not field-tested into Version 0.

I.F.M5 - Use of disturbance monitoring equipment data to develop, maintain and enhance steady state, dynamics and generator performance modeling: This effort should be done only for major system disturbances and the effort must be done at Region/multi-Region or NERC level. The deficiency of I.F.M5 is that it requires the Regional members to carry out this effort. It will be impractical, and perhaps impossible, for the Regional members to carry out such efforts alone without having Regions and/or NERC involved, and difficult to measure its compliance.

II.E.M1, M2 and M3 deal with development of dynamic modeling from load component data provided by Load Serving Entities. This is an extremely intricate effort. Also, such modeling is required only in special system dynamics studies, which are rare. When such special studies are required, usually reasonable modeling can be derived, based on generic information on load composition in the areas of study interest. Therefore, a comprehensive load modeling development effort, proposed by M1, M2 and M3, is not commensurate with its usage (which is rare).

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
054, 055, 056	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.
057	5 1	M5-1 I.F.M1	Delete proposed Measure; not measurable. 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.)
058	3	R3-1 and R3-2	R3-1 references 'reporting procedures of Reliability Standard 058-R4'. this should reference the specific Measure 058-R4-1. Similar improper reference for R3-2. Levels of Non Compliance (Levels 1 and 3) should also properly reference.
058	6	R6-1	Requirement has incorrect reference to IIA.M5, should reference Reliability Standard 058-R5-1
059	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
060	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.
061	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.
061	Standard Applicability		Improper standard reference, need Version 0 Standard references.
061	3		Requirement not measurable, delete section.
061	7	R7-1	change "shall be made known" to "shall make known". Similar change required in Measures.
062	1		Should be applicable to the Planning Authorities and the transmission planner.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	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
069	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.
See attached spreadsheet for more comments. on this question.	See attached spreadsheet for more comments.	See attached spreadsheet for more comments.	See attached spreadsheet for more comments on this question.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

This is a good first start at the translation of the existing Planning Standards and Operating Policies. The Drafting Team is to be commended on their hard work in such a short time.

We are undecided as to what should happen with Appendix 9C1, Appendix 9C1B, Appendix 9C1C, Appendix 9C2, and Appendix 9C3 which deal with interconnection-wide relief procedures. As stated by the Drafting Team in Q7, "the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of 'no changes to the reliability rules in Version 0.'" However, to totally hand-off these appendices to NASEB as business practices is not appropriate either. Version 0 is incomplete and operationally not possible without the accompanying Policy 9 Appendices. I would suggest that these appendices must remain and be a part of Version 0. After Version 0 is adopted, then NERC and NASEB should work together to separate the reliability and business practice components of the appendices, adopting new standards for the reliability pieces via the standards process and handing the business practices piece over to NASEB.

Standard #	Section # (Planning Only)	Requirement or Measure #
9		R11
15		R4
18		R3
18		
19		R2
20		R2
20		R5
24		R1
24		R18
25		R3
25		R5
28		Purpose
28		Requirements
28		
29		R3
29		
31		R1
33		R1
33		R6

35 R1

37 R7 & R8
38 R7

38 R8

39 R7

010 R1

010 R1

010 R1

010 R1

010 R1

010 R1

010 R2

010 R2

010 R2

011 purpose

011 R1

011 R3

012	R1
012	R2
012	R2

013	R1
-----	----

013	R1
-----	----

013	R2
-----	----

013	R3
-----	----

ALL

MISSING FROM VERSION 0

MISSING FROM VERSION 0

MISSING FROM VERSION 0

Policy 3A	1.3
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Policy 3A	1.4
-----------	-----

Policy 3A	2.3
-----------	-----

Policy 3A	2.5
-----------	-----

Policy 3A	2.0
-----------	-----

Policy 3A	2.0
-----------	-----

Policy 3A	3.0
Policy 3A	4.0
Policy 3A	6.0

Policy 3A	7.0
-----------	-----

Policy 3A	introduction
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Policy 3B	3.0
Policy 3B	4.1.1

Policy 3B	4.1.2
Policy 3B	5
Policy 3C	4.0
Policy 3D	1.0

Comments

Policy 2B R6 today states that devices used to regulate transmission voltage and reactive flow shall be available. There is no Addendum A. The last sentence should read Attachment 1.

Agree with translation of Operating Authority including the Generator Operator, and stating that

"Generator Operator shall comply with Transmission Operator reliability directives."

Omitted Policy 5A - R3, R7, R8, R9, R10 and R12 from this standard.

Omitted conditions that require notification.

This should be an RA to BA notification process, which is not clearly defined in this standard.

Balancing Authority cannot shed load. This needs to have some wording that indicates that the BA would direct the appropriate entities to shed load.

OPERATING AUTHORITY replaced with RELIABILITY AUTHORITY, BALANCING AUTHORITY, TRANSMISSION OPERATOR, and GENERATOR OPERATOR. Original definition of OPERATING AUTHORITY in Policy 5 stated it didn't include Reliability Coordinators. Should RELIABILITY AUTHORITY be deleted since Policy 9 handles RC functions and these were translated to standards 33-40?

R18 only needs to state that the BALANCING AUTHORITIES shall, without any intentional time delay, communicate the information described in the requirement R15 above to their RELIABILITY AUTHORITY, or add such statement to R15. R17 already requires notification to the RA, and these were the activities that Policy today requires notification to the RA, as referenced in Policy 6A R6.1 - 6.5.

"BALANCING AUTHORITY" in markup removed from matrix and not required to have emergency load reduction plan for IROLs. Why was the BA removed from this requirement?

Compliance Template P6 T1 states "The Capacity and Energy Emergency Plan must address the following requirements" but goes on to clarify that "Some of the items may not be applicable, as the responsibilities for the item may not rest with the entity being reviewed, and therefore, they should not be penalized for not having that item in the plan." Some of the "13" items in P6 T1 may be more cost effective than others. We need to have the ability to pick the most cost effective solution(s)! The "Plans" should include the 13 items from the compliance template, but that should not mean you must do each of these items during an event. Solutions to Emergencies and Capacity Deficiency events are not a one size fits all. The operator needs a host of options to choose from.

Description is not a complete sentence. Markup document has BALANCING AUTHORITIES, TRANSMISSION OPERATORS, and RELIABILITY AUTHORITIES shall have a plan to continue reliability operations in the event its control center becomes inoperable.

4th bullet item has "AREAS". P6 T3 uses the term "control areas."

Matrix uses template P6 T2 as a reference. It should reference template P6 T3.

Need definition of Areas and Regions

Reference should be to Policy 5B-R1, not 5A-R1.

Attachment 1 to describe elements to be included in the training program is missing.

OK. For reference, this is taken from Section C of "Introduction to the Operating Policies."

This is not a correct translation of Policy 9 B R3. The Policy says that the entity that has been delegated a reliability coordinator task must ensure that the tasks are carried out by NERC Certified Reliability Coordinator operators and that they, the delegated entity, will have those delegated tasks audited under the NERC RC audit program. Thus, the "cop" is NERC and/or the Regions and the burden is on the delegated entity. Version 0 standard 033 R6 places the burden of verification on the Reliability Authority and makes him the "cop" as opposed to NERC/Regions. When the RCWG and ORS re-wrote Policy 9, they were very careful to ensure that NERC/Regions remained the "reliability standards police." The wording 033 R6 should be revised to maintain this important concept.

Change "The RELIABILITY AUTHORITY shall monitor all BULK ELECTRIC SYSTEM facilities, including sub-transmission information, within its RELIABILITY AUTHORITY AREA . . ." to "The RELIABILITY AUTHORITY shall monitor all BULK ELECTRIC SYSTEM facilities, and sub-transmission information, within its RELIABILITY AUTHORITY AREA . . ." The "including sub-transmission" phrase implies that sub-transmission facilities is a subset of Bulk Electric System facilities, which is not always true.

Standard 037 skips R7 and R8. Is this just a numbering error?

This contains a new requirement not found in current Policy and thus should be modified. Existing Policy 9 E Requirement 1.4.5 does not state that only a Reliability Coordinator can be the Interconnection Time Monitor, thus R7 should have such statement removed. It should only state: "Only the INTERCONNECTION TIME MONITOR shall be able to modify scheduled Interconnection frequency to implement a time error correction." The NERC OC presently approves the selection of the Interconnection Time Monitor based upon the ORS's recommendation. If it is desired to change Policy such that only an RA can perform this function, then such change should go through the Standards Process.

The interpretation of the Team places an added burden on the RA in that R8 requires them to notify the generation operators regarding GMD events. Today, the RC notifies the Control Areas, which notify the generation operators. Would not a better translation to the Functional Model have the RA notify the Transmission Operators and Balancing Authorities and let the Balancing Authorities notify the generation operators?

What is the correct reference for this requirement? You list Policy 9F Requirement 4 but that is incorrect. I can not find the R7 requirement as worded anywhere in existing Policy and thus recommend R7 be deleted.

The reference indicates that this is from 3A section 2.1 of the Policy. It is from section 1.2

R1 says the load PSE is responsible for tagging. Policy says the load PSE is responsible for providing the tag with the caveat that any PSE may provide the tag, but the load PSE is responsible for ensuring that a single tag is provided. R1 is changing the requirements.

In the markup version of the policy, CA has been replaced with BA, TP has been replaced with TSP. Are these exact equivalents?

Purpose of 010 indicates that "certain" transactions are tagged in adequate time. This makes it sound like it is the exception rather than the rule to tag in adequate time.

Policy says that Dynamic Interchange Schedules should be tagged (doesn't say who has to do it). R1 and R4 says that the Load PSE is responsible. This is a new restriction.

Current Policy indicates that bilateral payback should be tagged. The Reliability Standard places this requirement on the Sink BA. This is a new requirement.

The note about a change in the hourly energy profile of 25% requiring a revised tag has been dropped without explanation.

Policy says that "If a PSE is not involved in the Transaction, such as delivery from a jointly owned generator...". R2 takes this "such as" and makes it the only situation in which a BA would tag. This is a new restriction.

The exemption from tagging for 60 minutes now includes the words "regardless of magnitude or duration". Why has this addition been made?

The purpose states that all affected Reliability Entities will assess the reliability impacts before approving or denying the tag. Currently, Reliability Authorities have nothing to do with approval or denial of tags. They assess AFTER the tags have been approved and confirmed. To put the Reliability Authorities in the position of approving and denying tags would require a restructuring of the entire tagging process. The Markup Policy differs from the Current Policy regarding who the complete tag must be provided to. Cannot adequately evaluate the Reliability Standard because the Markup is misleading. Current Policy allows for the PSE or LSE to defer approval to the Host Control Area. This allowance has been dropped.

Current Policy indicates that the sending and receiving CAs should agree "before making generation changes". The Reliability Standards change this to "prior to implementation in their ACE equation...". This unannounced change should be carefully reviewed.

Should include a cross reference to Policy 3C 2.0 on ramp start time.

Should include a cross reference to Policy 3C 3.0 on ramps duration.

Should include a cross reference to Policy 3C 3.4 on DCS.

Should also be a cross reference to Policy 3B 4.1.3 on DC ties.

The reference is incorrect. It should be to Policy 3B section 1

The Current Policy says that a tag may be modified for a reliability related issue. The Reliability Standard says that a new limit may be set. The Reliability Standard is wrong in assuming that the only modification would be by setting a new limit.

This tag modification section is said to apply to loss of generation, loss of load, or regional congestion management. Why isn't there an allowance for modifying tags due to a local congestion management issue as in Policy 3D 2.2.1?

Current Policy 3D 2.3 assigns the responsibility during loss of generation to the Source CA. The Reliability Standard assigns all responsibilities to the Sink BA. This is a change that should be thoroughly discussed. Releasing a tag limit imposed by a reliability event may not necessarily reload the tag. There may be other reliability events which prevent the reload. Also, why is the Reliability Authority not informed of this ReLoad?

Note that the Markup version of the Policy provided doesn't match the Policy currently in use. Certain terms have been replaced (CA by BA, TP by TSP), footnotes have been dropped (e.g. Footnote 1 on the first page of the current Policy 3), and some sections changed without explanation (Policy 3A Section 2.2). As a result, I have no confidence that the Markup Policy can be trusted as a true representation of Current Policy.

Policy 9C R1.4: Operating under known conditions. I believe this to be a significant omission. 9C R1.4 requires the RA to ensure that Transmission Operators always operate under known and studied conditions. This was added to Policy after the August 14 Blackout and needs to remain.

Policy 9C R1.2: Determining IROLs. The Version 0 Standards state that the RA must determine IROLs. But, what is missing is the piece from 9C R1.2 that states "determine IROLs based on local, regional, and interregional studies." This is a minor omission in my opinion.

Policy 9J R1.3: Standards of Conduct. I believe this to be a significant omission. 9J R1.3 requires the RA to sign and adhere to the NERC Reliability Coordinator Standards of Conduct, as listed in the NERC Operating Manual. One could argue that the RA certification standards will address this issue, which is true. However, the RA certification standards have not been approved nor implemented. Thus, correct conversion of existing Policy would require inclusion of 9J R1.3 at this time. When the RA certification standards are approved, they would replace this provision in the Version 0 standards.

Policy 3A.1.3 - Requiring contact personnel is a serious reliability issue and should be included in the standard.

Policy 3A 1.4 - Receiving information about the change in a tags status is a serious reliability issue and should be included in the standard. What will happen if the responsible party is 9-5 only and the tag has to be curtailed?

Policy 3A 2.3 is highlighted to show that the tag format will be a NAESB issue. But 2.3.1 is highlighted to indicate that tags crossing interconnection boundaries are a Reliability Issue. These two things are inconsistent. They should both be Reliability concerns.

The confirmation of tag receipt should not be left to a business practice. If the PSE is not assured that other entities received the tag, this may cause reliability issues.

Policy 3A 2.0 - requires adherence to Etag Spec. The Reliability Standards do not mention Etag spec. This is a dropped requirement.

The Policy Markup says the tag is the official request from the load-serving PSE to the Sink BA. The Current Policy says the tag is the official request from the PSE to the Control Areas (plural). This is a change in the requirements.

The Markup Policy drops the requirement for specifically verifying with all Control Areas on the scheduling path. This may or may not be a problem depending on the role of the Balancing Authority.

The Markup Policy drops reference to Generation Providing Entities.

This section has been dropped from the Reliability Standards

This section has been highlighted as being a NAESB issue, but there are serious reliability implications for having a consistent practice for what to do with a tag after a curtailment has ended. The "default" action should be included in the Reliability Standard.

Policy 3 makes a distinction (in footnote 1) between Interchange Transactions and Transactions (which can be entirely within a CA). This distinction is dropped in the Reliability Standards without explanation.

The Policy indicates that information regarding the interchange transaction tag should be provided to the RA electronically. The "electronically" requirement has been dropped in the standards and will create a serious problem with adequately communicating the information.

The requirement to adhere to Interchange Schedule standards has been dropped

The requirement that Control Areas must operate such that schedules do not knowingly cause harm has been dropped. There is a note in the Markup Policy about it being the TPs responsibility, but there is no reference to where this responsibility is stated.

This section on Maximum Scheduled Interchange has been dropped from the Reliability Standards

The Current Policy requirement to use block accounting has been dropped.

This section on Market Related modifications has been dropped from the Reliability Standards.

ailable under the direction of the System Operator. It does not state anything about establishing authority

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

At this time there are no show stoppers.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

The redundancies should be eliminated if possible, while keeping in mind that these improvements could cause a delay in obtaining NERC BOT approval.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

I don't believe that the drafting team should assume that the reliability functions are addressed in the service agreements.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

A number of organizations are closely watching the development of Version 0 Standards. Any attempt to eliminate current measures may appear as an attempt to reduce reliability by the Industry. Correcting any flaws in the Standards should be achieved in the development of Version 1 Standards either through the normal or emergency SAR process. Particular compliance with tested but not revised Phase 3 and untested Phase 4 Planning standards should include some flexibility and forgiveness during the transition from Version 0 to Version 1.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

See comments under Question 11.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

NERC planning standard compliance template (most recent revision) were not with the planning standard. They are hidden.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name: Alex Lau					
Organization: Southwest Power Pool					
Telephone: 501-6143339					
Email: alau@spp.org					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: SPP Transmission Working Group					
Lead Contact Ronnie Frizzell			Organization: Arkansas Electric		
Cooperative Corporation					
Telephone: (501)5702433			Email: rfrizzell@aecc.com		
Member Names	Organization	Segment	Member Names	Organization	Segment
Ronnie Frizzell	Arkansas Electric Cooperative Corp	4	Don Taylor	Westar Energy, Inc	1
Noman Williams	Sunflower Electric Power Corporation	1	Jim Useldinger	Kansas City Power & Light	1
Howard Conus	City Utilities of Springfield,MO	1	Matt McGee	American Electric Power	1
Phil Crissup	OG+E Electric Services	1	Mitch Wiliams	Western Farmers Electric Cooperative	1
John Fulton	Southwestern Public Service	1	John Chiles	East Texas Electric Cooperative	4

Sam McGarrah	Empire District Electric Company	1	David Sargent	Southwestern Power Administration	1
Alex Lau	Southwest Power Pool	2	Alan Myers	Aquila Networks	1

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Acceptable improvements should include revisions to several standards/measurements & elimination of several others. It is important that the drafting team does not change the existing planning standards. All of the planning standard guides were discarded.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

There are no "show stoppers".

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

No comment.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

No comment.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

As a whole, the drafting team did a good job designating the functions. However, the incorporation of the Functional Model definitions poses a problem. Since this is the first application of the Functional Model definitions, it is apparent that some of the definitions need help. Given the struggle the drafting team had with determining which functions and entities should be assigned responsible for the standards based on the existing definitions, either new/additional definitions need to be developed or existing definitions need to be expanded. It is recognized that this is beyond the scope of the Version 0 drafting effort; however NERC should not lose sight of this important issue. Ensuring appropriate assignment of responsibility for each standard is fundamentally necessary. The assignments not only have to correctly identify who is responsible for a given standard but the assignment MUST completely encompass all appropriate industry participants. The concern is that the Functional Model definitions do not adequately provide a clear assignment to be made in some cases. A hypothetical example is; If an entity, based on the Functional Model definitions makes a determination of which functions and entity responsibilities will apply or affect the entity, Once determined, the entity then uses its list solely in determining which standards affect the entity. If the standard does not clearly identify ALL possible participants that should meet the standard, the entity in question may assume the standard does not apply because the entity doesn't meet the Functional Model definition. If this occurs there will not only be problems with compliance but more importantly the entire purpose of standards becomes null and void because some industry participants that should be meeting the standards are not..

Recommendation: Allow the drafting team to provide language for consideration to clarify and/or expand existing definitions and any new definitions the team feels may be needed. OR Do not limit the drafting team to using only the definitions in the Functional Model. If this is done the drafting team must provide a clear definition of any terms used that are not in the Functional Model.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous

extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

SPP Operating Reliability Working Group (ORWG) will provide comments.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

SPP Operating Reliability Working Group (ORWG) will provide comments.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No comment.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

SPP Operating Reliability Working Group (ORWG) will provide comments.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Version 0 is suppose to be only a reformat of the existing standards.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Comments detailed in Question 13.

Some of these standards do not represent a simple translation from the planning standards and the change alters to whom this measure/standard is applicable.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
53	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
55	1.E.2	M4	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.
56	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.
57	1.F	M1,M5	Standard 057 - I.F.M1 should be revised because it does not 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.
62	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
63	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
65	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. 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.
68	III.E	M1,M2,M5	The approval dates for M1, M2, and M5 are in error. "October 9, 2000" is the correct date.
69	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

NERC planning standard compliance template (most recent revision) were not with the planning standard. They are hidden.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:		Roman Carter			
Organization:		Southern Co. Generation & Energy Marketing			
Telephone:		205.257.6027			
Email:		jrcarter@southernco.com			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments		Group Name: Southern Co. Generation & Energy Marketing			
Lead Contact Roman Carter		Organization: Southern Co. Generation & Energy Marketing, SCGEM			
Telephone: 205.257.6027		Email: jrcarter@southernco.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Roman Carter	SCGEM	6			
Lucius Burris	SCGEM	6			
Clifford Shepard	SCGEM	6			
Lloyd Barnes	SCGEM	6			
Roger Green	Southern Gen.	5			
Joel Dison	SCGEM	6			
Tony Reed	SCGEM	6			
Tom Higgins	Southern Generation	5			
Terry Crawley	Southern Nuclear	5			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As stated in the opening sentence, you are asking for approval based on the V-0 Standard as presented. As presented, major changes are necessary and the improvements are requested to be shown in draft 2 of the Version 0 Standard before we will vote in favor of this Standard.

For example, phase III and phase IV Planning Standards are included in this draft of Version 0. Phase IV Standards have not been field tested and some of the Phase III were field tested but were rejected.

Additionally, there are numerous other areas within the Standard where the translation between original Policy and this Standard are in error.

In general, we support the overall effort to convert policy to standard but strongly urge the drafting team to consider the changes included within this comment form.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

**Phase III and Phase IV Planning Standards
Standard 24, Requirement 10**

Interpretation of which entities are considered Operating Authorities

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

See comments on question #2.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

These type changes should be addressed in Version 1. The goal in Version 0 is to interpret Policy whether or not it is duplicated in other areas of Policy.

Any apparent changes should be well documented and explained as to the purpose and the reason for the changes.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

It is unclear whether the question is asking for acceptance of the Functional Model or whether the Functional Model functions were properly applied to this Standard.

Assuming the latter is true, we have concerns about the translation of the Operating Authorities into this Standard.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

In Policy 5, there is a definition for Operating Authority and includes entities such as Control Areas (BA, TO) and Generator Operator. It specifically excludes the Reliability Coordinator but throughout this Standard, the V-0 DT has substituted Reliability Authority for Reliability Coordinator. If the RA is substituted for the RC, then the RA cannot be included as one of the entities known as an Operating Authority since RC's are excluded as an Operating Authority.

Also, the entities described as the OA according to Policy 5 do not include LSE, PSE, or TSP.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The list above does not include all business practices that should be developed by NAESB in their V-0 Standard.

The OC subcommittees provided significant input to the drafting team regarding business practices contained in existing NERC policies. We recommend the V-0 drafting team reconsider those items to be assigned to NAESB for development.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Policy 9, Appendix 9C1, 9C1B, and 9C1C (TLR and Reallocation procedures) are predominantly business practices. NERC should consider extracting the reliability components from the TLR procedures and encourage NAESB to develop the appropriate business practices.

The ACE equation special cases in Policy 1 Appendix 1D. The RS identified these as business practices that should be removed from Policy. NAESB should develop them as business practice Standard.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

There were a significant number of comments recommending numerous "fixes" to the III.C standards/measurements when they were field tested. These comments have not yet been addressed, and, therefore should not be included in Version 0. The Standards should be considered in a SAR for Version 1 with adequate representation from the Generator segment.

However, if any of the III.C measurements are included in Version 0, there should be some guarantee (RBB approval) that industry comments from the field test should be incorporated in the final version before full implementation.

In addition to the III.C standards, additional operating requirements have been introduced that cover the same or related issues as in the Planning Standards and should also be eliminated from version 0. The subject areas are Standard 9, R8; Standard 16, R2; and Standard 24, R15.

Bd of Trustees adopted the Phase III Standards but this does not mean Industry accepts them. The only way to guarantee that Industry accepts them is for the RBB to be allowed to approve them prior to Board adoption.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

No Phase IV Planning Standards should be included in Version 0. The sections related to generating plants needs to be reviewed and re-written with input from Generator Owners/Operators to insure the requirements are reasonable and can be implemented by

generators. The benefit versus risk issue with reactive, regulator and governor testing are of primary concerns. EEI has documented that several unit trips have occurred while performing some of these tests. It is suggested that each region address these topics jointly between planners, system operators and generation owners to better define the impact and practicality of the subject testings or if other methods could be used to validate generator, excitation and governor data.

In addition to the Planning standards listed above, several additional operating requirements have been introduced that cover the same or related issues and should also be eliminated from version 0. The subject areas are OC Standard 9, R8; and Standard 24, R15.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		2	The requirement states "A TO shall, when practical, operate....". This is not an active enforceable requirement. What is practical for some is not for others. If it is needed as a requirement, then the wording should be changed.
009		5	The requirement states "The TO, if necessary, shall..." This is not an active enforceable requirement. What is necessary for one is not for another. If it is needed as a requirement, then the wording should be changed.
09		11	The requirement states " The TO shall establish authority to direct.....". How do you establish authority and is this what the requirement really is meant to say?
010		2	The requirement left out an important point contained within Policy 3 section A 1.2 under note 2.-"If a PSE is not involved in the Transaction, such as delivery from a jointly owned generator, then the Sink BA is responsible for providing the tag". This requirement should be added to Standard 10
024		10	This requirement includes the following "All Generator Operators shall operate their plant(s) so as to adhere to ramp schedules." It should be pointed out that ramping requirements are viewed on a BA level and many individual Generators are not capable of adhering to a ramp schedule associated with a particular transaction, e.g. 10 minute ramp in the Eastern Interconnect. Generators should have agreements with BAs to assist.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		4	The V-0 DT asked for comments on modifications to dynamic schedules. It is recommended that for transactions =<100 mw, deviations of 10mw or less should not require modifications to the tag. For transactions > 100 mw, modifications to a tag should only be required for deviations greater than 25%.
016		1	The requirement states the GO and TO provide outage information daily to their RA. Standard 14, Req. 1 says the GO informs the host BA and TO of all generation resources available for use. It seems these two should agree to make channels of communication clear.
018		1	This req. states "The RA, BA, and TO shall have the responsibility...". The original language in Policy 5 for this requirement uses Operating Authority and this includes entities such as the GO, TO, and BA but not the Reliability Coordinator. Throughout this V-0 Standard the RA is substituted for the RC even within this requirement. Since the original policy says RCs are excluded, this poses a conflict for this requirement. This is also in Req's 2,4,5.
20			The procedure for raising priority level from bucket 6 to 7 in Policy 5, Section C.3. appears to be missing. If this is a business practice, NERC should notify NAESB.
019		1	R equirement states the GO shall have communications (voice and data links) to the RA. Does this mean the GO will be required to have Communication equipment?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		4,5	Requirement says LSE, TSP, and GO coordinate with BA (where confidentiality agreements allow). Under the F.M., the BA can delegate certain tasks that prevent the BA from meeting the Conf. Agreement in order for the BA to meet the obligations of the BA. Version-0 Standard should recognize this ability.
024		15,17,18	Requirement states without intentional delay. How is this enforceable? The burden of proof is with the enforcement organization.
025		5	It is not recommended that the additional elements be included. Original Policy had them only as Guides and they should stay as Guides. Also they have not been approved to be requirements (except by Board Adoption as part of a template) by Reg. Ballot Body.
037		5	States that the BA and GO's must sign Confidentiality Agreements. Is this in current Policy?
013		1	Should have the TO vs. TSP in the requirement.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
033		3,8	These requirements are including the LSE and PSE as entities which qualify as Operating Authorities. Original Policy stated Operating Authority as entities such as Control Areas (BA, TO) and GO's. Has policy changed to include the PSE or LSE?
038		15	Same as above in Standard 033.
037		9	Requirement uses the term "as deemed appropriate". This is subjective and can be viewed differently by Industry participants. How do you enforce?
001			Some references throughout the Standard do not seem to correctly correspond to the right Policy sections. It is recommended that all references be checked for accuracy to be sure they point back to the correct Policy.
011		2	Bullet 4 should say "OASIS reservation accomodates ALL Interchange Transactions" vs. multiple Interchange Transactions.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
026		4	It does not appear that Policy 6C 1.2, and 1.2.1 were adequately replicated into V-0 Standard. It is recommended that the two sections be copied exactly as written and included as requirement 4.
34,15		3,3	<p>Policy states information should be exchanged through a secure network, via the ISN.</p> <p>SDX, Tagging, etc. should also be an acceptable means or other prevailing NERC sponsored exchange mechanism for a required type of operational data.</p>
018		3	Market Operator should be included in the list of entities that shall comply with the RA directives. This also means that the MO would have to be added as an entity that would be included under the Operating Authority category.
021		1	The original Policy said the Operating Authority shall take immediate steps to relieve condition. V-0 Standard now states the RA and the TO shall be responsible. The original Policy included Operating Authority entities such as the BA; however V-0 Standard does not include the BA, it is recommended the BA be included.
022		3	Original Policy stated that the OA who is responsible for investigating incidents submit a preliminary report. OA could mean any one of several entities. Therefore, it is suggesting the entity with the highest responsibility for reliability submit the report, i.e., the RA.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
035		1	The original policy says the RC shall monitor all Bulk Electric System facilities within its RC area, etc. However, under the V-0 Std the words "including sub-transmission information" was added. This appears to be a new requirement and, thus, a Policy change which is not appropriate under V-0. The phrase in quotes above should be removed. The original policy had the RC MAY require sub-transmission info be received. Big difference.
038		7	This requirement does not appear to come directly from Policy 9E 1.4.5 as the Standard says. The requirement is not the same as original Policy.
039		7	It appears that the V-0 team used Policy 9F from an earlier version for developing this requirement. When comparing requirement 7 to Policy 9 posted on the NERC website which was approved on June 15, 2004, they do not match. Does the V-0 need to revise this requirement to match the most current Policy or make this Standard dependent on a version of Policy that is no longer applicable, which is what has taken place here.
018		General	Policy 5A 1. was not included in the V-0 Standard. It states " The RA and TO shall operate within the IROLs and SOLs". Appears it was overlooked.
10		1	The first sentence in the requirement should say "The load-serving PSE shall be responsible for tagging all Interchange Transactions except for those identified as being required by the Sink BA". The second sentence should pick up here and say "These Interchange Transactions (those that are between BA areas) shall include all transfers that are....etc." Otherwise, Requirement 3 of this Std 10 conflicts with Req. 1

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
11		4	There is not a requirement 4. However, there is a requirement 3 and 5. It needs renumbering.
13		5	It only includes BA having the authority to modify a tag for reliability reasons. This does not match Requirement 1 of Std 13 which says the RA, TSP, Source and Sink BA are allowed to make reliability modifications. The PSE can be removed since it would modify only market related changes which is covered under NAESB.
024		14	The requirement says that the Gen. Operator shall perform tests at the request of the RA, TO, and BA. It is recommended that the GO test at the request of the RA only. If the BA and TO request testing, they should forward their request and ask the RA to officially contact the GO for the test.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Redundancies will increase ambiguity, so organize as efficiently and concisely as possible.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

There is an element of redundancy in having a measure for voltage regulation (M4) and for excitation systems (M6). An exciter is just one of the components of voltage regulation. I suggest consolidating these two items to create one requirement for voltage regulation.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
51			Change the term "NERC Region" to "Regional Reliability Council".
51	2	M2-2	Change to read, "The Planning Authority...its reliability assessments and corrective plans per Standard 051 R2-3".
51	3	M3-2	Change to read, "The Planning Authority...its reliability assessments and corrective plans per Standard 051 R3-3".
51	4	M4-1	Change to read, "The Planning Authority...the system responses per Standard 051 R4-1".
51	4	M4-2	Change to read, "The Planning Authority...its reliability assessments per Standard 051 R4-2".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
54			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.
54	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.
54	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 2/10
54	R1-1-f		Change the word "customer" to "native load".
54	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”.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
54	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.”
54	R3-1		Change "on how" to "by which".
55	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.
55	R3-1		CBM is only an import quantity. The text of 55-R3-1 and 55-R3-2 should be changed to reflect this.
55	2		Change "Load Service Entity" to "Load Serving Entity".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
55	1	1-c	Change "...units within..." to "...units which affect deliveries into or within..."
55	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."
55	2	1-c	Remove the words "same" and "also" in the second sentence to eliminate unnecessary words.
55	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."
58	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
58	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.
58	6	M6	Same comment as above for M5.
61			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
61			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”.
61	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 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

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
68			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.”
68			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).
68			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
68	1	1	Change to read, “automatic load resotoration (see Standard RS 071)”.
68	1	2	Should read “...and NERC within five business days of a request.” to be consistent.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
68	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.
68	2	1	Start with "Each" instead of "The".
68	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."
68	2		Measures are not labeled with M1 and M2. The second measure should delete "to NERC".
68	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".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
68	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.
68	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).
68	3	1	Should read "...shall include in its technical assessment the elements identified..."
68	4	1-a	Change to read, "Under voltage load shedding system identification which shall include..."
68	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
68	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.
68	5	2	Replace “of undervoltage load shedding operations, misoperations, and failures to operate” with “as specified in R5-1” to be consistent.
68	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.
68	5	M1	Change to read, “...and failures to operate conforms to the requirements specified in 069-R5-1”.
68	5	2	Delete “undervoltage load shedding operations, misoperations, and failures to operate” to be consistent.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

General Comments

- **The term, “shall have evidence of compliance” is ambiguous. The precise nature of the evidence needs to be stated. If the intended meaning is that the reporting entity should keep copies of written documentary evidence on file to be provided upon request, it should be so stated. Alternatively, if having a person available who witnessed the entity’s compliance is sufficient, it should be so stated. Further, to whom the evidence must be provided must be stated in the standard.**
- **The term, “on an annual basis”, should be changed to “on at least an annual basis”, in every instance of its use, if that is what is intended.**
- **The term “customer” should be changed to “transmission user”.**
- **The term “transmission system user” should be changed to “transmission user”.**
- **The term “DSM programs” should be changed to “DSM measures”.**
- **The terms “first month” and “first year” are ambiguous. They could mean “current year”, “current calendar year”, “first year after the calendar year”, “rolling 12-month period”, etc.**
- **Thirty days is too long to present evidence of compliance. Some of the documentation can be prepared within these thirty days. Suggest five (or no more than 10) business days.**
- **The boxes labeled, “Compliance Monitoring Process” in each section have no context. The labeling in the existing document is clear, so the labeling should be transferred or the new language needs to include timeframe and responsibility.**
- **Make consistent use of the term, “Responsible Entity” in the Applicability part of each section. Define according to each section. Use this term in the Requirements and Measures areas instead of repeating the entire definition of what the responsible entity is for that section.**
- **Under the Measures part of each Section, use the reference to the Requirement specified consistently (i.e. 068-R2-1 vs. Reliability Standard 068-R2-1).**
- **Use sub-point numbering or bullets consistently.**

General Comments

- The term, “shall have evidence of compliance” is ambiguous. The precise nature of the evidence needs to be stated. If the intended meaning is that the reporting entity should keep copies of written documentary evidence on file to be provided upon request, it should be so stated. Alternatively, if having a person available who witnessed the entity’s compliance is sufficient, it should be so stated. Further, to whom the evidence must be provided must be stated in the standard.
- The term, “on an annual basis”, should be changed to “on at least an annual basis”, in every instance of its use, if that is what is intended.
- The term “customer” should be changed to “transmission user”.
- The term “transmission system user” should be changed to “transmission user”.
- The term “DSM programs” should be changed to “DSM measures”.
- The terms “first month” and “first year” are ambiguous. They could mean “current year”, “current calendar year”, “first year after the calendar year”, “rolling 12-month period”, etc.
- Thirty days is too long to present evidence of compliance. Some of the documentation can be prepared within these thirty days. Suggest five (or no more than 10) business days.
- The boxes labeled, “Compliance Monitoring Process” in each section have no context. The labeling in the existing document is clear, so the labeling should be transferred or the new language needs to include timeframe and responsibility.
- Make consistent use of the term, “Responsible Entity” in the *Applicability* part of each section. Define according to each section. Use this term in the *Requirements and Measures* areas instead of repeating the entire definition of what the responsible entity is for that section.
- Under the Measures part of each Section, use the reference to the Requirement specified consistently (i.e. 068-R2-1 vs. Reliability Standard 068-R2-1).
- Use sub-point numbering or bullets consistently.

Specific Comments

51. Transmission System Adequacy and Security

In this section, the term, “NERC Region” is utilized and should be changed to “Regional Reliability Council”.

Pg. 10: Section 2 Measures: M2-2: change to read, “The Planning Authority...its reliability assessments and corrective plans **per Standard 051 R2-3**”.

Pg. 16: Section 3 Measures: M3-2: change to read, “The Planning Authority...its reliability assessments and corrective plans **per Standard 051 R3-3**”.

Pg. 20: Section 4 Measures: M4-1: change to read, “The Planning Authority...the system responses per Standard 051 R**4-1**”.

Pg. 20: Section 4 Measures: M4-2: change to read, "The Planning Authority...its reliability assessments per Standard 051 R4-2".

52. System Adequacy and Security Assessment

No comments.

53. Facility Connection Requirements

No comments.

54. Documentation and Review of Available / Total Transfer Capability Methodologies and Calculations

Page 1/10 – 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.

Page 9/10, section 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.

Page 2/10, section 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.

Page 3/10, section R1-1, letter *f*; change the word "*customer*" to "*native load*".

Page 4/10, section R1-1, letter *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*".

Page 7/10, section 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 it complied with NERC's request in accordance with 054-R2-3.*"

Page 8/10, section R3-1; change "on how" to "by which".

55. Documentation and Review of Capacity Benefit Margin Methodology and Calculations

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.

Page 10/15 – CBM is only an import quantity. The text of 55-R3-1-2 should be changed to reflect this. Also, in section 2, change “Load Service Entity” to “Load Serving Entity”.

Page 3/15, Section R1-1, letter c; Change “...units within...” to “...units which affect deliveries into or within...”

Page 7/15, Section R2-1, letter 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.”*

Page 7/15, Section R2-1, letter c; remove the words “same” and “also” in the second sentence to eliminate unnecessary words.

Page 7/15, Section R2-1, letter d; change to read as follows: *“Require updated Capacity Benefit Margin values to be made available to the Regions, NERC and transmission users.”*

56. Documentation and Review of Transmission Reserve Margin Methodology and Calculations

No comments.

57. Requirements for the installation and Reporting of Disturbance Monitoring Equipment

No comments.

58. Requirements for the submittal of Steady-state and Dynamics Data and Development of System Models

Page 14/19, R5-1; 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.

Page 16/19, 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.

Pages 18 and 19, Same comment as above regarding posting data sets by a deadline that contain data errors.

59. System Modeling Data Requirements - Generation Equipment

Checking with Joe Egloff on some of the requirements.

60. Facility Ratings

No comments.

61. Actual and Forecast Demands

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.

P 8/19 and others - 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".

P 12/19 – Load forecast uncertainty is addressed in Section 5-R5-1-2. 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 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.

62. Load Models for System Dynamics Studies

No comments.

63. Transmission Protection Systems

No comments.

64. Voltage Support and Reactive Power

No comments.

65. Generation Control and Protection

No comments.

66. Transmission System Control Devices

No comments.

67. Under Frequency Load Shedding

No comments.

68. Under Voltage Load Shedding

P 1/13: 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.”

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).

P 1/13: 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.

P 3/13, Section 1, Requirement R1-1: change to read, “automatic load restoration (see Standard RS 071)”.

P 3/13, R1-2: should read “...and NERC within five business days of a request.” to be consistent.

P 3/13, Section 1, Measures M1-2: should read “...evidence it provided the documentation [in accordance with R1-2.](#)”

P 5/13, Section 2, Requirements R2-1: should start with “Each” instead of “The”.

P 5/13, R2-2: 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.”

P 6/13, Section 2: Measures are not labeled with M1 and M2. The second measure should delete “to NERC”.

P 7/13, Section 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”.

P 7/13, Requirements R3-1: 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.

P 8/13, R3-2: 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).

P 8/13, Section 3: Measure M3-1 should read “...shall include [in its technical assessment](#) the elements identified...”

P 10/13, Section 4, R4-1, subsection a: change to read, “Under voltage load shedding system identification [which](#) shall include...”

P 10/13, R4-2: should read “...and NERC within 30 business days of a request.” to be consistent. Also reduce 30 business days to 5 or 10.

P 12/13, Section 5, Requirement R5-1: 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.

P 12/13, R5-2: Replace “of undervoltage load shedding operations, misoperations, and failures to operate” with “as specified in R5-1” to be consistent.

P 12/13, R5-2: should read “...and NERC within 30 business days of a request.” to be consistent. Also reduce 30 business days to 5 or 10.

P 12/13, Section 5, Measure M5-1: change to read, “...and failures to operate conforms to the requirements specified in 069-R5-1”.

P 13/13, M5-2: Delete “undervoltage load shedding operations, misoperations, and failures to operate” to be consistent.

69. Special Protection Systems

No comments.

70. System Black Start Capability

There is a great deal of ambiguity regarding the eleven different “plans” named in this standard. In general, the term “blackstart capability plan” should be reduced to “blackstart plan”. The terms for “blackstart plan” and “restoration plan” should be clarified as to what plan is being referenced (possibly with documented references) and consistent nomenclature. “Restoration plan” should reference some document or requirement or other written plan.

Further, what is meant by “simulation” in the context of Black Start?

P 1/11, Purpose: change to read, “To develop a system blackstart capability plan, **which** is necessary to...”

P 2/11, Section 1, Requirement R1-1: Last part of first paragraph should read “... intended functions **as specified below**, and **that they** shall be sufficient...”

P 2/11, Section 1, Requirement R1-1: Last part of second paragraph should read “... as appropriate in the development **and implementation** of its blackstart capability plan(s).”

P 3/11: The requirements in Section 1 R1-1 are ambiguous as to who is responsible for implementing or demonstrating each of the four numbered requirements. R1-1.1 seems to be the responsibility of the Regional Reliability Council; R1-1.2 seems to be the responsibility of the generator owner or operator.

P 6/11, R2-1: should have the parenthetical included in the sentence (i.e. move the period).

P 6/11, R2-2: change to read, “...to the appropriate Regional Reliability Council and NERC within 5 (or 10) business days of a request.”

P 7/11, M2-1: should read “...provide documentation **in the form of test results that demonstrate** that the blackstart units...”

P 8/11, R3-2: change to read, “...to the appropriate Regional Reliability Council and NERC within 5 (or 10) business days of a request.”

P 10/11, R4-1: change to read “The **Generator Owner or** Generator Operator of each blackstart generating unit...”

71. Automatic Restoration of Load

P 2/10, Section 1: change to read, “Documentation of Regional Reliability Council load restoration policies and programs.”

P 4/10, Section 1, Compliance Monitoring Process: add Reliability Council after Regional.

P 4/10, Section 1 Levels of Non Compliance Level 1: change “number 4” to “letter d”.

P 5/10, Section 2, Applicability: change to read, “Responsible Entity is a member of a Regional Reliability Council, and may be any of the following:...”.

P 9/10, Section 4 Requirements: change “load restoration relays” to “load restoration equipment, including relays”.

P 10/10, Section 4 Compliance Monitoring Process: change Regions to Regional Reliability Councils.

P 10/10, Section 4 Levels of Non Compliance Level 2: change to N/A to “not applicable”, to be consistent with other sections.

72. Vegetation Management Program

No comments.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

- **There is a lack of clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. We are of opinion that such measures and compliance related items should also be simultaneously addressed in these standards, especially where these exist already. Such items have been identified in our completed NERC Questionnaire below.**
- **Several standards as they are presently written have not addressed the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria.**
- **In some instances, there is a lack of identification of measures during this translation as well as the application of measures is not clear.**
- **Any implementation of the Phase III and IV standards should go through a pilot program and implementation period before formal compliance assessments are completed.**
- **With regards to planning standards, we believe that the Requirements should refer to the "S" 's and not the writing of the measurements of the existing Planning Standards. For example, in Standard 051, the focus is shifted from (as labelled in S1) "The interconnected transmission systems shall..." to (as label in R1-1) "Assessments Requirements". So the Standard is on "assessing that the system meet Table 1 contingencies" and not the "System shall be planned to meet Table 1 contingencies". In the existing standard, assessment is a measure of compliance and that should be the same in the translation. Therefore, the R's in Version-0 should refer to the S's and the Measures should refer to the M's from the existing Planning Standards. So there should be as many R in Version-0 as there were S in the existing Planning Standards and as many measures in the new Version as there were in existing Planning Standards. So a new translation table should be**

provided in the 2nd draft of Version-0. [Also refer to related comments in Question 2 and in Question 14 (at end of this submission)].

- **Several issues are identified and appropriate suggestions/qualifications are presented in order to facilitate NERC SDT to make the corresponding improvements. Please see specific details and comments as provided below including those under Q13 and Q14.**

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

- **Overall the IMO supports the NERC Version 0 Reliability Standards and the efforts of NERC SDT involved in it. However, we have outlined our concerns/issues with appropriate suggestions (via this submission) to facilitate NERC SDT to make improvements in draft 2 of version 0.**
- **During this translation of planning standards, the removal of existing S's have weakened the version 0 planning standards. The "S" language needs to be introduced in version 0 for both clarity and strengthening of the requirements of the version 0 standards. [Also see related comments in Q1 and Q14]**
- **Inclusion of the Phase III and Phase IV Planning Standards would be of great concern in especially in the absence of field testing and required changes.**

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

- **Comments: Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions.**
- **The "S" language needs to be introduced in version 0 for both clarity and strengthening of the requirements of the version 0 standards.**

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

There is a duplication or redundancy of requirements in certain items of policy 5 and 9. There is a need for improvement to reduce or remove these redundancies and better group the requirements.

A few standards that show duplications are identified below as examples:

- (i) Standard 033 Requirement 8 and Standard 018 Requirement 3**
- (ii) Standard 034 Requirement 1 and Standard 019 Requirement 1**

Where there are obvious inconsistencies, they should be resolved and redundancy removed.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

- **However, further changes to the Functional Model are needed to sort out accountabilities between the Transmission Operator & the Transmission Owner.**

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

We believe that there should be clear delineation between Business Practices and Reliability standards. We tentatively agree to the potential business practice standards with the understanding that these are not separated from NERC version 0 standards and agree with following condition/comment re: bulleted item # 2 as follows: “For purposes of Reliability, the RA shall have the ability to intervene for inadvertent energy payback, where applicable”. We strongly encourage a carefully coordinated and timed implementation to avoid conflicts and duplication. The Version 0 Reliability Standards must accomplish the fundamental reliability requirements. Further review and comment on the revised standards in anticipation of implementation of Version 1 Reliability Standards would be appropriate.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments **We agree that the RA is the highest authority and must have ultimate accountability. Splitting and delegating tasks among different organizations must be carefully coordinated so as not to pose any risks to reliability.**

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

We believe that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented. These may be resubmitted through the new standards process, if required.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

We believe that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented. These may be resubmitted through the new standards process, if required.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		-R3 -M1 -M2 -Compliance Monitoring Process -Levels of Non-Comp.	A new terminology “CPM1 & CPM2” is being used that is more related to “Standard under development: Standard 300”. The use of this terminology needs to be clarified or corrected.
004			Proposed Version 0 does not appear to include information from the existing Policy 1D, Standard 2, Requirements 1, 2, 3, 1.1, 1.2, 5, 5.1, 6 & 7. These requirements need to be included.
005		-Compliance Monitoring Process -Measures -Levels of Non-Compliance	- No information imported from existing document Policy 1E Requirement 2 4.8.3.3 & 4.8.3.4. - These are missing and needs to be added in Standard simultaneously.
006		-R1	006 does not appear to import any information from the corresponding existing document Policy 1F Requirements 5, 5.1, 5.1.1, 5.1.1.1, 5.1.1.2 and 5.1.2. These requirements need to be included.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		-R3	<p>In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL.</p>
008		<p>-Measures</p> <p>Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>In 3rd paragraph, ‘Control Area Operator’ should be replaced with ‘Balancing Authority’.</p> <p>This section is inconsistent with reporting of SOL and IROL violations to the RRO. The term RRO should be used consistently.</p> <p>In 3rd paragraph, ‘RELIABILITY COORDINATOR’ should be replaced with ‘Reliability Authority’.</p>
009		<p>-Measures</p> <p>-Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously</p>
011		-R2	<p>A new task “Connectivity of adjacent Transmission Service Providers” is added for verification and assessment by the Transmission Service Providers in order to approve or deny an Interchange Transaction.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		<p>-R2</p> <p>-R2</p>	<p>The 4th bullet should be amended to read "all interchange transactions" not "multiple interchange transactions".</p> <p>The 5th bullet is not included in existing policy - it makes sense to include it however it is a new requirement.</p>
013		<p>-R4</p> <p>-R5</p>	<p>- This requirement includes the existing PSE responsibility for updating tags associated with dynamic schedules where they deviate by more than 25%. The drafting team is asking for acceptance of new criteria however a question is still raised whether for transactions >100MW the requirement is 10% or 25%. Which of this is required or appropriate.</p> <p>- The reference should be Policy 3D, Requirement 2.5.</p>
014		<p>R3</p> <p>-Measures</p> <p>-Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>Change "to operating personnel" to "to its operating personnel."</p> <p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously.</p>
015		Applicability	Add Generator Owners and Load Serving Entities. Extend R5 to include these Functional Model entities.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020		-Attachment 1-	Under (1.) 'RELIABILITY COORDINATOR' should be replaced with 'Reliability Authority'.
023		R1	Change "operating personnel" to "its operating personnel."
025		<p>R5</p> <p>R7</p> <p>-R1 Measures: -Compliance Monitoring Process - Levels of Non Compliance</p>	<p>Remove 1, 2, 3, 7, 8 and 9. We recommend that the fuel related guides are not considered for translation into requirements.</p> <p>Does the term "as applicable" allow the Functional Model entities to choose which bullets apply to them?</p> <p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously. Existing P6T1 outlines the levels of non-compliance.</p>
025		Potential additional elements of requirements R5	<p>Potential additional elements of Requirement R5: We are of the opinion that at a minimum, critical existing requirements from "noted potential additional elements" should be made a part of Requirement R5, although they may included as guides in Policy 6B. Existing Template P6T1 outlines most of these requirements as mandatory.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
027		R4	We are concerned that elements of Policy 5, Section E have not been sufficiently addressed in this translation.
028		Levels of Non Compliance	The Compliance Monitoring requirements appear to be related to System Restoration as opposed to Control Center Recovery requirements. We would like the Drafting Team to review this section.
030		Measure & Level of non-compliance: Measures	Existing template outlines a clause related to "Interview Verification" requirements. Moreover, non-compliance level 4 in existing template P8T1 refers to the following: ".or the interview verification items 1 and 2 do not support the authority of the Reliability Authority....". Such interview related items referred to in the existing P8T1 should be translated in the new language measures and in level 4 non-compliance for completeness/correctness.
030		M-1	Additionally, in element #1 of the M1 measures, the use of the term "operating position" and "position" cause ambiguity/confusion, whereby the notion of a System Operator and System Personnel are clearly delineated in the old version of P8T1.
031		-R1	R1 may also need to include corresponding existing document Policy 8B's Requirements 1.5, 1.6 and 1.7. Attachment 1 referred to in this Requirement, bullet 5 does not exist in the materials.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		R1.2	<p>“Positions that are directly responsible for complying with NERC.” Should be changed to;</p> <p>“Operating Personnel in positions that are directly responsible for complying with NERC.”</p> <p>It should be consistent with the existing template P8T2</p>
033 & 018		R8 & R3	<p>There is duplication or redundancy of requirements between policy 5 and 9. Standard 033 Requirement 8 and Standard 018 Requirement 3 appear to be the same.</p>
034		R1	<p>This should also be addressed in std 029.</p>
007, 017, 018, 019, 021, 022, 023, 024		<p>Measures: Compliance Monitoring Process, -Levels of Non Compliance</p>	<p>Note that the associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing from the above noted standards. We suggest that these standards should be reassessed in near future to determine the requirements for their associated measures and levels of non-compliance. Accordingly, these should then be specified where applicable.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Comments on Planning Standards:

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

2) std 056 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

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

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

5) std 058 Section 6 -R6-1:

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

- 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.

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.

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.

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.

9) std 059 Section 4 -R4-1, first & second paragraph:

- “... provide the Regional Reliability Councils with ...” shall be read instead of “... provide the Regions with ...” to be consistent with the Standard.

- “... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.

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.

11) std 061 Standard Applicability:

- This standard is applicable to the Regional Reliability Councils which are not defined in the NERC’s Functional Model.

- “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”.

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.

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

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?

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.

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.

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.

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.

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.

20) std 062 Standard Applicability:

This standard is applicable to the Regional Reliability Councils which are not defined in the NERC’s Functional Model.

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 ...” .

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.

24) std 064 Section 1 -Requirements (M1-4):

Need to clarify whether 30 days or 30 business days.

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.

26) std 067 Section 1 -Requirements (R1-2, R1-3):

-Compliance Monitoring Process:

Need to clarify whether 30 days or 30 business days.

27) std 067 Section 2 -Requirements (R2-2):

Need to clarify whether 30 days or 30 business days.

28) std 067 Section 2 -Measure:

No measures specified.

29) std 067 Section 2 -Compliance Monitoring Process:

Need to clarify whether 30 days or 30 business days.

30) std 067 Section 3 -Requirements (R3-2): Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

31) std 067 Section 4 -Requirements (R4-2):Compliance Monitoring Process:

Need to clarify whether 90 days refers to 90 business days.

32) std 070 Section 1 -Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

33) std 070 Section 4 -Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

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 ...".

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.

OTHER COMMENTS

We suggest that with regards to Version 0 standards, an updated glossary of terms and definitions should be developed and made available to the industry.

We suggest that in version 0 standard, a reference to the associated NAESB BPS should also be provided, as and where applicable (especially in standards related to Policy 3).

In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL. standard 7, R-3

Overall we support the NERC Version 0 Reliability Standards and the efforts of NERC-SDT involved in it.

**** Table I: Comments related to either missing or inconsistent references.**

Please note that the comments in Table I below are based on the original posting of Ver 0 Operating Standards-matrix. A few of the concerns mentioned below may have already been addressed/corrected in later published reference document (re: operating policy mark-ups). This information is provided to facilitate NERC SDT for its purposes.

008			Reference to Template P2T2 is missing.
009		-R8	In 2nd paragraph, Policy 2B Requirement 4.2 should be Policy 2B Requirement 3.2. R8 is covered by Policy 2B Requirement 4.

012		<p>-R1</p> <p>-R2</p> <p>-R3</p>	<p>The reference for the last bullet should be Policy 3B, Requirement 4.1.3 instead of Policy 3C, Requirement 3.4.</p> <p>The reference should be Policy 3B, Requirement 1 instead of Policy 3B, Requirement 4.1.3.</p> <p>The reference should be Policy 3A, Requirement 6 instead of Requirement 1</p>
013		R5	<p>- The reference should be Policy 3D, Requirement 2.5.</p>
017		-R6	<p>Policy 4D Requirement 5.1 does not exist. R6 is covered by Policy 4D Requirement 6.</p>
025		R1	<p>Reference to Policy 6B Requirement 1 is missing.</p>
032		-R1	<p>R1's existing document references have been given as Policy 8C Requirements 1, 1.1 and 1.2 whereas these requirements do NOT exist in the original Policy 8C. In fact, the Version 0 standard 032 Requirement R1 has been derived from Policy 8C Standard 1.</p>
019	-R1	Reference to Policy 5B Requirement 1 is missing.	

	-R2	Reference to Policy 5B Requirement 2 is missing.
	-R4	Reference to Policy 5B Requirement 2.2 is missing.
020	-R3	Reference to Policy 5C is missing.
	-R4	Reference to Policy 5C Requirement 1 is missing.
	-R5	Reference to Policy 5C Requirement 2.1 is missing.
	-Levels of Non Compliance	Reference to Template P5T1 is missing.
021	-R1	Reference to Policy 5D Requirement 1 is missing.
	-R2	Reference to Policy 5D Requirement 2 is missing.
	-R3	References to Policy 5D Requirement 3 and Requirement 4 are missing.
	-R4	Reference to Policy 5D Requirement 5 is missing.
022	-R1	Reference to Policy 5F Requirement 1 is missing.
	-R2	Reference to Policy 5F Requirement 2 is missing.
	-R3	References to Policy 5F Requirement 3, Requirement 3.1, Requirement 3.2 and Requirement 3.3 are missing.
	-R4	Reference to Policy 5F Requirement 6 is missing.
	-R5	Reference to Policy 5F Requirement 7 is missing.
023	-R1	Reference to Policy 5G Requirement 1 is missing.
	-R2	Reference to Policy 5G Requirement 2 is missing.
	-R3	Reference to Policy 5G Requirement 3 is missing.
028	-Standard 028	Reference to Template P6T3 is missing
	-R1	Reference to Template P6T3 is missing belonging to bulleted items 1-7.

029	-R4	R4 (which talks about the language of communication used) refers Policy 7B Requirement 2 as its corresponding existing document. Whereas, the Policy 7B Requirement discusses a different topic, Inter Regional Security Network.
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Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

It seems the appropriate place to place requirements on these entities is in some form of interconnection agreement with the transmission provider unless (until) there are federal or state regulations that impose these standards on those entities.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005			I don't understand why this standard applies to LSE or generation operator. The entity owning the interconnection point (distribution or transmission owner) should have requirements included in some form of interconnection agreement. In many cases, LSE or generation owner will not understand the need, or have the ability (by itself) to insure this standard is met.
014			Requirements on generator owner should be placed in interconnection agreement.
016			Requirements on generator owner should be placed in interconnection agreement. Why does this not apply to LSE as well? If their protection schemes aren't coordinated couldn't that cause problems? Again, any requirements should be placed in an interonnection agreement.
017			Requirements on generator owner should be placed in interconnection agreement. Why does this not apply to LSE as well? If their protection schemes aren't coordinated couldn't that cause problems? Again, any requirements should be placed in an interonnection agreement.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The items reflected in the detailed comments below are all show stoppers, with the exception of the comments on Standard 070.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

New requirements were established in many cases.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
057	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".
063	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.
069	1	R1-1 Item 3)	The sentence should finish ".. meeting the performance requirements defined in sections 1,2 and 3 of the Standard 051."
070	1	M1	Should be numbered as M1-1 for consistency.
070	1	M2	Should be numbered as M1-2 for consistency.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	1	R1-2 Item 1	Add the words 'and affected systems' the following sentence: 'Procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems'
051	3	R3-2	The first sentence should reference Requirement 3-1 as R3-1 to be consistent.
061	Standard Applicability		Replace with Planning Authority and Regional Reliability Council (Sections 1 & 2) Load Serving Entity, Planning Authority and Resource Planner (Sections 3-8)
067	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.
068	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	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).
002		Policy 1B, Sections 2.3, 3.3.1, 5 & 7	Disturbance Control Performance - Recovery time duration: "The duration of the incident in hours, minutes and seconds to have the ACE return to 0" - should be changed to, "The duration of the incident in hours, minutes and seconds to have the ACE return to 0 or predisturbance value."
065	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.
065	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.
065	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".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	6	6-1	<p>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.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The frequent use of the term "have evidence it provided" in many of the requirements establishes a new requirement in many cases. The requirement establishes new tracking/logging requirements on the part of the entity, whereas those requirements should be part of the compliance monitoring function at either the Region or NERC, depending on who is responsible for monitoring compliance with a given measure or requirement. As far as the entity is concerned, they will probably wish to maintain a copy of submitted information, but they should not be required to perform the compliance tracking function.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

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Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

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Do you agree with this approach?

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Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

There are some key reliability requirements missing. Entire sections are mislabeled. Formatting in some sections is so poor, it is hard to determine what the final language to be evaluated is. Terms that had always been defined are no longer formatted as though they will continue to be defined terms (i.e. Net Scheduled Interchange). A clean version from start to finish needs to be provided to eliminate formatting discrepancies and errors and allow us to focus on the actual material.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

New language has been inserted when the instructions distinctly stated that new language would not be proposed or approved in this version. Where this new language is inserted, it is not noted nor any explanation offered for its existence. Examples are given in Question 13.

Some sections were entirely eliminated with no notation as to why. A couple of existing Interchange schedule requirements were omitted in Version 0. NERC Policy 3 B - 4.1.2, 5.1, and 5.2 establish some limits for maximum NSI between two control areas. Evaluating pending tags or interchange requests against these limitations should be part of Standard 011. These are critical requirements that fit within Reliability Assessment. Entities that exceed these limitations must be held accountable (suggested language in Question 13). These are clearly reliability issues that should not be left off of these requirements.

Definitions that were contained in many of the policies have been eliminated in the translation. It is possible the location of these will reappear in another form. Until these definitions are visible, it is not possible to make an accurate comparison.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

It is not a reasonable translation when new language has been inserted without justification and prior requirements have been deleted. If this is the method that will be used, do not instruct those reviewing the material that there has been no material changes to the documents. Question 13 clearly states, "the Drafting Team is limited in scope to translating existing reliability rules". That leads one to believe that no new material will be included and the focus can be placed on the translation. It is critical that any new language that was proposed in this version be separated out and put through the proper channels to change language within these standards. Additionally, any language that was stricken in this version must be reinstated and the proposal to delete it must go through the same process (excluding that which was converted to a NAESB BP).

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

It is evident that the initial translation was not a smooth process. Including additional changes would further complicate the process at this stage. When the changes are made, a reference document should be created to map existing policy to substitute language in the new standards, or noted where duplications are omitted in new standards, or deferred to NAESB to address (if such a reference has not already been created).

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		R3 or new R#	There are some important missing reliability considerations that are in the existing Policy 3 that should be included in Version 0 as requirements. Reliability Authority or perhaps even Balancing Authority tag assessment should ensure that proposed interchange transactions or schedule changes do not knowingly cause any other systems to violate established operating reliability criteria. (Current NERC Policy 3 B, 4.1.2)
011		R3 or new R#	Reliability Authority or Balancing Authority tag assessment should ensure that proposed interchange transactions or schedule changes do not cause the maximum Net Scheduled Interchange between BA's to exceed the total capacity of facilities or the established network Total Transfer Capability (TTC) between the BA's (Current NERC Policy 3 B, 5.1-5.2). Total Capacity of Facilities and TTC should be added as defined terms.
005		R8	Section 4.3.1.2 of Policy 1E was excluded with no reason provided.
013		R1	It may be a good idea to clearly define some requirements on establishing a reliability limit. If it is not proper to allow denial of a tag curtail request then perhaps that should be spelled out in the requirements. Tag curtail requests currently qualify for passive approval even if late yet an entity could deny the request. The NERC Interchange Subcommittee addressed this issue in a letter submitted on 6/10/02 (continued in next field).
013		R4 (cont.)	(cont. from above) From NERC IS letter. Curtailment orders may be denied only for the following two reasons: 1. The order requests actions in the past (for example, an order to curtail a transaction five minutes ago). 2. The order for curtailment cannot be reliably implemented. In either case, the denying party should immediately issue its own curtailment order to effect the transaction curtailment.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		R4	The proposed dynamic interchange schedule language (included in Draft 0 comments column) should be adopted.
005		R6	Net Actual Interchange and Net Schedule Interchange are not formatted as defined terms here. Will these no longer be defined terms?
008		R1	Language in Draft and Operating Policy Markup do not match.
008		R4	Language in Draft, Operating Policy Markup and referenced Compliance Template P2T2 do not match.
008		Levels of Non Compliance	Could not find the following statement in P2T1 as referenced.Draft: "The limit violation was reported to the RELIABILITY COORDINATOR who did not provide appropriate direction to the Transmission Operator resulting in an IROL violation in excess of 30 minutes duration."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
008		R3	Last paragraph of Operating Policy Markup, "Coordinating transmission outages." States, "Needs to move to Policy 4 template" but there will no longer be a Policy 4 or teplate.This is also new language added to the Standard.
009		R5	Language in Draft and Operating Policy Markup don't match.
009		R8	Language in Draft and Operating Policy Markup don't match.Draft: "The GENERATOR OPERATOR shall provide information to its Transmission Operator" Operating Policy Markup: "The GENERATOR OPERATOR shall provide information . . . to its Reliability Authority."
009		R10	Operating Policy Markup includes DISTRIBUTION OPERATOR.
009		R11	Language in Draft and Operating Policy Markup don't match.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014		R1	Language in Draft and Operating Policy Markup don't match.
015		R2	Language in Draft and Operating Policy Markup don't match.
015		Measures	I couldn't find a source/reference for this.
015		Compliance Monitoring Process	"Entities" are specified in P4T2
016		R2	Language in Draft and Operating Policy Markup don't match.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
016		Measures	Language in Draft and P4T4 don't match
016		Levels of Non Compliance	Level 4 language in Draft doesn't match P4T4.
017		R4	Language in Draft and Operating Policy Markup don't match.
024		R2	Language in Draft and Operating Policy Markup don't match.
024		R6	Language in Draft and Operating Policy Markup don't match.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R7	<p>Language in Draft and Operating Policy Markup don't match.</p> <p>Should "Contingency" be all upper case?</p>
024		R9	Should "Contingency" be all upper case?
024		R10	Should "Interchange Schedules" be all upper case?
024		R12	Language in Draft and Operating Policy Markup don't match.
024		R16, R17, R18	Operating Policy Markup says "immediately" instead of "without any intentional delay."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		Purpose	Operating Policy Markup says "shall develop" and "These plans shall. . . ." instead of "need s to develop" and "These plans need. . . ."
025		R4	New language added.
027		R2	New language added.
027		R4	Should "Interconnection" be "INTERCONNECTION"?
028		Various	Compliance Template P6T2 is given as the reference for several requirements but it should be P6T3.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		R1	PTT3 specifies that the plan is written and kept current.
028		Levels of Non-Compliance Level 2	Draft states there are 10 requirements. Template states there are 9.
001		?	Redline version shows more of the Introduction section included in the Standard, including the addition of a term "Standards Developer" in the place of Resources Subcommittee. Who is the "Standards Developer" and why does this term not exist in the Standard?
001		M1	Reference to "reporting area" should now be converted to Functional Model term.
001		R2.5?	Section 2.3 from Policy 1A is entirely excluded from the conversion with no explanation.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R6	First paragraph, "Balancing Authority" needs to be formatted as a defined term, if indeed that is the reference. This reoccurs throughout Standard 002.
002		Applicability	Reserve Sharing Group is shown as a defined term. Later in the conversion (Policy 9), the term is deleted with the note that it is no longer applicable to the Functional Model.
002		Measures	This is a mention of a correction to the current policy. The figure that demonstrates the reaction of ACE to a disturbance should be updated to show "15 min.". Even though it is not specifically reflecting compliance to the 15 minute standard, showing "10 min." will likely confuse people from the previous 10 minute requirement.
002		R3	DCM is referenced and defined. Then starting in the Measures section and continuing through the end, all other references are to the former DCS.
037		R7 and R8	Conversion document skips from R6 to R9 with no explanation. Is R7 and R8 left blank intentionally?

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

To summarize, there are multiple incidents of added language, deleted language, improper formatting, missing sections, added terms, references to deleted terms. We were not given the room to site each example. We would recommend the drafting team address these problems first to provide a better product for the industry to review before proceeding with additional changes.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:		Dean Schiro			
Organization:		Xcel Energy			
Telephone:		612-337-2376			
Email:		dean.e.schiro@xcelenergy.com			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators			
<input checked="" type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: Xcel Energy					
Lead Contact		Dean Schiro		Organization: Xcel Energy	
Telephone:		612-337-2376		Email:	
		dean.e.schiro@xcelenergy.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Dean Schiro	Xcel Energy	1	Martin Trencce	Xcel Energy	1
Gerald Stellern	Xcel Energy	1	Bob Cochran	Xcel Energy	1
Thomas Green	Xcel Energy	1	David Kral	Xcel Energy	5
David Lemmons	Xcel Energy	6	Robin Kittel	Xcel Energy	1
Steve Beuning	Xcel Energy	5	Kerry Franklin	Xcel Energy	1
Robert Johnson	Xcel Energy	1			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

If comments are taken into consideration and incorporated into the final version approval would be recommended.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

If comments are taken into consideration and incorporated into the final version approval would be recommended.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Xcel Energy agrees with minimizing the changes in Version 0 to minimize confusion and questions. However, Xcel Energy would like to see the redundancies between standards removed soon after the adoption of Version 0. Xcel Energy recommends that the operating guides be as short and concise as possible without having requirements in multiple locations. Having the same requirement in multiple locations causes unneeded confusion and opportunity for error.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

In order to facilitate this process, Xcel Energy agrees with leaving other Business Practices in the NERC Standards until such time that the Business Practices can be removed in the Version 1 Standards. Xcel Energy requests any forth coming shift to Business Practices be clearly communicated as to the standard modification and corollary NAESB Business Practice, and timing of such changes. NERC should propose how such changes will be promulgated and if NAESB is to develop the business practice how NERC will remove the business practice from the NERC standards. NERC should, as part of this process, list those business practices that will be removed in the future and a timeline for this being completed.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

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Question 9:

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Do you agree with this approach?

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Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

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During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Version 0 Standard 065 (III.C) needs to be refined to included the comments received during the testing phase before it can be included in Version 0.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Although Xcel Energy recognizes that these six Phase 4 standards are beneficial to the reliability of the system, these Phase 4 standards should not be included as part of the Version 0 translation given that field tests have not been performed. The best solution is to submit individual Standard Authorization Requests (SAR) for these six standards so they can be developed through the normal Standards Development Process which would allow for full industry participation, field testing, and revisions based on test results before these become approved.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The Standards Drafting Team did an admirable job translating the standards in the short amount of time they had available.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As stated, this assumes acceptable improvements are made in response to comments.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

See responses to questions 11 and 12.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

This type of change should be addressed in Version 1.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

No comment.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

No comment.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

The ATC and CBM portions of the I.E1 and I.E2 measurements address business practices and should be deleted from Version 0. The TTC and TRM portions of the I.E1 and I.E2 measurements address reliability issues and should be retained in Version 0.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

There were a significant number of comments recommending numerous "fixes" to the III.C standards/measurements when they were field tested. These comments have not yet been addressed, and should be considered in Version 1. If any of the III.C measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

All Phase IV standards/measurements require significant "fixes" and should be considered in Version 1, not Version 0. However, we realize that there may be other factors influencing the decision to keep some of these in Version 0. If any Phase IV measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
33		Purpose	The Purpose makes requirements by using words like "must". The purpose should be rewritten to simply describe the reason the standard exists.
34		R3	In the Requirement, the word "AND" is capitalized when it should not be.
		R7	The word "wide area" should be capitalized.
		R9	The word "affects" should be replaced by "effects".
35		Purpose	The Purpose should be rewritten to simply describe the reason the standard exists. Again, requirements do not belong in the Purpose of a document.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
		R1	The wording here changes Policy. Policy 9 used the word "may" when referring to monitoring of sub-transmission. Version 0 has replaced this with "shall" making it mandatory that the RA monitor sub-transmission. This is a change in policy.
		R2	The wording in this requirement is confusing. Perhaps some rewording would make it easier to understand.
37		R1	R1 should be broken into two requirements.
38		R7	The source of this requirement in existing policy is not clear.
		R11	This requirement shows an inconsistency in how RAs are to communicate with Generator Operators. In some cases Version 0 implies that the RA will only communicate with them through the BAs, while in other instances the RA is required to talk directly to the Generator Operators. The Drafting Team needs to make a clear determination of proper communication flows and make sure that it is accurately and consistently reflected in Version 0.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
		R19	Policy 9C is referenced here when in fact it should be 9E.
39		R7	The source of this requirement in existing policy is not clear.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Some of the current Planning Standards list reporting requirements in "days" while others list it in "business days." A minor revision could be made in Version 0 to resolve this inconsistency.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Exelon Corporation would most likely vote to approve Version 0 Standards with the understanding that issues with Standards that have not been through all aspects of NERC's due process have been addressed (e.g. Phase 3 & 4 Planning Standards inclusion in Version 0).

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The inclusion of of phase 3 & 4 Planning Standards (that have not gone through NERC due process) appear to be the "show stopper".

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Operating and interconnection agreements can often fall into dispute over a number associated issues (e.g. re-imbursement, interpretation). Including the requirements applicable to all parties in the Version 0 adds "regulatory requirements" and basis for ensuring compliance.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Exelon Corporation agrees with the business practices identified in question 7, in addition Exelon Corporation recommends the following for immediate conversion to business practices:

Policy 1F requirement 4 Exelon Corporation does not see inadvertent accounting (after the fact) as a reliability issue.

Policy 1 Appendix Sections 1B, 1C and 1D - Exelon Corporation does not see ACE special cases reliability issues.

Policy 1 Appendix 1F, Section C - Exelon Corporation does not see on/off peak definition as a reliability issue

Exelon Corporation recommends the following for future (Version 1) conversion to business practices:

Policy 5C Requirement 2.1 & 3 Exelon Corporation views the use of generation/load resources as a business practice.

Policy 9 Appendices 9C1, 9C1B, 9C1C Exelon Corporation would endorse a more effective business practice based transmission congestion management tool.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Exelon Corporation agrees with this approach on a temporary basis, with the understanding that all delegated activities will be established through a formal agreement(s) and as the industry evolves and responsibilities are assigned/defined differently than they exist today (Future Role of Regional Reliability Organizations) the responsibility is appropriately re-assigned.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Phase 3 and Phase 4 NERC Planning Standards that haven't incorporated the learnings of field testing or even been through field testing at all, respectively, either should not be included as part of the Version 0 Standards or complete the exercise and benefit of field testing.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Phase 3 and Phase 4 NERC Planning Standards that haven't incorporated the learnings of field testing or even been through field testing at all, respectively, either should not be included as part of the Version 0 Standards or complete the exercise and benefit of field testing.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002			Exelon Corporation agrees with the placing of some requirements and equations from the reference document into the Standard.
004			Exelon Corporation agrees with the drafting team in regard to 1) moving time error procedures to NAESB and moving R1 to Standard 38, allowing the removal of Standard 4.
006			Exelon Corporation agrees that Inadvertent Interchange payback should be developed by NAESB as a business practice.
007		R3	Exelon Corporation suggests that Transmission Owners be included in the "Applicability" section and listed within R3. Transmission Owners are responsible for developing equipment ratings.
008		R5	The requirement of the Reliability Authority to pass on IROL violations (R5) should remain a part of this Standard until version 1 is composed.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
009		R5	Exelon Corporation would not view the combining R4 & R5 as a significant change to the objective of this Standard or existing Operating Policy.
013		R4	Exelon Corporation has commented on changing the dynamic interchange schedule requirements several times in the past (when the opportunity to comment was available). With that said we do not believe Version 0 is the time to make the obvious needed change (once the door is opened for this change you will not be able to shut the door on other changes), therefore we suggest this change be implement in Version 1.
014		R3	<p>Based on requirement listed in R3 Exelon Corporation suggests that Transmission Owner be added to the "applicable" list and be included in the R3 statement.</p> <p>Near term load forecast is an essential element for performing advanced application studies (power flow) and is a reliability requirement. The requirement should be left in the Version 0 standard.</p>
016			Operating and interconnection agreements can often fall into dispute over a number associated issues (e.g. reimbursement, interpretation). Including the requirement in the Version 0 adds "regulatory requirement" that provide a better chance of ensuring compliance (leave the requirements for generation owners/operator in the Standard).
017		R3	Exelon Corporation suggests that Transmission Owners be included in the applicability of R3, R4 and R5. The Transmission Owners (in many cases) will be the entity that owns/installs/coordinate new protection systems.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
018			<p>Operating/Service and Interconnection agreements can often fall into dispute over a number associated issues (e.g. re-imbursement, interpretation). Including the requirement in the Version 0 adds "regulatory requirement" that provide a better chance of ensuring compliance (leave the applicability requirements in the Standard).</p>
019		R1	<p>Exelon Corporation believes that a minimum standard of communication equipment must be in place between a balancing authority and generator operators that will be responding to dispatch signals (from the BA). We feel that "appropriate" properly captures that requirement.</p>
020		R6	<p>Based on the requirement listed in R6 - Reliability Authority should be included in the "Applicability" section.</p>
023		R10	<p>Exelon Corporation believes the objective of R10 is to address the over/under generation situations that occur at the on/off peak boundaries, R10 should remain in place in the Version 0 Standards, the ambiguity associated with the requirement should be dealt with in Version 1.</p>
023		R15	<p>We do not have a problem with eliminating redundancies in Version 0 (R15). We agree with the comment of the drafting team associated with R18.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R5	It is the understanding of Exelon Corporation that the drafting team would use the most recent version of the source document(s) as the "overriding" document in the case of conflict. In this case we believe the version of Policy 6 (approved on 6/15/04) should provide the basis for this Standard.
026			Exelon Corporation believes that the "confusion" described should be dealt with in Version 1 (not Version 0).
026			Exelon Corporation suggests that Transmission Owner be included in the "Applicability" section. We believe in most cases that the Transmission Owner will be the entity installing and coordinating automatic load shedding schemes (R2, R3).
027		R4	Exelon Corporation believes that requirement should remain as written, any required clarification should be addressed in Version 1.
029		R1	Exelon Corporation cannot find the apparent redundancy (Policy 5A Req. 1) cited "Comments" section, we suggest leaving R1 as written.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		R1	Exelon Corporation suggests that Version 1 of this Standard be initiated to address the requirement to have NERC Certified Operators that perform functions that are formally delegated similar to the requirement of Policy 9B Req. 3.
033		R1	Exelon Corporation agrees with the logic used by the drafting team.
034		R1	It is not clear whether the drafting team is suggesting that the requirements are redundant and should be deleted or more suitably moved to Standard 029. Exelon Corporation would prefer to see the requirements moved into Standard 029 and any redundancies removed.
034		R3	Although the NERC Reliability Coordinator Reference Document currently states that the "Control Area" is the entity required submit the data to the SDX, Exelon Corporation believes that including the Transmission Operator and Balancing Authorities is a reasonable and logical interpretation.
038		R17	Exelon Corporation believes this requirement is identical to Standard 19 R4 (not Standard 29 as listed in the comments), and endorses removing the redundancy.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
040			Exelon Corporation would not have any issues with combining Standard 040 and 027.
051	4	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.
053	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.
063	1	1	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.
067	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	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).
024		13	Standard 024 should be immediately moved to Version 1 to address the ambiguous wording of R13, which may (as currently worded) provide a loophole that could allow a Transmission Service Provider to set up a process (based on filed tariffs or a "regional" process) that specifically does not include SOLs or IROLs of neighboring areas by setting its own standards.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
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Email:		RJM8@PGE.com			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input checked="" type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: N/A					
Lead Contact Rod Maslowski		Organization: Pacific Gas and Electric Co.(PG&E)			
Telephone: (415) 973-1218		Email: RJM8@PGE.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Kevin Dasso	PG&E	3			
Chifong Thomas	PG&E	1			
Rick Padilla	PG&E	5			
Glenn Rounds	PG&E	1			
Tom Siegel	PG&E	1			
Ted Reece	PG&E	1			
Ben Morris	PG&E	1			
Jim Filippi	PG&E	1			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Our approval is limited to the translation between the existing Planning Standards and Operating Policies and this Version 0 only.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

It would be more efficient to reduce redundancies now to improve consistency and to allow more concentrated focus on the requirements that will remain. Notes in the mapping should allow the industry to adequately track the changes.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

See comments on Question 9.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Reliability is a team effort. Each team member must meet its obligations to achieve reliable system operations. The requirements for each entity should be spelled out in the NERC standards. It is not adequate to "assume" that reliability functions are addressed in service agreements. The NERC standards should either require that the other functions comply with the requirements or spell out the requirements that Operating Authorities must have in their service agreements with the other entities. Service agreements are often negotiated documents that can be influenced by the interests and expertise of the negotiators. Industry standard requirements are a valuable tool for assuring that reliability issues are adequately addressed in these agreements.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Many of the Operating Reliability functions assigned to the Reliability Authority in the functional model are performed by other entities for their local areas. Reliability Coordinators may perform similar functions but for a broader area. The relationship and responsibilities between these entities are a potential source of confusion. Assigning requirements to the Reliability Authority may not adequately define responsibility between the various entities with similar functions. The model should allow for delegation downward as well as upward, so long as operating jurisdictions and authority are clearly defined and communicated. The reliability coordinator function was created so that there would be focus on broader areas of the interconnection. To require that a single Reliability Authority perform all of these functions for every part of the system within its area would dilute that focus. In practice, other entities, such as Transmission Operators within the Reliability Authority area perform many similar functions for their portion of the system. To perform these functions they need to have the information and authority of a Reliability Authority. The comments for Standard 33 appear to recognize this need but the text in the standard imply that the functions are performed by a single entity.

Assuming that one single entity would perform the functions may not align with the intent of the Function Model, which states on page 5, "[t]hen, organizations-whether they be traditional, vertically-integrated control areas, regional transmission organizations, independent system operators, independent transmission companies or so on-can “roll up” those functions they perform, and register with NERC as one or more of the following: Generator Owners, Generator Operators, Transmission Service Providers, Transmission Owners, Transmission Operators, Distribution Providers, Load Serving Entities, Purchasing-Selling Entities, Reliability Authorities, Planning Authorities, Balancing Authorities, Interchange Authorities, Transmission Planners, Resource Planners, Standards Developers, and the Compliance Monitors."

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The

Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
2		Compliance Monitoring	The note for Standard #1 indicates that the compliance monitoring process would be removed from the standard. There is no similar note for Standard #2. Would the compliance monitoring process be excluded from all standards? This is probably OK as long as the compliance measures are adequately defined as to frequency and responsibility, which seems to be the case for Standard #1 but omitting it from Standard #2 would leave out the timeframe in which results must be reported .
4		R1	This standard should be eliminated now rather than later. The requirement should be moved to standard 38 as recommended.
5		Effective Date	Date is missing.
7		Effective Date	Date is missing.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
7		Applicability	Balancing Authority is listed but none of the requirements apply to it.
8		Applicability	Balancing Authority is listed but none of the requirements apply to it. The Balancing Authority should be required to take action as directed by the Transmission Operator or Reliability Authority. May be able to add to R3 or R4.
14		R4	Load Forecasts are essential for reliable system operations and form the foundation for operational planning.
16		Applicability	In reference to the comment about including generator operators in the requirements, we have found it helpful to be able to point to NERC requirements when developing service agreements so would prefer that they be included. See response to Question 6.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
17		Applicability	This standard is not generally applicable to the Balancing Authority. Protection coordination is primarily a Transmission Operator and Generation Operator function. The Balancing Authority should only be required to respond to situations requiring resource adjustments.
18		All	This section could be be simplified to eliminate some of the redundant wording. The concepts and responsibilities are OK.
19		R2	Reliability Authorities are also responsible for notifying other Reliability Authorities.
20		R5	This policy should be reviewed for version 1. Reliability is jeopardize if all reserves are exhausted before load is shed.
24		R3, R4 & R5	The parentheticals "where confidentiality agreements allow" imply that confidentiality agreements trump coordination of operational plans needed to assure system reliability. They should be eliminated.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
25		R5	Most of the items appear to be needed in any emergency plan to assure system reliability. Those that are should be included in the requirement.
26		Purpose	This standard should address requirements of automatic schemes and operational plans. Implementation of plans should be covered in other requirements as long as they require adherence to the plans.
27		R4	Concur with comment.
27		Applicability	Should the requirement for Generation Operators to have restoration plans for units that require black start capability be included here? A set of minimum restoration plan elements similar to those being considered for emergency plans should be added.
32		Levels of non-compliance	The measures should apply to the Reliability Authority, Balancing Authority and Transmission Operator, separately. As written, only one of the three would need to meet the criteria. Change "and" to "or".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
36		R1	The requirement for 24/7/365 staffing should apply to Balancing Authority and Transmission Operator, as well. The training requirement is redundant with Standard 25, R2 and Standard 31, R2 and should be deleted.
38		R17	Concur with comment.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
062	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.
066			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..."
058			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.
058	2	R2-2	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.
058	6	R6-2	In R6-2, a few of the words in the last sentence duplicate an earlier stated concept. Delete "shall be provided".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
071	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).
051	2 and 3	M2-1, M2-2, M3-1, M3-2	Page 10 of 24, Section 2; Page 16 of 24, Section 3 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?
051	4	M4-1 and M4-2	Page 20 of 24 We believe in the new language "M3-2" should be "M4-2"; and "Standard 051 R3-1" should be "Standard 051 R4-1". The comment column states, 'Added words "have available assessments of" to the language to make it a measurable standard'. However, M4-1 and M4-2 state, "shall provide assessments" instead of "have available assessments of". Is this intentional?
065	12		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: "Maintain its generation facilities according to prudent utility practices" (Page 28, Functional Model
068	3		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).

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
060	2	R2-2	Change title to "Electrical Facility Ratings" to better describe the Standard.
060	2	M2-1	Change "Facility Rating" to "Electrical Facility Rating" to more closely match the existing template.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

None

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Dominion - Electric Transmission Planning expects significant, and acceptable, improvements to be made in Draft 2, Version 0 before we can approve / endorse the translated planning standards and compliance templates. More specific comments are included in subsequent questions.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Yes - Dominion - Electric Transmission Planning does not endorse the inclusion of those reliability standards that have not gone through field testing and/or due process by the industry. This includes a number of the old Phase III standards (specifically, the III.C standards/measures) as well as "all" of the Phase IV measures. See additional comments under Questions 11 and 12.

In addition, there have been many comments and references since the implementation of the NERC Compliance Program in 1999 stating that there are too many Planning Standards and Measures, and that a number of them can be combined, or eliminated entirely, without adversely impacting the reliability of the interconnected transmission system. For instance, a number of the existing planning measures are simply an administrative filing burden rather than serving as a substantive assessment of the transmission system, and the impact of that measure on reliability.

Dominion - Electric Transmission Planning is of the opinion that one of the Drafting Team's "key" objectives in the development of the new Reliability Standards is to reduce the number of standards, going forward, and to retain and/or rewrite only those that are determined to be

"critical" to reliability. Ways to accomplish this include (1) combining existing planning standards where there is overlap / repetition between them into a single standard; and (2) combining those existing planning standards and operating policies into a single "crisp" standard where present compliance requirements cross over the planning standards and operating policies boundaries.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Dominion - Electric Transmission Planning is unclear as to the naming convention being utilized by the Drafting Team as it develops these new reliability standards. We interpret Draft 1, Version 0 as the pure translation of the existing planning standards and operating policies into the new Reliability Standards with minimal or no revision.

If the next revision, pursuant to industry comments, is to be designated as Draft 2, Version 0, Dominion - Electric Transmission Planning endorses initiating improvements to reduce redundancies, and grouping requirements into more efficient standards, beginning with Draft 2, Version 0.

However, if the intent of Version 0 is to simply achieve a smooth and pure translation as a starting point, then Dominion - Electric Transmission Planning endorses making the improvements noted above in Draft 1, Version 1.

Either way, Dominion - Electric Transmission Planning requests, and expects, that the final set of Reliability Standards submitted for approval in February 2005, regardless of their Draft or Version number, to be fewer in number, easier to measure and assess, and revised and/or combined to include clear, concise ("crisp") language as to what is expected, and what is required to achieve full compliance.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Dominion - Electric Transmission Planning has no response to Question 6 since it pertains to operating policies. Dominion - Electric Transmission Operations is submitting their own set of comments to Draft 1, Version 0 that specifically address operating policies and issues.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Dominion - Electric Transmission Planning has no response to Question 7 since it pertains to operating policies. Dominion - Electric Transmission Operations is submitting their own set of comments to Draft 1, Version 0 that specifically address operating policies and issues.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Others have commented that the ATC and CBM portions of the proposed Reliability Standards 54, 55, and 56 (the old I.E standards) constitute business practices, and should not be included in Version 0. Dominion - Electric Transmission Planning disagrees, and feels that both CBM and TRM do serve a reliability purpose, and should remain in Version 0. Recognizing that they also have commercial implications, it would be acceptable to include them in both Reliability Standards and business practices in Version 0 as a transitory step to Version 1.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Dominion - Electric Transmission Planning has no response to Question 9 since it pertains to operating policies. Dominion - Electric Transmission Operations is submitting their own set of comments to Draft 1, Version 0 that specifically address operating policies and issues.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Dominion - Electric Transmission Planning has no response to Question 10 since it pertains to operating policies. Dominion - Electric Transmission Operations is submitting their own set of comments to Draft 1, Version 0 that specifically address operating policies and issues.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Dominion - Electric Transmission Planning does not endorse the inclusion of Reliability Standard 65 (old III.C measures M1-M12) in Version 0. These measures were included in the 2001 compliance program, and prompted numerous questions, discussion, and follow up issues that have yet to be addressed by the industry. Either there was disagreement as to what should be assessed, or there was confusion and uncertainty as to the requirements to achieve full compliance.

Although Dominion - Electric Transmission Planning acknowledges that accurate information on generation protection and controls is needed, and worthwhile, in order to perform assessments / simulations of the transmission system, they should not be included as an approved Reliability Standard until they have been through due process, including industry comments and field testing. This approach has worked well in the past for those compliance standards that needed clarification, and should be endorsed, going forward. If timing is an issue, perhaps an expedited "due process" can be developed to keep things moving forward.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Dominion - Electric Transmission Planning feels strongly that none of the old Phase IV standards and measures, included in the above table, should be included in Version 0, or any other version of new Reliability Standards, until such time that they have gone through adequate field testing and due process.

These measures have not been designated as Phase IV by coincidence; there are legitimate reasons why they have been put off until the end. In some cases, there is no industry consensus on whether or not they add any value to the compliance program, and whether they should ever be included.

Other measures are so confusing and difficult to interpret that the entities to which they apply do not understand what is required. Finally, some of the measures, such as generator testing (II.B), are very difficult, and expensive, to perform, and require expertise that only a few third-party contractors possess. In addition, there are those who feel strongly that these tests, which are performed while a generator is on-line, can have adverse impacts on system reliability should a unit trip while being tested. Also, safety issues must be evaluated fully before tests are performed at nuclear power stations. In order to make such evaluations, it must first be known what tests are required, and what alternative methods are acceptable in lieu of testing to obtain the necessary data.

While Dominion - Electric Transmission Planning acknowledges the value of having some of the information referenced in these measures, such as good generator technical data verified by testing, we also recognize the difficulties and challenges in obtaining such information.

Dominion - Electric Transmission Planning does not endorse the concept of forcing the III.C, Phase III measure, or any of the Phase IV measures into the compliance program until such time the industry has had ample opportunity to comment on the many issues and challenges that exist, and to propose optimal solutions.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name: Paul Rocha					
Organization: CenterPoint Energy					
Telephone: 713-207-2768					
Email: paul.rocha@centerpointenergy.com					
NERC Region		Registered Ballot Body Segment			
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments Group Name: CenterPoint Energy - Real Time Operations					
Lead Contact Dennis Caufield		Organization: CenterPoint Energy			
Telephone: 713-207-2462		Email: dennis.caufield@centerpointenergy.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
John R. Jonte	CenterPoint Energy	1			
Wayne Kemper	CenterPoint Energy	1			
Dennis Caufield	CenterPoint Energy	1			
James Hayes	CenterPoint Energy	1			
Brad Calhoun	CenterPoint Energy	1			
John Brockhan	CenterPoint	1			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

None at this time.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

CenterPoint Energy defers to ERCOT to comment on this question.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

CenterPoint Energy defers to ERCOT to comment on this question.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

None at this time.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

CenterPoint Energy defers to ERCOT to comment on this question.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		R2	CenterPoint Energy agrees with the comment that correcting "the vagueness of the multiple outage criteria" should be addressed in Version 1.
007		R3	In Version 1 - for day-ahead planning recommend adding that RA's, TO's & BA's should also coordinate activities involving generation plans and load flow analysis.
008			Recommend adding RA's to "Applicability".
Global			Global Comment for the entire Version 0 Standards - the RA should be the responsible entity for initiating corrective actions for all IROL violations. Likewise, the TO should be the responsible entity for initiating corrective actions for all SOL violations. Requirements in Standard 8 conflict with or are inconsistent with requirements in Standards 37, 38 & 39.
008		R3	Global Comment - For IROL or SOL violatons and except in extreme emergencies, recommend adding that TO's should always confer with their RA prior to shedding firm load.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
008		R5	CenterPoint Energy agrees that R5 should be in Compliance Monitoring only.
009		R7	Define "deficiencies". i.e +/- 5% of nominal or as defined by the RA.
014		R1	CenterPoint Energy agrees with the comment that this standard should apply to BA's & TO's only. Monitoring of system conditions is different for GO's and their obligations should be covered under service agreements.
015			Compliance Monitoring Process comment - CenterPoint Energy agrees with the removal of the compliance monitoring section from the Version 0 Standard.
015			While incorporating Attachment 1 into the standard, consider adding "or facilities removed from service" to section 2.5 New facilities in place..

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
016			Applicability Comment - As stated earlier, CenterPoint Energy agrees that GO obligations should be addressed through service agreements.
016		R1	Recommend removing all except the last sentence "The RA shall establish the outage reporting requirements" - make this requirement very generic and allow the regions to establish the requirements through their internal policies and procedures.
018		R3	Requirement states that GO's have to comply with directives from both RA's and TO's. This requirement could be clarified with resolution of the GO's being covered under service agreements issue.
019			Global Comment - with a little rewording, this standard could be applied to address both real-time and emergency conditions.
020		Purpose	CenterPoint Energy agrees that Policies 5 & 9 could be combined here and apply to RA's and/or RC's also.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
023		R3	Recommend adding "and appropriate local authorities" to those being notified.
025		R2	Recommend being very specific in defining training requirements for qualified operating personnel - in standards 25 and 31 both.
026		R3, R4 & R5	Recommend considering that RA involvement be added to these three requirements.
027		R7 & R8	Recommend saying "shall periodically" or specify a periodicity (i.e. annually) in both requirements.
040		Applicability	Recommend adding TO's & BA's.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061		Purpose	Existing language was more specific - new version seems lacking in details, especially in generation forecasts (i.e. seven day genplans). Detailed forecasts will allow for more accurate power flow analysis.
064			Global Comment - this standard seems lacking in the responsibilities of the RA relating to voltage support and reactive power issues as it applies to the interconnected transmission system. Regional differences should be addressed here.
065			Global Comment - this standard also seems lacking pertaining to the responsibilities and authority of the RA for monitoring and maintaining network voltage schedules. Regional differences should also be addressed here.
065	3	R3-2	In Version 1 - define the conditions which would allow a synchronous generator to be "exempt" from the requirements.
063		Title	Recommend changing title to read "Transmission Protection System Misoperation Analysis"

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
066		Purpose	Purpose is not clear. Recommend "To ensure that the planning and design of transmission control devices are reliably coordinated with other control devices within a Region and, ..

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

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Commenter Information					
Name:		Pepco Holdings, Inc. - Affiliates			
Organization:		Pepco Holdings, Inc.			
Telephone:		(301) 469-5274			
Email:		rjkafka@pepco.com			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: Pepco Holdings, Inc. - Affiliates					
Lead Contact Richard Kafka		Organization: Potomac Electric Power Company			
Telephone: (301) 469-5274		Email: rjkafka@pepco.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Richard Kafka	Potomac Electric Power Company	3	Victor Davis	Conectiv Power Delivery	1
Michael Mayer	Conectiv Power Delivery	3	John Miller	Conectiv Energy Supply, Inc.	5
William Mitchell	Conectiv Power Delivery	1	Marjorie Garbini	Conectiv Energy Supply, Inc.	5
David Thorne	Potomac Electric Power Company	1	Kenneth Gates	Conectiv Power Delivery	1

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

**PHI voting affiliates would approve subject to two conditions:
NERC BoT confirms that no financial penalties will be imposed for Version 0 Standards,
Reasonable response to comments under Questions 11 and 12.**

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

In general, PHI Affiliates see no "show stoppers" except as noted in Question 1.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Drafting Team should eliminate those redundancies that they can easily identify.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

none identified

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		R1, R2	Functional Model does not require Transmission Operator to have wide-area data, therefore R1 and R2 should be assigned to RA
17		R5	Generator Operator should not directly report to the RA. The GO should report through the TO or BA.
027		R8	Actual testing of many restoration procedures is not practical. Operating experience or simulation are frequently the only measures possible without actual shutdown.
024		R10	Generation Operators do not arrange interchange schedules or interchange ramp rates. Rather, the Balancing Authority must limit net interchange schedules to the combined equivalent ramp capabilities of connected generators.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

At what MW level for generators should the standards apply? Should they apply to any generator regardless of size?

At what KV level do the standards apply? In an RTO/ISO such as PJM, do the standards apply to transmission tariff facilities not under control of the RTO?

Do the Transmission Standards only apply to facilities that impact the bulk system? How would that be determined?

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

ISO-NE believes that the Phase III & IV planning standards should not be included in the Version 0 Standards. Although the Phase III templates went through some field testing, we believe that all comments during the field test have not been incorporated into the standards. The Phase IV planning standards were never field tested due to their controversial nature. While we are supportive of the Phase III and IV standards in general, we believe that they must also go through a full vetting under the Version 1 process. We also believe that any implementation of the Phase III and IV standards should go through a pilot program and implementation period before formal compliance assessments are completed.

ISO New England has a general concern that many of the compliance components within the translations are missing and it is difficult to make a determination if the standards in their current form are ready for measurement.

The Time Control Standard and Inadvertant Interchange Standard requirements should be restored. Dropping or changing these requirements at this point in time disagrees with the premise of developing Version 0 standards.

Standards as they are presently written have not addressed the initial requirement of ensuring that they are clear, well defined measurable and crisp. Significant comments would need to be incorporated to meet this criteria.

It is not clear which facilities would fall under the standards. Many different configurations regarding areas of responsibility (voltage thresholds or MW magnitude) exist across the country. Will the standards adopt a voltage threshold for compliance or will a performance based Bulk Power Definition be developed which determines the facilities to be included in the standards?

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The implementation of the Phase III and IV planning standards as part of the Version 0 standards would be a major consideration in our determination to abstain or approve the entire package, especially if appropriate field testing and implementation timelines were not a part of the implementation plan.

Lack of clear & consistent compliance process.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

ISO New England generally agrees with the literal translation and that it was fairly done in most instances. However, we are concerned that in the translation many standards are assigned to multiple functions under the functional model. This can lead to uncertain lines of authority and responsibility. For each standard there should be one functional entity primarily responsible for the performance of the function.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

There is a duplication or redundancy of requirements in certain items of Policy 5 and 9. There is a need for improvement to reduce these redundancies and better group the requirements.

A few standards that show duplications are identified below as examples:

(i) Standard 033 Requirement 8 and Standard 018 Requirement 3

(ii) Standard 034 Requirement 1 and Standard 019 Requirement 1

Where there are obvious inconsistencies they should be resolved and redundancy removed.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

ISO New England continues to have concerns about the ultimate flexibility of the functional model. We believe that the model will allow multiple sets of hands on the wheel controlling the power system. We have expressed these opinions on multiple occasions and in multiple forums. Specific core issues of concern include the following:

1. Clarity of authority of entities performing the RA function over all core real-time operations reliability functions within their electrical boundary and geographic footprint.
2. Requirement for entities performing the RA function to have a contiguous electrical boundary/geographic footprint.
3. Clarify that the RA entity's system size needs to be consistent with the computational tools and communication capabilities available, and reliably manageable by operators should those tools and capabilities fail.
4. The model needs to clearly indicate that there should be no overlap in RA responsibilities and to preclude the possibility of multiple RA entities having control over common facilities.
5. Clarify that the boundary/footprint requirements for entities performing the BA function should be identified and should preclude generator-only BA areas.
6. Clarify that a BA entity should fall under the authority of a single RA entity and should be within the RA footprint.
7. Clarify that there should be a single IA entity within each RA footprint.

NERC has outlined certain requirements related to "Regions" and translated existing terminology of "regions" to "Regional Reliability Council-RRC." Such RRC role is not specifically elaborated in the Functional Model-FM (approved ver 2), although RRC may be considered as a "delegate" of "Standards Developer" in FM. While this may be an appropriate approach, we suggest that this terminology and appropriate role be specifically clarified/defined in the applicable version 0 standards or in another supporting document.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0

that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

The standards should be developed in such a way that specific tasks should be assigned to one functional entity as the majority provider of the service. The entity that is the majority owner of the service should then be entitled to develop service agreements with those entities that would have delegated tasks under the functional entity. The majority owner of the service would be required to demonstrate, through the registration and certification process, that all functions and tasks are being performed and that agreements are in place to support any delegated tasks. This would greatly simplify the registration and certification process.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.

Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.

Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree

Comments

The importance of the Version 0 Standards to the industry cannot be understated. ISO New England believes that the separation of business vs. reliability standards should be done under the Version 1 process. We are concerned about the establishment of "shadow" standards and business standards at a time when all focus should be on improving reliability. To begin the process of extracting business standards under the tight timelines associated with Version 0 does not seem prudent.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

ISO New England believes that any separation of business vs. reliability standards should be accomplished through the Version 1 process.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The ISO agrees with the partial implementation of the functional model by assuming that all of the Reliability Coordinator requirements should be assigned to Reliability Authorities. However, the RC's role in the functional model is undefined and therefore should be fully transmitted to the RAs under the Version 0 Standards. ISO New England is opposed to delegation of tasks in the upward direction. It has the potential for confusing lines of authority and communication. Under normal system conditions this proposal can work, but under abnormal or emergency conditions it could lead to unexpected negative results.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some comments indicated that planning standards had not been completely field-tested and those standards should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

ISO New England believes that the Phase III & IV Planning Standards should not be included in the Version 0 Standards. Although the Phase III templates went through some field testing, we believe that all comments during the field test have not been incorporated into the Standards. The Phase IV Planning Standards were never field tested due to their controversial nature. While we are supportive of the Phase III and IV Standards in general, we believe that they must also go through a full vetting under the Version 1 process. We also believe that any implementation of the Phase III and IV Standards should go through a pilot program and implementation period before formal compliance assessments are completed.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

ISO New England believes that the Phase III & IV Planning Standards should not be included in Version 0 Standard. Although the Phase III templates went through some field testing, we believe that all comments during the field test have not been incorporated into the Standards. The Phase IV Planning Standards were never field tested due to their controversial nature. While we are supportive of the Phase III and IV Standards in general, we believe that they must also go

through a full vetting under the Version 1 process. We also believe that any implementation of the Phase III and IV Standards should go through a pilot program and implementation period before formal compliance assessments take place.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>In many cases the references to few of existing policies are either missing or are not mapped correctly within the new version 0 requirements. We are facilitating NERC SDT in this matter by identifying some of the inconsistencies or needs of</p>
001	Purpose		<p>Reword the Purpose to read: “To maintain interconnection frequency within the defined limits and bound large net unscheduled tie line flows by balancing real power demand and supply in real-time.</p>
001		<ul style="list-style-type: none"> -R3 -M1 -M2 -Compliance Monitoring Process -Levels of Non-Comp. 	<p>A new terminology “CPM1 & CPM2” is being used that is more related to “Standard under development: Standard 300”. The use of this terminology needs to be clarified or corrected.</p>
002	Measures		<p>There are references to ACE_m, which is not used in the calculations at all. Drop this unless a reason to keep is provided. There is also a lack of clarity in the test concerning ACE little m and ACE big M. Additionally one of the graphs shows a 10 min duration without</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002	Notes		At a recent Resources Subcommittee meeting, the RS interpreted the second contingency rule to exclude off-line resources that were activated to provide contingency reserve. This was always the intent and the addition of a sentence to clarify this would be beneficial.
002		R4	Include the term “disturbance recovery criterion” preferably in the second paragraph.
002			Refer to DCS, not DCM
002		Compliance Monitoring	Drop references to the Performance Standard Training Document and refer to the Section in the Standard itself
003		-R2	R2's existing document references have been given as Policy 1C Requirements 2, 2.1, 2.1.1 and 2.1.2 whereas these requirements do not appear to exist in the original Policy 1C. In fact, the Version 0 standard 003 Requirement R2 has been derived from Policy 1C Standard 1.1.1.
003		-R3	R3's existing document is also stated incorrectly as Policy 1C Requirement 2.2. Requirement 2.2 does NOT exist in the original Policy 1C. The standard 003 Requirement R3 has been derived from Policy 1C Standard 1.1.3. When computing bias, “several disturbances” is vaguely defined.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
003		-R4	<p>R4's existing document is stated incorrectly as Policy 1C Requirement 2.3 & 2.4. Requirements 2.3 & 2.4 do NOT exist in the original Policy 1C. The standard 003 Requirement R4 has been derived from Policy 1C Standard 1.1.4 & 1.1.5. The NERC Resources Subcommittee interpreted that the 1% minimum applies to the computations of Policy 1 Sections 2.1.1 and 2.1.2 [Standard 003, R2]. A specific sentence should be</p>
003		-R5	<p>R5's existing document is also stated incorrectly as Policy 1C Requirement 2.5. Requirement 2.5 does NOT exist in the original Policy 1C. The standard 003 Requirement R5 has been derived from Policy 1C Standard 1.1.6</p>
004			<p>Proposed Version 0 does not appear to include information from the existing Policy 1D, Standard 2, Requirements 1, 2, 3, 1.1, 1.2, 5, 5.1, 6 & 7 from the existing Policy should be restored/added.</p> <p>Repeat answer from Question 7. This should remain a NERC</p>
005		R1	<p>This should apply to Transmission Owners as well</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005		R2	Refer to CPS not CPM
005			Policy 1 Section 4.3.1.2 was omitted. It allows asynchronous Balancing Authorities to use alternative ACE equations other than tie line bias. NPCC requests this be added back.
005			Requirements 4.8.3.3 and 4.8.3.4 from the AGC section of Policy 1 have been removed. They were to be included in a 'notes section' that apparently doesn't exist.
005			Unlike the AIE survey, which was moved into the inadvertent section, the FRC survey was not moved into the frequency bias section. Please find a way to maintain this requirement.
005		<ul style="list-style-type: none"> -Compliance Monitoring Process -Measures -Levels of Non-Compliance 	<ul style="list-style-type: none"> - No information imported from existing document Policy 1E Requirement 2 4.8.3.3 & 4.8.3.4. - These are missing and needs to be added in Standard simultaneously.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
006		-R1	<p>006 does not appear to import any information from the corresponding existing document Policy 1F Requirements 5, 5.1, 5.1.1, 5.1.1.1, 5.1.1.2 and 5.1.2.</p> <p>Repeat answer from Question 7. This should remain a NERC standard</p>
007		R1	<p>Add Reliability Authority to Functional Model entities</p>
007		R2	<p>Add Reliability Authority to Functional Model entities</p>
007		-R3	<p>In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL.</p> <p>These Standards must clearly identify, define and provide</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007			<p>In various locations in Policy 1 related material, there are survey and other requirements referred to in the Performance Standard Reference Document. These Requirements should be moved into the Standard. Also, although the strikeout version of Policy 1 shows a survey section, it was omitted from the translation.</p>
008			<p>Reference to Template P2T2 is missing.</p> <p>Should SOLs be reported to the Regional Council?</p>
008		<p>-R5</p> <p>-Measures</p> <p>Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>Policy 2A Requirement 2.1.1 does not exist. R5 is covered by Policy 2A Standard 2.1.</p> <p>In 3rd paragraph, ‘Control Area Operator’ should be replaced with ‘Balancing Authority’.</p> <p>This section is inconsistent with reporting of SOL and IROL violations to the RRO. The term RRO should be used consistently.</p>
009		<p>R3</p> <p>-R8</p> <p>-Measures</p> <p>-Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>NERC Standards should not dictate how a market works. Remove “(self-provide or provide)”.</p> <p>In 2nd paragraph, Policy 2B Requirement 4.2 should be Policy 2B Requirement 3.2. R8 is covered by Policy 2B Requirement 4.</p> <p>Associated Measure, Compliance</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		-R2	<p>A new task “Connectivity of adjacent Transmission Service Providers” is added for verification and assessment by the Transmission Service Providers in order to approve or deny an Interchange Transaction.</p> <p>Transmission Service Provider should be changed to Transmission Operator</p>
011		-R2 -R2	<p>The 4th bullet should be amended to read "all interchange transactions" not "multiple interchange transactions".</p> <p>The 5th bullet is not included in existing policy - it makes sense to include it however it is a new requirement</p>
012		-R1 -R2 -R3	<p>The reference for the last bullet should be Policy 3B, Requirement 4.1.3 instead of Policy 3C, Requirement 3.4.</p> <p>The reference should be Policy 3B, Requirement 1 instead of Policy 3B, Requirement 4.1.3.</p> <p>The reference should be Policy 3A, Requirement 6 instead of Requirement 1.</p>
013		-R4 -R5	<p>- This requirement includes the existing PSE responsibility for updating tags associated with dynamic schedules where they deviate by more than 25%. The drafting team is asking for acceptance of new criteria however a question is still raised whether for transactions >100MW the requirement is 10% or 25%. Which of this is required or appropriate.</p> <p>The reference should be Policy</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014		R3 -Measures -Compliance Monitoring Process -Levels of Non Compliance	Change “to operating personnel” to “to its operating personnel.” Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously.
015		Applicability	Add Generator Owners and Load Serving Entities. Extend R5 to include these Functional Model entities.
017		-R6	Policy 4D Requirement 5.1 does not exist. R6 is covered by Policy 4D Requirement 6.
018		-R3 -R5	In 2nd paragraph, Policy 5A Requirement 2.2.1 does not exist. R3 is covered by Policy 5A Requirement 2.2. In 2nd paragraph, Policy 5A Requirement 5.1 does not exist. R5 is covered by Policy 5A Requirement 5.
018		-R6	- Second point is covered by Policy 5A Requirement 6.1 and not Requirement 6.2. - Third point missing reference to Policy 5A Requirement 6.2.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
019		R4	Even though this is a direct translation of the existing Policy, NPCC requests a clarification of the repeat back requirements, specifically are they for emergency, abnormal, normal, all
020		R5	Change the last bullet of R5, from Attach 5C to Attachment 1 and clarify that if the first 5 bullets cannot be completed in a timely fashion then you must move to manual load shedding immediately
020		-Attachment 1-	Under (1.) 'RELIABILITY COORDINATOR' should be replaced with 'Reliability Authority'.
023		R1	Change “operating personnel” to “its operating personnel.”
024		R14	We recommend removing this Requirement which references Planning Standard II.B, which has not been field tested. Although NPCC believes II.B has merit, it should go through the SAR process.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R5 R7 -R1 Measures: -Compliance Monitoring Process -Levels of Non Compliance:	Remove 1, 2, 3, 7, 8 and 9. NPCC recommends that the fuel related guides are not considered for translation into requirements. Does the term “as applicable” allow the Functional Model entities to choose which bullets apply to them? Reference to Policy 6B Requirement 1 is missing.
025			Associated Measure Compliance Potential additional elements of Requirement R5: We are of the opinion that at a minimum, critical existing requirements from “noted potential additional elements” should be made a part of Requirement R5, although they may included as guides in Policy 6B. Existing Template P6T1 outlines most of these
026		R2, 3, 4, 5, & 7	The Requirements cited are “planning related “ and should not appear in the “operations related” requirements
027		R4	NPCC’s participating members are concerned that elements of Policy 5, Section E have not been sufficiently addressed in this translation.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		Purpose Levels of Non Compliance	NPCC's participating members request clarification of this purpose. The Compliance Monitoring requirements appear to be related
029		R1 Thru R5	Add "Transmission Owners, Generator Owners, Generator Operators and Load Serving Entities" to the list of FM entities this applies to.
030		Measure & Level of non-compliance: Measures	Existing template outlines a clause related to "Interview Verification" requirements. Moreover, non-compliance level 4 in existing template P8T1 refers to the following: ".or the interview verification items 1 and 2 do not support the authority of the Reliability Authority....". Such interview related items referred to in the existing P8T1 should be translated in the new language
030		M-1	Additionally, in element #1 of the M1 measures, the use of the term "operating position" and "position" cause ambiguity/confusion, whereby the notion of a System Operator and System Personnel are clearly delineated in the old version of P8T1. Clarification of what was intended is requested or use the words as they appear in the Template.
031		-R1	R1 may also need to include corresponding existing document Policy 8B's Requirements 1.5, 1.6 and 1.7. Attachment 1 referred to in this Requirement, bullet 5 does not exist in the materials.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		-R1	R1's existing document references have been given as Policy 8C Requirements 1, 1.1 and 1.2 whereas these requirements do NOT exist in the original Policy 8C. In fact, the Version 0 standard 032 Requirement R1 has been derived from Policy 8C Standard 1.
032		R1.2	"Positions that are directly responsible for complying with NERC." Should be changed to; "Operating Personnel in positions that are directly responsible for complying with NERC." To be consistent with the existing template P8T2
033 & 018		R8 & R3	There is duplication or redundancy of requirements between policy 5 and 9. Standard 033 Requirement 8 and Standard 018 Requirement 3 appear to be the same.
033		R6	The statement is inconsistent with the Functional Model. NPCC does not believe that in all cases an entity needs to be certified at the Reliability Authority level when they are carrying out a "delegated task". i.e. a distribution operator carrying out load shedding on distribution feeders as delegated by the RA.
033		R8	At the end of R8, the inability to perform the directive AND WHY should be communicated to the RA.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
033		R9	Please clarify and provide example(s) of what is meant by the “interest of other entity”.
034		R3	The drafting team posed a question regarding whether TOs and BAs had an obligation to supply RA info. through SDX. This is not in existing policy and NPCC believes this is “out of the scope” of the version zero effort.
034		R1	NPCC’s participating members believe this is appropriately in this Standard and NOT in 029.
034		R5	Please clarify/define what is ”synchronized information system.”
034		R7	Please clarify/define what constitutes “adequate” analysis tools and “wide-area overview”.
038		R17	The Drafting Team comment appears to be making an incorrect reference. The correct reference is to Std 019. NPCC, at this
051	all sections	Regional Differences	See NPCC BPS Definition in Question 1
051			NPCC feels this should be part of the Version 0 standard package. However the S language from the template
053	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
053	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.
054			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
055 & 056			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
54, 55, 56 54	Standards		Why do we need to have 3 standards related to the same existing Standard I.E? "Certain systems that are not required to post Available Transfer Capability values are exempt from
057			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
059			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
061			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
062			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
062	Section 2 Section 3	R2-1 R3-1	If the Std remains in the Version 0; Delete specific about "Hydro-Québec Interconnection".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			Delete specific about "Hydro-Québec".
063			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.
064			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
065			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
066			This is a Phase 4 standard and NPCC believes it is not appropriate for inclusion in Version 0
068			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
070			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0
071			This is a Phase 3 standard and NPCC believes it is not appropriate for inclusion in Version 0

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Allegheny Power does not see any "show stoppers".

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Allegheny Power agrees that the content of the Draft 1 Version 0 Standards is a reasonable translation of the existing NERC reliability rules.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Making the improvements in Version 0 will be more efficient than waiting for subsequent versions.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

As a whole the designations are acceptable. The absense of the Interchange Authority is a concern and should be addressed.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

It is essential that Operating Authorities be translated to the specific functions.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Allegheny Power agrees with the identified business practices.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Allegheny Power does not have any other issues that should be considered as a business practice.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Allegheny Power agrees with the Drafting Teams recommendation that the Reliability Coordinator requirements should be assigned to the Reliability Authorities, but feels that Reliability Coordinator must be able to meet all of the requirements of a Reliability Authority in order to be certified.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Allegheny Power agrees with the Drafting Teams recommendation not to adopt the Interchange Authority in Version 0. However, we feel that the Interchange Authority function should be addressed as soon as possible. The Interchange Authority , as described in the functional model , could be implemented currently. Not adopting the Interchange Authority in Version will provide more time for discussion by the industry.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
017		R5	Allegheny agrees with the Drafting Team that the Generator Operator should report through the Transmission Operator or Balancing Authority.
024		R3	The coordination with neighboring entities need to be further clarified. It can be interpreted that each entity needs to coordinate with all other neighboring entities.
024		R5	The coordination with neighboring entities need to be further clarified. It can be interpreted that each entity needs to coordinate with all other neighboring entities.
024		R6	Not all Transmission Operators have access to Interchange Information.
024		R9	Allegheny Power recommends that the wording "shall plan to respect voltage" be changed to "shall plan with respect to voltage".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R11	Allegheny Power recommends that the wording "shall plan to respect all System " be changed to "shall plan with respect to all System".
024		R18	Allegheny Power agrees with the Drafting Team, that "it would be more appropriate to add this requirement to each applicable requirement above".
025		R5	The responsibilities associated with the emergency plans in Compliance Template P6T1 should be assigned to the specific responsible entity rather than broadly assigning them to Ras, TOPs and BAs.
027			Allegheny Power would support the creation of a Reference Document for the Guides in Policy 6D.
028			The words "needs to Authorities" should be stricken from the Purpose.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		R1	The RA, TOP and BA do not all have responsibility for all of the bullet points. The 8 th bullet should be changed to read "The plan shall include the functions to be coordinated with and among neighboring AREAS. The 9 th bullet should be changed to read "The plan shall include plans for notification to other operating entities as the steps of the restoration plan are implemented".
028			Compliance Monitoring Process - The Self-Certification statement do not apply to "Plans for Loss of Control Center Functionality". Levels of Non Compliance - These levels to do appear to apply to "Plans for Loss of Control Center functionality". Levels of Non Compliance - Level 4 should read "two or more of the ten requirements".
030		M1	Documentation item number 4 from the Current P8 T1 is missing from M1.
031		R1	There appears to be missing items in this requirement as well as sections on "Regional Differences", "Compliance Monitoring Process", etc.
062	1	R1-1, R1-2	Transmission Planner should be added to Planning Authorities

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
062	1	M1-1, M1-2	Transmission Planner should be added to Planning Authorities

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
029		R-1 R-3 R-5	Add the following to the applicability of the requirement: TRANSMISSION OWNERS, GENERATOR OWNERS, GENERATOR OPERATORS, LOAD SERVING ENTITIES.
029		R-2	Change to "Adequacy, redundancy, reliability and applicability are determined by the requirements of applications such as RAIS, ICCP and IDC."

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Policy 7 — Telecommunications

Standard Version 04b Draft 1

[Geomagnetic Disturbance Reference Document] (DOES THIS DOCUMENT STILL EXIST?)

Policy Subsections

- A. Facilities
- B. System Operator Telecommunication Procedures
- C. Loss of Telecommunications
- D. Security

A. Facilities

[Appendix 7A —Telecommunications Between TRANSMISSION OWNERS, GENERATOR OWNERS, GENERATOR OPERATORS, LOAD SERVING ENTITIES, TRANSMISSION SERVICE PROVIDERS, TRANSMISSION OPERATORS, PARTICIPATING ENTITIES, OPERATING BALANCING AUTHORITIES, INTERCHANGE AUTHORITIES, -and RELIABILITY AUTHORITIES] *{Comment: Agree with Larry that we should specify the appropriate FM entities in lieu of using the term Operating Authorities. On a general note, I interpret this policy to extend beyond the ISN. Is this a correct interpretation? I think the answer impacts what entities we're talking about here.}*

Requirements

1. **Reliable and Secure Telecommunications Networks.** Each Participating Entity TRANSMISSION OWNERS, GENERATOR OWNERS, GENERATOR OPERATORS, LOAD SERVING ENTITIES, TRANSMISSION SERVICE PROVIDER, TRANSMISSION OPERATOR, BALANCING AUTHORITY, INTERCHANGE AUTHORITY, OPERATING AUTHORITY and RELIABILITY AUTHORITY⁺ shall provide adequate and reliable telecommunications facilities² internally and with other OPERATING AUTHORITY TRANSMISSION OWNERS, GENERATOR OWNERS, GENERATOR OPERATORS, LOAD SERVING ENTITIES, TRANSMISSION SERVICE PROVIDERS, TRANSMISSION OPERATORS, BALANCING AUTHORITIES, INTERCHANGE AUTHORITIES and RELIABILITY AUTHORITIES Participating Entities to assure for the exchange of INTERCONNECTION and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed. The NERC Telecommunications Manager and the Operating Reliability Subcommittee shall determine if each applicant complies with the AA adequacy, redundancy, reliability and applicability are determined by the requirements of applications such as RAGIS, ICCP, and IDC. each application's requirements. *{Think the added language helps to clarify, but not sure that it goes far enough to ensure the necessary transparency. However, it may be tough to get there without "changing" the policy intent.}*
2. **Interregional Security Network.** All RELIABILITY AUTHORITY RELIABILITY AUTHORITIES, AREAS and Participating ENTITIES TRANSMISSION OPERATORS, and BALANCING OPERATING AUTHORITIES shall participate in the Interregional Security Network as described in Appendix 7A, Section B, "Interregional Security Network," and provide the Operational Security Information as explained in Policy 4B, "Required Data Exchange." {Isn't this limited to RAs, BAs, and TOs?}

⁺ "Participating entity" refers to any system, operating, market or regional entity responsible for ensuring reliable and adequate system operations subject to NERC Operating Policy.

² "Telecommunications facilities" refers to all voice and data, wire and wireless facilities used for the exchange of information.

3. **Reliability of Telecommunications Facilities.** Vital telecommunications facilities shall be managed, alarmed, tested and/or actively monitored. Special attention shall be given to emergency telecommunications facilities and equipment not used for routine communications.

B. System Operator Telecommunication Procedures

Requirements

1. **Telecommunications coordination.** EACH ~~TRANSMISSION OWNERS, GENERATOR OWNERS, GENERATOR OPERATORS, LOAD SERVING ENTITIES, TRANSMISSION SERVICE PROVIDER, TRANSMISSION OPERATOR, BALANCING AUTHORITY, INTERCHANGE OPERATING AUTHORITY, and RELIABILITY AUTHORITY~~ ~~Participating Entity~~ shall provide a means to coordinate telecommunications among the systems in ~~the interconnected region that area~~. This coordination shall include the ability to investigate and recommend solutions to telecommunications problems within the ~~arearegion~~ and with other ~~regionsareas~~. *{It's unclear what "Area" is being referenced here. Is it the Reliability Authority Area? The Balancing Authority Area? The Interconnection?}*
2. **English language standard.** Unless agreed to otherwise, English shall be the language for all communications between and among SYSTEM OPERATORS and SYSTEM PERSONNEL responsible for the real-time generation control and operation of the interconnected BULK ELECTRIC SYSTEM. Operations internal to ~~the OPERATING AUTHORITY a TRANSMISSION SERVICE PROVIDERS, TRANSMISSION OPERATORS, BALANCING AUTHORITIES, INTERCHANGE AUTHORITIES BALANCING AUTHORITY AREA~~ may use an alternate language.

C. Loss of Telecommunications

Requirements

1. **Written instructions.** Each ~~TRANSMISSION OWNERS, GENERATOR OWNERS, GENERATOR OPERATORS, LOAD SERVING ENTITIES, TRANSMISSION SERVICE PROVIDER, TRANSMISSION OPERATOR, BALANCING AUTHORITY, INTERCHANGE AUTHORITY, OPERATING AUTHORITY and RELIABILITY AUTHORITY~~ ~~Participating Entity~~ shall have written operating instructions and procedures to enable continued operation of the system during loss of telecommunications facilities.

D. Security

Requirements

1. **NERCnet security.** ~~TRANSMISSION OPERATORS, BALANCING AUTHORITIES, OPERATING AUTHORITIES and RELIABILITY AUTHORITIES~~ ~~Participating entities~~ shall adhere to the requirements set forth in Appendix 7A, Attachment 2 – NERCnet Security Policy ~~and the NERC Cyber Security Standard~~ ~~Standard~~.

{Comment: Can NERCnet be described as a data exchange infrastructure that "houses" the ISN and other applications? If so, we need to include a listing of all FM entities that are impacted. Also, do we need a tie in to the Cyber Security standard (urgent action)?}

Appendix 7A — Regional and Interregional Telecommunications

Version 2

Appendix Subsections

A. NERC Hotline

B. NERCnet

Attachment 1 – NERCnet User Application Procedure and NERCnet User Application Form

Attachment 2 – NERCnet Security Policy

[Comment: This appendix contains quite a bit of “business practice” material (how to and process) with a few compliance items mixed in.]

A. NERC Hotline

This telephone network is ~~intended to be utilized~~ for emergency or near-emergency situations that involve or affect North American ~~interconnections~~ INTERCONNECTIONS and when time is a major factor in recognition, prevention, mitigation, or resolution of the emergency. The network consists of a preset conference call that interconnects RELIABILITY ~~COORDINATOR-AUTHORITY control~~ centers. ~~Dialing a preset conference telephone number actuates~~ The communication between Regions, is actuated by calling the preset conference telephone number. ~~This sets up the~~ initiating a conference call among the predefined participants.

B. NERCnet

Description

NERCnet is a network intended to provide an interregional data exchange infrastructure for entities subject to requirements under the Operating Policies as defined by the NERC Operating Manual. The network is designed to support multiple applications, addressing a variety of data exchange requirements, such as the Interregional Security Network, Interchange Distribution Calculator, Reliability Coordinator Information System, and others. All applications that expect to use NERCnet ~~must~~ shall follow the “NERCnet User Application Procedure”. (Refer to Attachment 1 of Appendix 7A).

All clients of NERCnet ~~must~~ shall agree to the NERCnet Security Agreement as signed by the President of NERC and an officer of the client’s organization. (Refer to Attachment 2 of Appendix 7A.)

The NERC ~~Telecommunications Manager~~ Telecommunications Administrator ~~is~~ shall be responsible for monitoring network activity and for reviewing, for verifying billing and usage statistics provided by the frame relay vendor.

Interregional Security Network

The Interregional Security Network (ISN) is a near-real-time data exchange application for the purpose of sharing operational security information. The data exchange requirements are explained in Policy 4B (System Coordination – Operational Security Information). The ISN is an Inter-Control Center Communications Protocol (ICCP) based application for exchanging operational security data over NERCnet.

ISN nodes reside primarily at RELIABILITY ~~COORDINATOR-AUTHORITY~~ sites. Each ~~CONTROL-AREA TRANSMISSION OPERATOR, BALANCING AUTHORITY, and RELIABILITY AUTHORITY OPERATING AUTHORITY~~ will/shall be responsible for supplying ~~their~~its data to an ISN node for retrieval by any authorized participant. ~~CONTROL AREAS, TRANSMISSION SERVICE PROVIDERS, TRANSMISSION OPERATORS, BALANCING AUTHORITIES, RELIABILITY AUTHORITIES, and INTERCHANGE AUTHORITIES~~OPERATING AUTHORITIES will/shall supply data to and retrieve data from the ISN nodes. *(This second sentence seems redundant.) {Comment: Isn't this exchange limited to RAs with BAs supplying the data to the ISN nodes? If so, don't think Operating Authorities should be used here.}*

Each ISN node shall be responsible for acquiring, installing, and maintaining the ICCP node hardware and database to support the ISN data requirements. ~~All ISN nodes will support the use of the OSI data transport protocol for ISN node to ISN node communications.~~

Attachment 1 – NERCnet User Application Procedure

Implementation and Responsibilities

NERC ~~will~~shall be the authorizing entity for any applications added to NERCnet. NERC ~~will~~shall advise the Data Exchange Working Group (DEWG) and Telecommunications Working Group (TWG) of any new applications.

Procedures

This procedure ~~will~~shall apply to all requests to add new applications, such as IDC, RAIS, and ICCPs and related network requirements to NERCnet.

1. The User or Sponsoring Group ~~must~~shall submit a completed NERCnet User Application Form to the NERC ~~Telecommunications Manager~~Telecommunications Administrator (see the form below).
2. If the User or Sponsoring Group has not already completed the NERCnet Security Agreement, the User or Sponsoring Group ~~will request a copy of the agreement and complete~~shall request a copy of the agreement, complete, and return it as appropriate.
3. The NERC ~~Telecommunications Manager~~Telecommunications Administrator ~~will~~shall review the form and determine if the form requires clarification, additional information, or must be resubmitted. Upon approval of the form the NERC ~~Telecommunications Manager~~Telecommunications Administrator ~~will~~shall forward the form to the NERC Operating Reliability Subcommittee (ORS).
4. ORS ~~will~~shall review the request to determine whether the new application is an appropriate use for NERCnet facilities.
5. If the ORS approves the application, the ORS chair shall sign the form ~~will be signed by the ORS chair~~ and returned ~~it~~ to NERC ~~Telecommunications Manager~~Telecommunications Administrator.
6. The NERC ~~Telecommunications Manager~~Telecommunications Administrator ~~will~~shall notify the requesting User or Sponsoring Group of the approval or denial of the request.
7. If the application is approved, ~~The~~ NERC ~~Telecommunications Manager~~Telecommunications Administrator ~~will~~shall forward the application form to the NERC DEWG and TWG chairmen for review:
 - The DEWG ~~will~~shall review the form and supply the data requirements, i.e., Data latency, bandwidth requirements, etc., then forward the form to the TWG.
 - The TWG ~~will~~shall ~~then~~ review the completed form and accompanying documentation to determine the design criteria required for the specific application. This ~~would~~includes such items as routers, local loop issues, management, and security requirements.
8. “The NERC ~~Telecommunications Manager~~Telecommunications Administrator ~~will~~shall contact the communication vendor to determine the cost, and provide the cost estimate to the NERC User or Sponsoring Group for cost allocation purposes and final authorization to proceed with design implementation. The NERC ~~Telecommunications Manager~~Telecommunications Administrator ~~will~~shall also provide a project schedule for network implementation.”

Appendix 7A — Regional and Interregional Telecommunications

9. The NERC ~~Telecommunications Manager~~ Telecommunications Administrator ~~will~~ shall oversee the daily activities related to network implementation for the approved application and report progress to the TWG as required.”

NERCnet User Application Form

Section A – Contact Information			
1. Submitter			
2. Contact name			
3. Mailing Address			
4. Telephone			
5. Fax			
6. e-mail address			
Section B – Application Information			
7. Network Connections needed by (date – M/d/yyyy)			
8. Application active by (date – M/d/yyyy)			
9. Protocol(s) required			
10. Bandwidth -- Normal		Peak	
Section C – Application/Network Security Application			
11. Data Confidentiality Agreement signed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
12. Is application server or client connected to Local Area Network?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Is application server or client connected to public Internet?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
14. How will non-NERCnet users access the application server (direct connection, dialup, etc.)			
15. Number of users or nodes			
16. Testing and implementation			
17. Attach brief description of the application.			

Internal NERC Use	
18. Response requirement	
19. Priority assigned	
20. If application uses TCP/IP are IP addresses to be assigned by network administrator?	
21. Date received by NERC	
22. Date forwarded to NERC Operating Reliability Subcommittee	

Definitions

Section A – Contact Information

1. Enter the identity of the entity making the request (~~e.g., NERC OASIS Standards Collaborative~~)
2. Enter the name of the person who will be the point of contact for this request.
3. Enter the postal address of the contact person
4. Enter the telephone number for the contact person.
5. Enter the fax number for the contact person.
6. Enter the e-mail address for the contact person.

Section B – Application Information

7. Enter the date when connections to NERCnet are needed. This should reflect the date the connection is needed for testing.
8. Enter the date this application is scheduled to be active, in a production environment.
9. Enter the protocol needed for this application (~~i.e., TCP/IP, OSI~~)
10. Enter projected data bandwidth requirements for this application for both normal and peak traffic loads.

Section C – Application and Network Security Information

11. If the applicant has not already signed the NERCnet Security Agreement, a copy shall~~ould~~ be requested from the NERC ~~Telecommunications Manager~~Telecommunications Administrator, signed, and returned with this application.
12. Indicate whether the server for this application is connected to a Local Area Network..
13. Indicate whether the server for this application is connected (directly or indirectly) to the public Internet.

If yes to either question 12 or 13, please attach a description of any firewall(s) (i.e. router with filters, hardware firewall, etc.) including a general description of the “access rules” enforced by the firewall. Also, please provide a diagram of your internal network showing the protection between the Internet or a Local Area Network and the proposed connection to NERCnet. For security reasons, network and firewall configurations should be supplied in hardcopy only via U.S. Mail. All network and firewall configuration data will be considered confidential. Access to these documents will be on a need to know basis only.
14. Identify how non-NERCnet users of this application will access the application.
15. Identify the intended users of this application (i.e., NERC RELIABILITY ~~COORDINATORS~~AUTHORITIES, OASIS Customers, etc.).
16. Identify any special circumstances required for testing, such as a connection to the application vendor or for implementation. Attach a brief description as appropriate.
17. Attach a brief description of the application. The description should elaborate on items such as any special connection requirements or data exchange requirements. If available, provide a copy of any User’s Manual and any procedures documenting node outage notification guidelines for the application.

Attachment 2 – NERCnet Security Policy

Policy Statement

The purpose of this NERCnet Security Policy is to establish responsibilities and minimum requirements for the protection of information assets, computer systems and facilities of NERC and other users of the NERC frame relay network known as “NERCnet.” The goal of this policy is to prevent misuse and loss of assets.

For the purpose of this document, information assets shall be defined as processed or unprocessed data using the NERCnet Telecommunications Facilities including network documentation. This policy shall also apply as appropriate to employees and agents of other corporations or organizations that may be directly or indirectly granted access to information associated with NERCnet.

The objectives of the NERCnet Security Policy are:

- To ensure that NERCnet information assets are adequately protected on a cost-effective basis and to a level that allows NERC to fulfill its mission.
- Establish connectivity guidelines to establish a minimum level of security for the network.
- To provide a mandate to all Users of NERCnet to properly handle and protect the information that they have access to in order for NERC to be able to properly conduct its business and provide services to its customers.

NERC’s Security Mission Statement

NERC recognizes its dependency on data, information, and the computer systems used to facilitate effective operation of its business and fulfillment of its mission. NERC also recognizes the value of the information maintained and provided to its members and others authorized to have access to NERCnet. It is, therefore, essential that this data, information, and computer systems, and the manual and technical infrastructure that supports it, is secure from destruction, corruption, unauthorized access, and accidental or deliberate breach of confidentiality.

Implementation and Responsibilities

This section identifies the various roles and responsibilities related to the protection of NERCnet resources.

NERCnet User Organizations

Users of NERCnet who have received authorization from NERC to access the NERC network are considered users of NERCnet resources. To be granted access, users ~~must~~shall complete a User Application Form and submit this form to the NERC ~~Telecommunications Manager~~Telecommunications Administrator.

It is the responsibility of NERCnet User Organizations to:

- Use NERCnet facilities for NERC authorized business purposes only.
- Comply with the NERCnet Security policies, standards and guidelines as well as any procedures specified by the data owner.
- Prevent unauthorized disclosure of the data.
- Report security exposures, misuse or non-compliance situations via SCIS-RAIS or the NERC ~~Telecommunications Manager~~Telecommunications Administrator.
- Protect the confidentiality of all user IDs and passwords.

- Maintain the data they own.
- Maintain documentation identifying the users who are granted access to NERCnet data or applications.
- Authorize users within their organizations to access NERCnet data and applications.
- Advise staff on NERCnet Security Policy.
- Ensure that all NERCnet users understand their obligation to protect these assets.
- Conduct self-assessments for compliance.

User Accountability and Compliance

All users of NERCnet ~~are required to become~~shall be familiar ~~with~~ and ensure compliance with the policies in this document and the NERC Cyber Security Standard.

Violations of the NERCnet Security Policy ~~may~~shall include, but not be limited to any act that:

- Exposes NERC or any user of NERCnet to actual or potential monetary loss through the compromise of data security or damage.
- Involves the disclosure of trade secrets, intellectual property, confidential information or the unauthorized use of data.
- Involves the use of data for illicit purposes, which may include violation of any law, regulation or reporting requirement of any law enforcement or government body.

NERCnet Security Agreement

Parties

This Agreement is between the NERCnet (North American Electric Reliability Council’s network) Client (“Client”) and the North American Electric Reliability Council (“NERC”).

Purpose

This Agreement is to help ensure the physical and logical security of the NERCnet telecommunications system and its applications and to ensure the proper performance of the applications that will rely on NERCnet for data receipt and delivery.

Premise

1. NERC has established a telecommunications system (NERCnet) to enable the exchange of operating information among TRANSMISSION SERVICE PROVIDERS, TRANSMISSION OPERATORS, RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, AND INTERCHANGE AUTHORITIES~~operating authorities~~. The operating information is critical to ensure the operating security of the INTERCONNECTIONS within NERC.
- ~~3.2.~~ The Client desires to establish and maintain a connection to the NERCnet telecommunications system for the purpose of exchanging operating information with other NERCnet clients.
- ~~4.3.~~ The Client understands that the integrity of the operating information and the NERCnet system are critical to ensure the operating security of the INTERCONNECTIONS within NERC.

Agreements

THEREFORE the parties agree as follows:

1. NERC authorizes connection of the Client to the NERCnet telecommunications system.
- ~~3.2.~~ The Client ~~wish~~shall submit its Telecommunications requirements, including data destinations and transmission rates and volume, to NERC for approval and network connection design.
- ~~4.3.~~ The Client ~~shall~~will maintain its connection to NERCnet in accordance with the policies and procedures established and modified from time to time by NERC, including any supplemental procedures established by the Client. In the event of a conflict between the Client and NERC procedures, NERC procedures will prevail.
- ~~5.4.~~ The Client ~~will~~shall take no action on the NERCnet that will in any way cause data supplied by other clients to be modified. The Client will ensure that its installation will be designed and operated in a manner that will not compromise the operation of NERCnet.
- ~~6.5.~~ The Client ~~will~~shall take no action that ~~will~~in any way impairs the operability of the NERCnet system itself.
- ~~7.6.~~ The Client ~~wish~~shall use NERCnet only for those purposes authorized by NERC.
- ~~8.7.~~ The Client ~~wish~~shall allow NERC to periodically review the Client’s connection interface. All connections (physical, logical, or virtual) to the NERCnet Interface to the Wide-Area Network ~~will~~shall be assessed, analyzed, and periodically reviewed by NERC, to ensure proper network utilization and design.
- ~~9.8.~~ NERC ~~wish~~shall not knowingly compromise the firewall of the client.

Appendix 7A — Regional and Interregional Telecommunications

~~10.9.~~ Any Client’s NERCnet connection that is judged by NERC to have a negative impact on the security or performance of other Clients’ applications ~~wish~~shall be changed to immediately remedy this negative impact. This ~~may~~shall include modification of the Client's physical, logical, or virtual connection or reduction or increase of the Client's transmission rates or volume, as required. At the Client’s request NERC ~~may~~shall propose a modified design that would support the Client's connectivity needs

~~11.10.~~ The Client ~~wish~~shall reimburse NERC for all costs associated with the Client’s NERCnet connection according to the cost allocation algorithm established for all NERCnet Clients.

Non-compliance

A NERCnet Client found not to be in compliance with this Agreement may be prohibited from continuing its connection to NERCnet. This prohibition may remain in effect until NERC determines that the NERCnet Client has resumed compliance with this Agreement.

Terms and Terminations

This Agreement shall commence immediately upon the signatures of an officer of the NERCnet Client’s organization and the President of NERC, and shall remain in effect until terminated by either party. Any NERCnet Client wishing to terminate this Agreement shall notify the President of NERC in writing of its desire to terminate this Agreement. Terminations shall be effective 30 days following acknowledgment of receipt of such written notice. Termination does not excuse the NERCnet Client from holding confidential any Operational Data obtained before the period has passed. Upon termination, the NERCnet Client will be prohibited from access to the NERCnet facilities. The Client shall be responsible for all costs associated with the termination and removal of its NERCnet connection.

Governmental Authorities And Other Agencies

This Agreement is subject to the laws, rules, regulations, orders and other requirements, now or hereafter in effect, of all regulatory authorities having jurisdiction over the NERCnet Client. All laws, ordinances, rules, regulations, orders and other requirements, now or hereafter in effect, of governmental authorities that are required to be incorporated in agreements of this character are by this reference incorporated in this Agreement.

General

This Agreement constitutes the entire and only agreement between the Client and NERC and all other prior negotiations, representations, agreements, and understandings are superseded hereby. No agreements altering or supplementing the terms hereof may be made except by means of a written document signed by the duly authorized representatives of the parties.

For NERCnet Client

Signature of Officer Date

For NERC

Signature of President Date

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Save the changes for Version 1.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Other agreements address these obligations.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Only reviewed Operating Standards.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Only reviewed Operating Standards.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		R4	The proposed change to the deviation threshold is an improvement of the current straight 25%, however, the 10 MW threshold for transactions of 100 MW or less is too small for most load following type dynamic schedules. 10 MW is not a significant error for most load forecasts and these swings do not have much impact on the BAs. Increasing the threshold to at least 25 MW may be more appropriate.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

TXU Electric Delivery has not found any show stoppers that would prevent it from approving the standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

TXU Electric Delivery agrees that on the whole Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules. However, TXU Electric Delivery does propose several necessary modifications in the table below.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

TXU Electric Delivery suggests that what may seem like a clarification or duplication may not be so in some cases and therefore prefers that the Drafting Team minimize the changes to simplify the transition from existing rules to Version 0, especially since all of the changes to the current requirements have been vetted through the existing change process that would suggest that all of the existing requirements were implemented for valid reasons.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

However there are some points where TXU Electric Delivery proposes changes, especially relating to voltage/reactive requirements. See comments on individual standards and requirements below.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

TXU Electric Delivery agrees that explicitly including these other functions as appropriate will be helpful in the development of agreements or working with such entities because this will lend clarity to the responsibilities or requirements of each entity.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

As a whole, TXU Electric Delivery agrees with this allocation of potential business practice standards but specific proposed changes are described in the table below.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

TXU Electric Delivery has no suggestions for additional business practices.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

TXU Electric Delivery generally agrees with this approach however in certain situations more clarification may be necessary to describe appropriate delegation or sharing of duties in areas that have seams issues.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

TXU Electric Delivery takes no position on this issue.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
003	Operating		The deletion of governor-related items (Policy 1.C) can contribute to decline on frequency response performance and potentially degrade reliability.
004	Operating		With respect to any time correction control actions, Reliability Authority needs to be informed as this may need to be recognized in ACE and CPS determinations (See Standard # 005).
006	Operating		With respect to any Inadvertent Interchange payback control schedules, Reliability Authority needs to be informed as this may need to be recognized in ACE determinations (see Standard # 005).
009	Operating		Both existing Policy and Functional Model appear deficient with respect to responsibility for voltage/reactive support. It appears that Version 0 attempts to address this somewhat. See following suggested changes.
009		R1	Add Generation Owner as an entity that also provides voltage support as stated in the Functional Model. Balancing Authority is another entity that should also be added to R1.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
009		R3	Version 0 includes Balancing Authority even though not found in the Functional Model but this is advantageous because it helps address aforementioned deficiency.
009		R5	Add the Balancing Authority as in R1 & R3. Also add "as directed by Reliability Authority" to the end of R5.
009		R6	Add Balancing Authority as in above Requirements.
009		R7, R8, R10, R11	Add Reliability Authority for its role in overall reliability coordination even though existing Functional Model omits this aspect with respect to voltage/reactive support.
014		R4	In answer to the question under "Comments", load forecasting is required for reliability. For example, with forecast load information, potential overloaded facilities can be identified given expected transmission configuration when evaluating future grid operating requirements.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014		R7	It is not necessary to require Transmission Operator to monitor frequency if the Reliability Authority is responsible for directing emergency actions.
015		R4	Typographical error: The second "and" in the last sentence of this requirement is not necessary.
015		R2	TXU Electric Delivery agrees that Electric System Security Data should not be made available to Purchasing/Selling entities in the wholesale merchant function.
018			Policy 5.A.3 that addressed unknown operating states has been incorrectly omitted from the Version 0 Standards. TXU Electric Delivery suggests including that Policy in the Version 0 Standards to achieve a correct translation.
019		R2	Balancing Authority and Transmission Operator should only have to notify the Reliability Authority. That Reliability Authority would then provide other notification as needed.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		R1	The original Policy language stated that NERC-certified staffing should occur for positions that meet both criteria while changing the Version 0 Standard to say "either" changes the intent of the original policy. TXU Electric Delivery proposes that the Version 0 require meeting both criteria and any changes should be taken up with the development of Version 1.
039			The majority of Policy 9.C.1.1 seems to have been omitted from the Version 0 Standards and a comment box in the Operating Policies Markup asks whether potential SOLV's can be forecast. Version 0 should not omit these requirements. Potential SOLV's can be identified. Version 1 should address and clarify concerns expressed in comment box.
051		R2-1	Item no. 10, under subheading System Simulation Study/Testing Methods, should be changed to read: 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.
051		R3-1	Same as R2-1 above.
051		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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
055		Applicability	Add exemption language as follows: (Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard.)
056		Applicability	Add exemption language as follows: (Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard.)
062	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.
064	1		This Section appears to be unnecessary, since it is covered by Standard 051.
064	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
064	2		(Continued from previous page.) 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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

TXU Electric Delivery proposes that existing Policy requirements that appear to be duplication may not always be actual duplications. Therefore, TXU Electric Delivery proposes that it is better to leave potential duplications in Version 0 and let the development of Version 1 evaluate the treatment of these items. Mapping from Control Area or Control Authority to Functional Model equivalents is not always straightforward and sometimes reveals Functional Model shortcomings or areas that need clarification. Such issues should be addressed in the development of Version 1 (and possibly with Functional Model Changes).

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		R4	Drafting Team proposal for Dynamic Schedules: Make the low MW schedule cutoff for an allowed 10MW deviation 40 MW rather than 100 MW. This maintains the 25% allowed deviation down to 40 MW rather than changing it abruptly to ~10% for a schedule just below 100 MW.
014		R4	Drafting Team Comment: Load forecasting should be required for reliability, although a TO should not be required to forecast load..
017		R5	Drafting Team Comment: The Generator Operator should report through its Balancing Authority or Transmission Operator.
019		R1	Drafting Team Comment: A Generator Operator needs to have equipment for communications with RA, BA, or TO as appropriate.
024		R10	Drafting Team Comment: Not necessary. Covered by R6.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R18	Drafting Team Comment: It is not necessary to add this requirement to the prior requirements.
025		R5	Drafting Team Comment: The "must" statements should be included.
026		Purpose	Drafting Team Comment: Load shedding implementation requirements should be moved to other standards focused on emergency operations.
027		R4	Drafting Team Comment: It is appropriate to specify that restoration plans should have as a priority restoring the integrity of the interconnect.
040		Purpose	Drafting Team Comment: Restoration planning and implementation should be in separate standards.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

In many instances, multiple parties are lumped together in requirements where only a part of the requirement applies to them. For example: Standard 014 R4 the TO should not be responsible for load forecasting, Standard 021 R1 the BA is not responsible to determine if an IROL is being exceeded, Standard 024 R6 the BA is not responsible for system configuration. The standards need to be written so that the requirements are directed to the proper entity only.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

We have concerns about the inclusion of some of the Phase 3 and Phase 4 Planning Standards being included in the Version 0 Standards. Please see our response to Questions 11 and 12.

Additionally, we question the lack of Measures, Compliance Monitoring Processes and Levels of Non-Compliance for many of the standards. Standards that are not written with compliance monitoring and measurement in mind will result in standards that are no more effective than existing NERC Operating Policy.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

We agree given the changes indicated.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

The elimination of redundancies should be addressed in Version 1.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Entergy believes that there may be no real reliability reason for time error corrections to continue. Additionally, it seems to be questionable that changing the scheduled frequency of an Interconnection should be governed by a business practice. We would prefer for the practice of time error correction to be discontinued. If time error corrections continue, Entergy agrees that the Reliability Authority needs to have the ability to halt a time error correction for reliability reasons.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

The ATC and CBM portions of the I.E1 and I.E2 measurements address business practices and should be deleted from Version 0. The TTC and TRM portions of the I.E1 and I.E2 measurements address reliability issues and should be retained in Version 0.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

We agree with this approach so far. However, we are concerned about the existing conceptual framework of the Functional Model in contrast to the assignment of some of the transmission reliability functions contained in Policies 2, 5, and 6 to Transmission Operators and Transmission Service Providers in the draft Version 0 Standards. This assignment of functions, functions that were contemplated by the Functional Model to be performed by the Reliability Authority, enables the current Policies to begin to adapt to the terminology of the Functional Model, yet leaves the Functional Model in conflict with the Version 0 Standards. We suggest the Functional Model Review Task Group work with the Version 0 drafting team to actively resolve the Model language to match the Version 0 Reliability Function assignments.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

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During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Comments

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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			Please see file "NERC_Version_0_Standards_Draft1_Entergy Comments Part B 08-09-04.doc" for Entergy's responses to Question 13.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

We are very aware that NAESB and NERC standards development teams are attempting to coordinate their efforts and assure the resulting standards will function properly. We hope the two organizations continue coordinating their effort and that industry participants ensure they do continue that coordination.

We commend the authors of the NAESB and NERC draft standards for utilizing a planned transition to remove commercial issues from the reliability standards and into commercial business practices. We also suggest the industry ensure there is little or no overlap of NAESB and NERC Version 0 standards.

We also have the following comments and suggestions:

- Regional Reliability Councils are referred to in the Standard whereas these are not in the Functional Model. It is more appropriate to replace these by Reliability Authority or other appropriate entity mentioned in the Functional model. In many cases the appropriate entity performing Compliance Monitoring should be the Compliance Monitor, not the Regional Reliability Council.**
- It appears to be that expectations rather than requirements are included in the standards. Some expectations or clarifications may be in the standard but most of these could be included in the supporting documents. These need to be looked at on case by case basis.**
- More attention needs to be placed on Measures and compliance measures. Next version should include these and be consistent.**
- All capitalized terms should be defined either in the standard or in glossary somewhere.**
- There are numerous reference to external documents, some of these documents may not be part of the standard. The current version of these documents should be made part of the standards.**
- Levels of non-compliance should have its own non-compliance sanctions rather than reference to general non-compliance template applied to all standards. Alternatively, there could be a separate standard of non-compliance tables, standards can refer to the tables in that standard.**
- All figures should be labeled and referenced properly in the standards.**
- Punctuation and grammatical mistakes are prevalent throughout the standards.**
- The references are incorrect at several places in the document. These need to be reviewed and corrected.**
- Existing references included in the document are not complete, e.g. mention is not made to the training document at several places.**
- Reference to Business Days in the Standards is not appropriate in all instances. For example, 30 days should be more appropriately referred to as 30 days rather than 30 Business Days. Reference to less than 2 weeks should refer to Business Days, like 5 or 7 Business Days rather than 5 or 7 Days. These were also not referred to appropriately in the original standard.**
- Compliance Monitoring Process should allow Self Certification where ever it is feasible.**
- System Operators referred to in Operating Policies are referred to as operating personnel in the standards. Operating personnel can be anyone related to the operations, therefore, their responsibilities should be defined if we want to include these in the standards.**

**DETAILED ENTERGY COMMENTS ON
NERC VERSION 0 STANDARDS - DRAFT 1
Part 2 of 2
8-09-04**

No.	Title	Comments
001	Real Power Balancing Control Performance	<ul style="list-style-type: none"> • Supplemental regulation service is not clearly included in Requirements yet it is referenced throughout the other standards (M2). • Resources Subcommittee is still referenced in the standard at some places and is replaced by NERC Operating committee at others – needs to be consistent. • Language in the standard appears to be cut and pasted from the policy but at several places there is not good flow of expressions. • Measure 2 refers to defining of L₁₀ in Standard 002, but it is neither defined there not it should have been defined there. The reference should have been to R-2. • M1 includes lot of explanation that can be either in the supporting document of appendices. • M1 language refers to the reporting entity should refer to the Balancing Authority. The language “shall be able to” does not necessarily indicate as requirement for the standard. • Entergy disagrees to remove Compliance Monitoring Process from Version 0 standard. • Compliance Monitoring Process includes “On a regular basis...”which appears to be vague. Entergy recommends that it should be removed. • Levels of Non Compliance still refers to Control Area which should be replaced by Balancing Authority.

No.	Title	Comments
002	Disturbance Control Performance	<ul style="list-style-type: none"> • R2 is very confusing, needs to be cleaned up. • Reserve Sharing Group is not a defined entity in Functional Model. • R2 does refer to Policy 1B Requirement 1.2. • R5 refers to P1B , 3.3.2 and 3.3.2, it should refer to 2.3.2. • M1 under Determination of ACE_A refers to the illustration to the right, it is not clear which illustration it is referring to. • ACE_M defined twice in M1 is incorrect and its use is confusing. Entergy suggests that it should be defined as ACE_{max} and ACE_{min}. • The words “disturbance, i.e. $ACE_m = ACE_{15\ min}$ “ was omitted from the last sentence (performance Standard Reference Document C 2.3). • The graph at the end of M1 is inadequately labeled. Either this should be fixed or the illustration should be removed. • Data Retention section still refers to Control Area which should be replaced by Balancing Authority. • Are Supporting Notes expected to be part of the standard? If they are, these do not appear to be written as requirement. • The references in Supporting Notes needs to be corrected. Document refers to 3.4, 3.5.1, 3.5.2, and 3.5.3, these references should be 2.4, 2.5.1, 2.5.2, and 2.5.3. • The whole section of Multiple Contingencies within the Reportable Disturbances need to be more clear. Reasonable estimation of the response leaves the requirement left to interpretation. • Regions referred to in the Supporting Notes needs to be replaced by the defined entity in the Functional Model. •

No.	Title	Comments
003	Frequency Response and Bias	<ul style="list-style-type: none"> • R1 should refer to Balancing Authority Area in place of area in “...area frequency response characteristic”. • Tie-line frequency bias and tie-line bias are used interchangeably. Either the term should be defined or it should used consistently. • Supplemental Regulation service is referenced which was removed from 001. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. • There are 2 sections for Levels of Non Compliance in the Standard – it is not clear if it was intentional or inadvertent first draft issue.
004	Time Error Correction	<ul style="list-style-type: none"> • Entergy believes that there is no need for time error correction. The time error correction procedure does not have any reliability or commercial impact in the current environment. This procedure should be eventually phased out and not included in the standards or business practices. • In case this standard is kept - This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.

No.	Title	Comments
005	Automatic Generation Control	<ul style="list-style-type: none"> • The purpose included in the standard is confusing. AGC is not needed to calculate ACE. • R6 redefines ACE calculations unnecessarily. • R7 contains percentage that should be included in the measure. It also does not indicate how it should be measured. • R11 requires Balancing Authority to ensure that MWh data is telemetered and reported at the end of the hour. It is included in standard 006 and also is not relevant to this standard. Therefore, this reference should be removed from this standard • Provisions in R14 should be in the measures rather than requirement. • R15 refers to checking and calibration of time error correct devices. Since Entergy proposed to remove time error correction requirement, this requirement should delete reference to time error correction devices. •
006	Inadvertent Interchange	<ul style="list-style-type: none"> • Purpose makes reference to inadvertent data which should refer to Inadvertent Interchange data. • Comment column of R5 indicates that a separate dispute resolution procedure not be maintained. It is not clear which separate DRP is team referring to? • Reference to Appendix 1F in R5 is not appropriate. This may have been taken from the original policies and needs to be corrected. The reference should also be included in the standard, if needed. • Levels of Non Compliances are incomplete.
007	Transmission Security	<ul style="list-style-type: none"> • Drafting team should not leave the requirements that are vague. (SDT comment regarding multiple contingencies). They should take this opportunity to clarify these requirements or leave these out • The purpose statement should include “or” rather than “and” before specified multiple contingencies. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.

No.	Title	Comments
008	Reporting System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) Violations	<ul style="list-style-type: none"> • The standard is titled for reporting the violations, Entergy proposes that this standard should be titled as return from SOL and IROL violations • R5 is more appropriate as measure rather than requirement. R1 – R4 can be requirements and R5 should be measure. • There is still reference to Control Area in the Measure section which should be changed to Balancing Authority. • Applicability should include Reliability Authority and Regional Reliability Organizations in addition to Transmission Operators and Balancing Authorities or the requirements should not refer to Reliability Authority and Reliability Regional Organization as included in R1, R4 and R5. • R5 is inconsistent with the Compliance Monitoring Process with respect to reporting process to NERC. Entergy suggest that R5 should not include reporting to NERC by the RA.
009	Voltage and Reactive Control	<ul style="list-style-type: none"> • Policy 2B, Requirement 5 includes more entities than included in R10. There should be more specific responsibilities for each entity rather than general responsibilities for a group of entities. • Entergy proposes R10 to include “Transmission Operator shall take corrective action including directing the BA to reduce load if necessary to prevent voltage collapse when reactive resources are insufficient.” • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. •

No.	Title	Comments
010	Interchange Transaction Tagging	<ul style="list-style-type: none"> • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. • Entergy supports having the requirement to submit a tag, and the minimum timing of such submission as a reliability standard, due to the importance of accurate scheduling to reliability. • The existing measure should be designated as M1, and another measure added. The additional measure, M2, should measure how well the PSE followed the requirements of this standard. M2: A PSE shall meet 100% of the tagging requirements for all scheduled interchange for which it is responsible, and do so in a timely manner. • The monitoring process for this standard should be a tag survey when requested by the OC, during a compliance or readiness audit or investigation of unusual conditions. • Concerning Levels of Non-Compliance: M1 should be based upon the number or percentage of non-tagged transactions. M2 should be based upon either the number or percentage of non-tagged transactions, or upon the number of late tags submitted. • The correct reference for R3 is Requirement 2.1 rather than 2.4.1 • Attachment 1 still refers to Policy and Sections, these references should be corrected to point to standards. • In the text below the Eastern Interconnection timing requirements table: Tags representing TRANSACTIONS that run for less than (instead of that) one day... • Tags submitted that meet these requirements shall be considered “on-time” by the E-Tag system and may be passively approved (instead of “and may be granted conditional approval”)

No.	Title	Comments
011	Interchange Transaction Tag Communication and Reliability	<ul style="list-style-type: none"> • R1 should also include PSE, Generator Owners and Load Serving Entities. • R4 is left out. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. • Either the Reliability Authority should be included in the applicability section, and have a requirement describing the criteria for assessing interchange transactions prior to approval, or the Reliability Authority should not be included in Requirement R1 as one of the entities who is to be provided the tag for assessment. • R1: Having the RA and the Security Analysis Service as entities to receive the interchange transaction is redundant if the RA is supposed to receive the transaction via the IDC. If the RA is to have approval rights, the RA should receive the transaction prior to approval. If the RA is provided the tag for information purposes only, after approval by the other entities has been completed, the RA does not need to be included in R1. • R2: OASIS reservation accommodates multiple Interchange Transactions. This is not clear. Should be reworded to indicate that the transmission reservation indicated on the tag must be sufficient to accommodate the energy profile of all interchange transactions that use that reservation in aggregate.

No.	Title	Comments
011 Contd.	Interchange Transaction Tag Communication and Reliability	<ul style="list-style-type: none"> • Compliance Monitoring Process: The BA, or TO is 100% compliant with this standard when they provide documentation of their approval criteria for interchange transactions, and documentation of their approval process. This should be done during the compliance or readiness audit, or during an investigation. • Levels of Non-Compliance: The BA or TO would be non-compliant based on either their lack of documentation for their approval criteria, or their inability to demonstrate that they have an approval process that is used. Probably there would only be two levels of non-compliance needed for this standard.

No.	Title	Comments
012	Interchange Transaction Implementation	<ul style="list-style-type: none"> • AGC should be removed from the Purpose statement. • R1: it seems unnecessary to have both “the Balancing Authority’s AREA CONTROL ERROR equation or in the system that calculates that Balancing Authority’s AREA CONTROL ERROR equation.” Either the BA’s ACE, or the system that... would be adequate to convey the meaning of the sentence. • R1: In the discussion of default ramp rates, there should be some indication that the Balancing Authorities can agree to a ramp duration other than the default. In sub-bullet (c), the text should be changed to indicate that ramp durations may be shorter than the default but must be identical <u>and agreed to by</u> the sending and receiving Balancing Authorities. • The references in the document are offset. R1 © should refer to Policy 3 Requirement 3.4, last bullet in R1 should refer to Policy 3B, Requirement 4.1.3, and so on. • Existing Document Reference for R3 should be Policy 3A Requirement 6. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. • Compliance Monitoring Process: Entergy proposes: M1 - The BA can provide documentation that agreements are in place with neighboring Bas as to how schedule confirmation will be performed. M2 - The BA can provide evidence showing that for a random sample of X hours, confirmation was performed according to agreements before the schedule change began. These could be done via self-certification, during the compliance or readiness audit, or in response to an investigation.
012 Contd.	Interchange Transaction Implementation	<ul style="list-style-type: none"> • Levels of Non-Compliance: Entergy proposes: For M1, level 1 would be process in place but not documented, level 4 would be no process in place. For M2, the level of non-compliance would be related to either the number or percentage of schedules not confirmed during random sample.

No.	Title	Comments
013	Interchange Transaction Modification	<ul style="list-style-type: none"> • R1 provides that a Generator Operator or LSE may request the HOST BA to modify an interchange transaction, this does not appear to be a requirement. Therefore this should not be a part of the requirement. • Existing Document Reference for R1 should be Policy 3D requirement 2. • R2: Both the Source and Sink BA are responsible for implementing the required modifications, not just the Sink. Also, the Sending and Receiving Balancing Authorities should be responsible for re-confirming their interchange schedule when a modification takes place. This requirement should also include the fact that all Balancing Authorities, Transmission Service Providers, Reliability Authorities (if these are to be included in standard 011), and Security Analysis Service are to be notified of the modification as soon as possible. • R3: Should include the requirement that the Source and Sink BA are responsible for reloading the transactions, that the sending and receiving BAs should re-confirm upon receipt of the reload instruction, and that all the Balancing Authorities, Transmission Operators, Reliability Authorities (if these are included in standard 011) and Security Analysis Service are to be notified of the reload as soon as possible.

No.	Title	Comments
013 Contd.	Interchange Transaction Modification	<ul style="list-style-type: none"> • R4: The proposed language is superior to the language in the current version of Policy 3. Entergy supports changing R4 to include the following as proposed by the Version 0 drafting team. “A Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall modify the tag when the energy profile deviates from the previously tagged profile as follows: the transaction is 100 MW or less and the deviation is more than 10 MW; or the transaction is greater than 100 MW and the deviation is greater than 10%.” This change takes into account that some dynamic schedules have more impact than others on the interconnection because of their magnitude. Whatever the revised language, if R4 is to be a piecewise function, it must be continuous. The language proposed by the Drafting Team creates a discontinuity (e.g., the threshold for a 99 MW tag is 10 MW’s, but the threshold for a 100 MW tag is 25 MW’s). Either the fixed threshold for small tags should be changed to 25 MW’s with a 25% variable threshold for large tags, or the variable threshold for large tags should be changed to 10% with a fixed threshold of 10 MW’s for small tags. Again, Entergy proposes the latter. • R5 should not be limited for submitting the modification to sink BA but to all entities referred to in Policy 3D Requirement 1.5. • Existing Document Reference for R3 should be Policy 3D requirement 2.3.2. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.

No.	Title	Comments
014	Monitoring System Conditions	<ul style="list-style-type: none"> • Entergy does not agree with the approach of assuming that the Generator Operators and other functions are obligated through agreements or connection requirements. If requirements are needed for reliability these should be included in the standard. • R1 requires Transmission Operators and BAs to inform RA and affected Bas of the generation and transmission resources available. TO and Bas can make only that generator information available which they have received from the Generator Operators.. • R4 requires multiple entities for the information. Entergy suggests that the standard should have more specific responsibilities assigned to each entity. • Load Forecasting is an important function for reliability. • R7 requires monitoring of system frequency, but there is no requirement of how much (i.e. 60 Hz) system frequency should be maintained. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.
015	Operational Reliability Information	<ul style="list-style-type: none"> • The Requirement 1 Policy 4B should be reflected in R2 in addition to Requirement 2 Policy 4B. • NERC Confidentiality Agreement for Electric System Security Data should be included in the Existing Document References. • Measures should make reference to Bas and/or Transmission Operators in addition to RAs for agreed upon format. • The above comment will also apply to levels of non-compliance. • Compliance Monitoring Process should indicate that there will be an operational review at least once every 3 years. • R4 has an extra “and after “Transmission Operator” and before “shall provide the types...” • Even though existing Policy 4 Requirement 6 refers to host Control Areas for PSEs, in reality there may not be any host Bas for PSEs. SDT should consider changing PSEs to appropriate entities such as Generator Operators, LSEs etc.

No.	Title	Comments
016	Planned Outage Coordination	<ul style="list-style-type: none"> • R1 - The Generator Operators and Transmission Operators may not have wide area view to know which outages will contribute to SOLs and IROLs. Long sentence is very confusing and needs to be broken up clarified. It needs to be clarified when the outage information needs to be provided to the neighboring Balancing Authorities and Transmission Operators. • R4 – RA should resolve any potential-outage scheduling conflict. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.
017	System Protection Coordination	<ul style="list-style-type: none"> • R5 - In the case of System protection, the hierarchy should be to report any changes to the system protection to Transmission Operator. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.

No.	Title	Comments
018	Reliability Responsibilities and Authorities	<ul style="list-style-type: none"> • Consider adding the word “Emergency” to the title of the standard. The standard applies only to emergency operations, but this is not easily understood without reading the body of the standard. • There is a comment from the drafting team asking if the Generator, distribution provider, and LSE requirements should be included in the standards or if they should be addressed through service agreements. Response: If a given action is needed to ensure reliability, it should be governed by the reliability standards • Entergy does not agree with the approach of assuming that the Generator Operators, LSEs, and Distribution Providers are obligated through agreements or connection requirements. If requirements are needed for reliability these should be included in the standard. • R3: Add Market Operator to the list of Operating Authorities responsible for complying with reliability directives. • R4: It is confusing to have a list of several operating authorities responsible for notifying other entities. For instance, the standard should specify that the local Reliability Authority will handle all communications with other potentially impacted Reliability Coordinators. These requirements as currently written could lead to multiple notifications and potential confusion as to exactly what action is going to happen or has already taken place. • R5 – The statement “ provided that the entity has implemented.....” is difficult to verify and places the responsibility on the party rendering assistance, which is not fair. • R5: Add Market Operator to the list of Operating Authorities that shall render all available emergency assistance requested. • Entergy suggests that the requirement should be added that the party needing assistance should implement their emergency procedure before requesting assistance.

No.	Title	Comments
018 Contd.	Reliability Responsibilities and Authorities	<ul style="list-style-type: none"> • R6: Similarly to my comment on R4, the local Reliability Authority should be the entity to coordinate communications with other potentially impacted Reliability Authorities. In this requirement as well, there are multiple entities that are responsible for notifying and coordinating. This may create confusion and should be more clearly written. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.
019	Communications and Coordination	<ul style="list-style-type: none"> • R1 – reference to staffing of communication appears to be referring to the communication facilities, therefore, it should be referred to as communication facilities. Entergy believes that the Generator Operators should be required to have communication equipment. • Staffing of communication facilities is not clear whether it means the control room operators or the staff supporting the communication facilities? • R3 is not included. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. •
020	Emergency Operations/Implementation of Capacity and Energy Emergency plans and coordination with other systems.	<ul style="list-style-type: none"> • M1 references Regional Reliability Council which should be changed to Reliability Authority in accordance with the NERC Functional Model.

No.	Title	Comments
021	Emergency Operations Transmission	<ul style="list-style-type: none"> • R1: Having both the Balancing Authority and the Transmission Operators as responsible entities makes sense, since each of them can impact SOL/IROL conditions on the transmission network. It is not clear, however, how the Balancing Authority will know what to do or when to do it unless directed by the Transmission Operator or the Reliability Authority. In fact, independent operation to manage SOL/IROL conditions on the transmission network without explicit direction from the Transmission Operator or Reliability Authority would seem to be counter productive if not downright dangerous • Mitigation measures such as Load Shedding should be included in this standard rather than Standard 026.
022	Disturbance Reporting	<ul style="list-style-type: none"> • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard
023	Sabotage Reporting	<ul style="list-style-type: none"> • R1 and R2 references operating personnel while the Policy refers to system operators (are operating personnel the same as system operators). Operating Personnel are more general, if we want to include operating personnel, their responsibilities should be defined. • Guide 1 from the policy is not referenced in the standard. This is an important requirement for reporting to the media and should be addressed. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard

No.	Title	Comments
024	Normal Operations Planning	<ul style="list-style-type: none"> • R2 references operating personnel while the Policy refers to system operators (are operating personnel the same as system operators). • R2 does not consistently refer to operating personnel (system operating personnel is also referenced). • R4 and R5 are confusing. Sounds like the same information repeated over and over. • Entergy supports the requirement R10 as it very important that all Generator Operators operate their plants so as to adhere to ramp schedules. • Entergy agrees that R18 should be added to each applicable requirement above rather than creating additional requirement. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard
025	Emergency Operations Planning	<ul style="list-style-type: none"> • No reference for R1 (reference is Policy 6B Requirement 1). • R5 - Entergy believes that the P6T1 requirements should be included in the standard as requirements. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard

No.	Title	Comments
026	Load Shedding Plans	<ul style="list-style-type: none"> • The purpose statement of this standard needs to be revised to include only the Load Shedding Planning and not implementation. Entergy proposes that the implementation of Load Shedding should be included in the Transmission Emergency Operations Standard 021. • R1 should be restated as a Load Shedding Plan rather than operation. • Entergy proposes that R4, R5, R6 should be moved to Standard 021. • R7 – add plans after shedding in the second sentence. • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard
027	System Restoration Plans	<ul style="list-style-type: none"> • Entergy agree with R4 drafting team comments that the requirement should not only include the intent of restoring the integrity but should have priority restoring the integrity of the interconnection.. • On the Levels of Non Compliance – Entergy believes that Level 3 should have the following language, “Plan exists but does not address two or more of the nine requirements”, and that Level 4 should have the following language, “Restoration Plan does not exist”.
028	Plans for Loss of Control Center Functionality	<ul style="list-style-type: none"> • Purpose does not make sense. Needs to be rewritten.
029	Telecommunications	<ul style="list-style-type: none"> • R2 – The statement “ Special attention shall be given to” is same as in the policy, but for the purpose of standard this is not measurable and the sentence should be reworded. • R3 – AREAS is emphasized but why? • R4- Improper grammar: Unless agreed upon otherwise... • R5 and R6- The document does not include Existing Document References, they represent existing documents 7c and 7d respectively? • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard.

No.	Title	Comments
030	Operating Personnel Responsibility and Authority	<ul style="list-style-type: none"> • Applicability should include Generator Operators. • M1 – Insert “have the” in between personnel and responsibility in first paragraph. • The Data Retention requirement for this standard should be 1 year. The probability exists that over time, the job description and perhaps other documentation will be modified. There should not be a requirement to keep past versions of authorizing documents for an unlimited period of time.
031	Operating Personnel Training	<ul style="list-style-type: none"> • Applicability should include Generator Operator. • R1 – There should be a measure for verification of the training achievement • R1 – There is no Attachment 1 as referred to in this requirement. • Should have an M2 indicated that training records shall be reviewed to ensure that the required 40 hours of training and drills in system emergencies was provided. There should also be levels of non-compliance associated with failure to meet the standard R2.
032	Operating Personnel Credentials	<ul style="list-style-type: none"> • Purpose – “minimum competencies” does not appear appropriate for the standard. The statement should be reworded. • In the NERC Operating manuals Bulk Electric System is defined as the aggregate generating plants, transmission lines and related equipment..... Therefore, the applicability should include Generator Operators. • The requirement and measure do not differentiate between levels of certification. For example, as currently written an operator holding a Transmission Operator Certificate could work in a Balancing Authority, or Reliability Authority position since he is “NERC Certified.” As a minimum, to work in a Balancing Authority the operator must have either a valid Balancing Authority Certificate, Combination Balancing-Interchange-Transmission Certificate, or Reliability Certificate. • There should be a similar requirement for Transmission Operators to hold either a Transmission Certificate, Combination Balancing-Interchange-Reliability Certificate or Reliability Certificate, and for the Reliability Authority Operator to hold a Reliability Authority Certificate.
033	Reliability Coordination – Responsibilities, Authorities, and Agreements	<ul style="list-style-type: none"> • No Comments

No.	Title	Comments
034	Reliability Coordination – Facilities	<ul style="list-style-type: none"> • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. • R2 – All entities from whom the RA requests information should be obligated to supply it. • Entergy agrees with the SDT comment that RA will share information with RAs. • R3- Transmission Operators and Balancing Authorities do have obligation to supply information to Reliability Authority through the NERC SDX. • R3 - Attachment A referred to in the SDT comment is not clear. • R5 – the phrase “giving particular emphasis to alarm management.....” is not measurable and the sentence should be reworded. • Applicability should include all entities that supply information for reliability coordination, such as Transmission Operators, Generator Operators, Balancing Authority etc. • Requirement should include that the entities
035	Reliability Coordination – Wide Area View	<ul style="list-style-type: none"> • This standard does not include Measures, Compliance Monitoring Process, Levels of Non-Compliance in the current draft. It is not clear if these are not identified in the current draft and will be included in the later draft, or these need not be identified. Entergy suggests that these should be identified and included in the standard. •
036	Reliability Coordination – Staffing	<ul style="list-style-type: none"> •
037	Reliability Coordination – Operations Planning	<ul style="list-style-type: none"> •
038	Reliability Coordination – Current Day Operations	<ul style="list-style-type: none"> •
039	Reliability Coordination – Transmission Loading Relief	<ul style="list-style-type: none"> •
040	Reliability coordination – System Restoration	<ul style="list-style-type: none"> •

No.	Title	Comments
051	Transmission System Adequacy and Security	<ul style="list-style-type: none"> • 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. •
052	System Adequacy and Security Reliability Assessment	<ul style="list-style-type: none"> • 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.
053	Facility Connection Requirements	<ul style="list-style-type: none"> • Change “Regions” to “Compliance Monitor” in all Compliance Monitoring Process sections • “Transmission Owner” should be capitalized at the end of R1-1 (top of page 3) • Omit “they” at end of M1-2 (top of page 5)
054	Documentation and Review of Available Transfer Capability/Total Transfer Capability Methodologies and Calculations	<ul style="list-style-type: none"> • Sections 2 & 3 - Add a row “Section 2 Applicability – appropriate Functional Model entity” and “Section 3 Applicability - appropriate Functional Model entity.” • In R1-1b, “transmission provider’s system” should be changed to Functional Model entity Transmission Service Provider’s system
055	Documentation and Reviews of Capacity Benefit Margin Methodologies and Calculations	<ul style="list-style-type: none"> • “Applicability” for Sections 1 and 2 should be changed to “appropriate Functional Model Entity” • R1-1 has several references to “transmission provider” that should be changed to Functional Model entity “Transmission Service Provider”. • R2-1c has ATC abbreviation that should be written fully • R2-1d, M3-2, R4-2, and M4-1 have “Regions” that should be changed to appropriate Functional Model entity. • R4-1 does not say to whom Transmission Service Providers should report CBM as was does in original policy (M5).

No.	Title	Comments
056	Documentation and Reviews of Transmission Reliability Margin Methodologies and Calculations	<ul style="list-style-type: none"> • 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. • Section 1 Levels of Non-Compliance has wording for ATC and TTC that should say “Transmission Reliability Margin” (Level 1 and Level 4) • R2-1 and R2-1c have references to “transmission provider”; should be as defined in the NERC Functional Model “Transmission Service Provider” • Section 2 Levels of Non-Compliance references “transmission provider” should be as defined in the NERC Functional Model “Transmission Service Provider”.
057	Requirements for the Installation and Reporting of Disturbance Monitoring Equipment	<ul style="list-style-type: none"> • 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 • R2-1 and Section 5 Applicability say “Generation Owner” instead of “Generator Owner”, which is a Functional Model entity • Section 2 Measures should be M2-1 and M2-2, not M1 and M2 • Section 2 Levels of Non-Compliance Level 3 should say “three, four, or five” NOT “three, for, or five” • R3-2 references 5 business day requirement while Section 3 Compliance says 30 business days • Possessive form of “Transmission Owner” should be used in M4-1 • Semicolon needed in Section 4 Levels of Non-Compliance Level 1 before “however” • Comma needed after “Transmission Planner” in Section 5 Requirements • Possessive forms of “Planning Authority ” and “Transmission Planner” should be used in M5-1 • No Section 5 Levels of Non-Compliance shown • Please add “c. generators” to Item 6 to make it compatible with Planning Standard I.F.M1 – verify with the standard R1-1 6
058	Requirements for the Submittal of Steady-state and Dynamic Data and Development of System Models	<ul style="list-style-type: none"> •

No.	Title	Comments
059	System Modeling Data Requirements – Generation Equipment	<ul style="list-style-type: none"> • Need another space after II.B. on page 1 under Existing Document Language • Missing “Applicable to” information throughout • 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 • R3-1 – should they be required to submit reactive capability curves? • R3-1.a – Should hydrogen pressure be included in the list of functional variables along with real power output, and generator voltage? • R5-1 – should they be required to submit graphs of the governor droop characteristics?
060	Facility Ratings	<ul style="list-style-type: none"> • R1-1.1 – should relays be listed along with the other equipment in a-g?
061	Actual and Forecasted Demands	<ul style="list-style-type: none"> • Overall Standard Applicability should be changed to reflect Section numbers rather than Planning Standard numbers. • Section 1: Delete the Regional Reliability Council from the “Section 1 Compliance Monitoring Process”. The RRC should not be monitoring itself for Compliance. • R3-1 – no translation was attempted • Section 3 Levels of Non-compliance – no translation was attempted
062	Load Models for System Dynamic Studies	<ul style="list-style-type: none"> •
063	Transmission Protection System	<ul style="list-style-type: none"> • M2-1 – what kind of evidence? • R3-1.a – should breakers and switches be included in the list? • M3-2 – what kind of evidence?
064	Voltage Support and Reactive Power	<ul style="list-style-type: none"> • Reactive Capability curves? (See Std 59 R3-1)

No.	Title	Comments
065	Generation Control and Protection	<ul style="list-style-type: none"> • Section 7 – how “Temporary”? • Section 7 Levels of Non Compliance – Change “or” to “and” in the last line of Level 1 • Section 9 Requirements – should they be required to include graphs • Section 11: Please make Applicability and Requirement R11-1 apply to the same entity, either the Generation Owner or the Generation Operator. • R11-1 (a) Change reference to some part of these Standards.
066	Transmission System Control Devices	<ul style="list-style-type: none"> • Section 1 - Applicability should include Transmission Owners • Reference to Regions in R1-2, and for Compliance Monitoring • 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. • Section 3 - Applicability should include Transmission Operator
067	Under Frequency Load Shedding (under frequency load shedding)	<ul style="list-style-type: none"> • 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. • Applicability section refers to Regional Reliability Councils which are not in the Functional Model. In stead it should refer to Reliability Authority. • 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. • Section 2 should refer to coordination of under frequency load shedding programs with those of Reliability Authority. • 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.

No.	Title	Comments
068	Under Voltage Load Shedding	<ul style="list-style-type: none"> • Purpose should refer to system reliability rather than preservation, or preservation of system reliability. • Applicability should refer to Reliability Authority rather than Regional Reliability Council in all sections of this standard. • Compliance Monitoring Process should refer to Compliance Monitor rather than Regional Reliability Council.
069	Special Protection Systems	<ul style="list-style-type: none"> • Standard Applicability should refer to Reliability Authority rather than Regional Reliability Councils. • Requirements of Section 1 should refer to Reliability Authority rather than Regional Reliability Councils. • Section 1 measures should refer to Transmission Owners, Transmission Operators, Generator Owners, and Distribution Operators rather than members of Regional Reliability Councils. • 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. • Section 6 Compliance Monitoring Process refers to Regional Reliability Council, in stead it should refer to Compliance Monitor or Reliability Authority whichever is applicable.
070	System Black Start Capability	<ul style="list-style-type: none"> • Regional Reliability Council should be replaced with Reliability Authority throughout this standard. • 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 used in the original standard with no logical reasons. • Section 3 Applicability should include Reliability Authority along with Transmission Operator. • R4-2 should include that the test results will be provided to Reliability Authority and Transmission Operators in place or Regional Reliability Council.

No.	Title	Comments
071	Automatic Restoration of :Load	<ul style="list-style-type: none"> • Regional Reliability Councils referred throughout this standard should be replaced with Reliability Authority. • Section 1 should be applicable to Reliability Authorities rather than Regional Reliability Councils. • Section 3 Applicability should also include Reliability Authority under the definition of Responsible Entity.. • R3-2 should refer to affected Regions rather than Regional Reliability Councils. • Section 3 Compliance Monitoring Process does not appear to be complete as it does not provide sufficient details. • R4-2 refers to providing the documentation to affected Regional Reliability Councils, it should be referring to Regions, or Reliability Authorities.
072	Vegetation Management Program	<ul style="list-style-type: none"> • Purpose statement is incomplete. Whom the vegetation related outages should be reported to? • Requirements should refer to Reliability Authority rather than Regional Reliability Council. • It is not included if the Self Certification needs to be sent to the Compliance Monitor or some other entities. • Section 1 Compliance Monitoring Process should also refer to Transmission Operator in addition to Transmission Owner. • Section 1 Levels of Non Compliance are in correct format. This does not show levels.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The Interchange Subcommittee is submitting comments to Standards 010 through 013 but will not vote on the Standards.

Individual subcommittee members and their companies plan to submit additional comments.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The NERC Interchange Subcommittee recognizes and understands the mandate of the Version 0 Standard Drafting Team to minimize policy changes in the conversion to the new Version 0 Standards. The subcommittee's comments does not change the intent of policy but does clarify certain reliability problems found in policy.

The subcommittee is concerned that there are no Measurements in the Standards as the Measurements are as important as the Standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The Interchange Subcommittee believes that there are certain situations in which clarifications to existing policy is needed and appropriate to create meaningful standards. The subcommittee supports making changes or clarification to Policy 3, such as the graduated bandwidth for Re-Tagging of dynamic schedules and a requirement for adjacent Balancing Authorities to have a documented process for confirming interchange schedules.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

The Interchange Subcommittee believes that existing redundancies need to be eliminated from the standards and the standards would be improved with a more logical grouping of the requirements. Both goals could be accomplished without changing the intent of policy.

In translating the current policies to the Functional Model and after removing business practices from policy, there will be some remaining requirements that must be clarified. The goal should be to reduce those areas of confusion in current policy without changing the intent of policy.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The translation Policy 3 entities of FM functions is correct.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

This question is not applicable to templates 010 - 013.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The NERC and NAESB interchange groups continue working on the Appendices for Policy 3.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No comment.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The RA/RC issue must be resolved because the Functional Model states that the IA submits the E-Tag to a Reliability Authority for approval. This does not happen today. The Reliability Coordinator does not receive the E-Tag until the E-Tag is approved. Reliability review of the E-Tag is currently done by the Control Area.

This functionality will require a change to the E-Tag specification.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The subcommittee agrees with this recommendation

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

No comment.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

No comment.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Proposed Draft Version 0 Standard Language		Interchange Subcommittee Response
Standard	010	<u>Response:</u> All words in SMALL CAPS were revised the templates and E-Tag submitted for Tag throughout the templates.
Title	Interchange Transaction Tagging	
Purpose	To ensure that Interchange Transactions, certain Interchange Schedules, and certain intra-Balancing Area transfers using point-to-point transmission service are E-Tagged. in adequate time to allow them to be assessed for reliability impacts before being approved by the affected RELIABILITY AUTHORITIES, TRANSMISSION SERVICE PROVIDERS and BALANCING AUTHORITIES, and to allow adequate time for implementation.	<u>Response:</u> Assessment in the Purpose for 010 is redundant with the Purpose for 011.
Effective Date	February 8, 2005	
Applicability	1. Purchase-Selling Entities 2. Balancing Authorities	
Requirements	<p>R1 The load-serving PURCHASING-SELLING ENTITY shall be responsible for tagging all INTERCHANGE TRANSACTIONS (those that are between BALANCING AUTHORITY AREAS) and all transfers that are entirely within a BALANCING AREA using point to point transmission service (including all grandfathered and “non-Order 888” point to point transmission service). The load-serving PURCHASING-SELLING ENTITY shall be responsible for tagging all DYNAMIC SCHEDULES at the expected average MW profile for each hour.</p> <p>R2 The sink BALANCING AUTHORITY shall be responsible for tagging all INTERCHANGE TRANSACTIONS established to replace unexpected generation loss, such as through prearranged reserve sharing agreements or other arrangements, and all emergency transactions to mitigate SOL or IROL violations. Such interchange shall be exempt from tagging for 60 minutes from the time at which the INTERCHANGE TRANSACTION begins, regardless of magnitude or duration.</p> <p><u>Response:</u></p>	<u>Response:</u> To ensure that each functional entity is clear on the requirements for E-Tagging Interchange and which E-Tags each entity is responsible for submitting, the Interchange Subcommittee believes that the requirements should be listed as in the revised R1

	<p><u>R1 – All Interchange Transactions, Bilateral Interchange Schedules and intra-Balancing Authority transfers using Point-to-Point Transmission Service, shall be E-Tagged. The transactions that shall be E-Tagged include:</u></p> <ul style="list-style-type: none"> • <u>Dynamic Schedules at the expected average MW profile for each hour.</u> <p><u>Note: E-Tags may be submitted by entities other than the Load Serving Purchasing-Selling Entity for the following:</u></p> <ul style="list-style-type: none"> • <u>Interchange Transactions established to replace unexpected generation loss, such as through prearranged reserve sharing agreements or other arrangements.</u> <ul style="list-style-type: none"> ○ <u>Exempt from E-Tagging for 60 minutes from the time at which the Interchange Transaction begins, regardless of magnitude or duration.</u> • <u>Emergency Transactions to mitigate OSL violations.</u> <ul style="list-style-type: none"> ○ <u>Exempt from E-Tagging for 60 minutes from the time at which the Interchange Transaction begins, regardless of magnitude or duration.</u> • <u>Bilateral Inadvertent Interchange Payback.</u> • <u>Jointly Owned Units</u> <p>R3 The sink BALANCING AUTHORITY shall be responsible for tagging all Bilateral Inadvertent Interchange Payback.</p> <p>R4 <u>R2</u> The The Balancing Authority or Purchasing-Selling Entity responsible for submitting the E-Tag shall submit all E-Tags to the Sink Balancing Authority according to timing tables in Attachment 1.</p>	<p>Response: <u>The IS deleted the Load Serving PSE as the responsible entity from this requirement because the requirement is covered in NAESB's VO.</u></p>
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Measures	A Balancing Authority shall meet 100% of the tagging requirements for all scheduled Interchange between Balancing Authority areas and within the Balancing Authority's area.	<u>Response: The measure should ensure that all Interchange is E-Tagged and that the BA only enters into its ACE equation "composite approved" Tagged Interchange.</u>
Regional Differences	WECC Waiver: <ul style="list-style-type: none"> o Inadvertent Payback o Dynamic Schedules 	
Compliance Monitoring Process	Not Specified.	
Levels of Non Compliance	Not Specified.	

Attachment 1 – Tag Submission and Response Timetables for New Transactions

Proposed Draft Version 0 Standard Language		Interchange Subcommittee Response	
Standard	011		
Title	Interchange Transaction E-Tag Communication and Reliability Assessment		
Purpose	To ensure that the E-Tag is provided to all entities needing the E-Tags to make reliability assessments and to ensure all affected reliability entities assess the reliability impacts of Interchange Transactions before approving or denying an E-Tag. To communicate the approvals and denials of the E-Tag and the final composite status of the E-Tag.		
Effective Date	February 8, 2005		
Applicability	1. Balancing Authorities 2. Transmission Service Providers		
Requirements	<p>R1 The Sink Balancing Authority shall ensure that all E-Tags and any modifications to E-Tags are provided to the following entities for reliability assessment:</p> <ul style="list-style-type: none"> ○ Sink and Source Balancing Authority or their designated Scheduling Agent. ○ Intermediary Balancing Authorities. ○ Transmission Service Provider(s). ○ Reliability Authority(s) (receives through IDC). ○ Security Analysis Services (IDC or other regional reliability tools). <p>R2 Transmission Service Providers on the Scheduling Path shall be responsible for assessing and approving or denying the Interchange Transaction. The Transmission Service Provider shall verify and assess:</p> <ul style="list-style-type: none"> ○ Valid OASIS reservation number or transmission contract identifier. ○ Transmission priority matches reservation. ○ Energy profile fits within OASIS reservation. ○ OASIS reservation accommodates multiple-all Interchange Transactions. 	<p>Response: The “Connectivity” requirement is not in Policy</p>	

	<ul style="list-style-type: none"> ○ Connectivity of adjacent Transmission Service Providers. ○ Loss scheduling accounting <p>R3 Balancing Authorities on the Scheduling Path shall be responsible for assessing and approving or denying the Interchange Transaction. The Balancing Authority shall verify and assess:</p> <ul style="list-style-type: none"> ○ Transaction start and end time. ○ <u>Energy profile (ability to support the magnitude of the transaction).</u> ○ <u>The ramp (ability of generation maneuverability to accommodate).</u>Energy profile, including the ramp (ability of the generation to support the magnitude and maneuverability of the transaction) ○ Scheduling path (proper connectivity of adjacent Balancing Authorities). <p>R5 <u>R4</u> Each Balancing Authority and Transmission Service Provider on the scheduling path shall communicate their approval or denial of the Interchange Transaction to the Sink Balancing Authority.</p> <p>R6 <u>R5</u> Upon receipt of approvals or denials from all of the individual Balancing Authorities and Transmission Service Providers, the Sink Balancing Authority shall communicate the composite approval status of the Interchange Transaction to the Purchasing-Selling Entity and all other Balancing Authorities, Transmission Service Providers and Reliability Authorities on the scheduling path.</p>	<p><u>but it makes sense to include it.</u></p> <p><u>Response: Loss accounting is not material to the reliability of the bulk electric system and should be removed from this standard. Scheduling of losses is a reliability concern.</u></p> <p><u>Response: The subcommittee believes that maneuverability is related to generation not transactions. Bullet 2 under R3 should be restated as:</u></p> <ul style="list-style-type: none"> ○ <u>Energy profile (ability to support the magnitude of the transaction)</u> ○ <u>The ramp (ability of generation maneuverability to accommodate)</u> 	
Measures	Not Specified.		
Regional Differences	MISO Waiver: <ul style="list-style-type: none"> ○ Scheduling Agent Waiver ○ Enhanced Scheduling Waiver 		
Compliance Monitoring	Not Specified.		

Process		
Levels of Non Compliance	Not Specified.	

Proposed Draft Version 0 Standard Language		<u>Interchange Subcommittee Response</u>
Standard	012	
Title	Interchange Transaction Implementation	
Purpose	To ensure Balancing Authorities confirm Interchange Schedules with adjacent Balancing Authorities prior to implementing the schedules in their Area Control Area (ACE) equations. To ensure Balancing Authorities incorporate all confirmed schedules into their Automatic Generation Control (AGC) ACE equations.	
Effective Date	February 8, 2005	
Applicability	1. Balancing Authorities	
Requirements	<p>R1 Each Receiving Balancing Authority shall confirm Interchange Schedules with the Sending Balancing Authority prior to implementation in the Balancing Authority's AGC's AEC equation or in the system that calculates the Balancing Authority's ACE equation. The Sending Balancing Authority and Receiving Balancing Authority shall agree on:</p> <ul style="list-style-type: none"> o <u>Interchange Schedule start and end time.</u> o <u>Energy profile.</u> o Energy profile, including rRamp start time and rate. <p>Note: Ramp start time and rate may be different than the default if all parties involved in the transaction agree.</p> <ul style="list-style-type: none"> (a) Default ramp rate for the Eastern Interconnection shall be 10 minutes equally across the Interchange Schedule start and end times. . (b) Default ramp rate for the Western Interconnection shall be 20 minutes equally across the Interchange Schedule start and end times. (c) Ramp durations for Interchange Schedules implemented for compliance with NERC's Disturbance Control Standard (recovery from a disturbance condition) and Interchange Transaction curtailment in response to line loading relief procedures may be shorter than the above defaults, but must be identical for the Sending Balancing Authority and Receiving Balancing Authority. o If a DC tie is on the contract path, then the Sending Balancing Authorities and Receiving Balancing Authorities shall coordinate the Interchange Schedule with the Transmission Operator of the DC tie. 	

	<p>R2 Balancing Authorities shall implement Interchange Schedules only with Adjacent Balancing Authorities.</p> <p>R3 <u>Upon receiving composite approval from the Sink Balancing Authority</u>, each Balancing Authority on the scheduling path shall implement approved Interchange Transactions. Implementation is accomplished by entering confirmed schedules into the AGC's ACE equation. The SINK BALANCING AUTHORITY shall be responsible for initiating implementation of each INTERCHANGE TRANSACTION as tagged. Each BALANCING AUTHORITY on the scheduling path shall incorporate each INTERCHANGE TRANSACTION into its INTERCHANGE SCHEDULES.</p>		<p><u>Response:</u> The requirement in R3 is redundant to 011, R6 (R5). The IS has submitted wording to replace R3.</p>
Measures	Not Specified.		
Regional Differences	MISO Waivers: <ul style="list-style-type: none"> ○ Scheduling Agent Waiver ○ Enhanced Scheduling Waiver 		

	o Energy Flow Information Waiver	
Compliance Monitoring Process	Not Specified.	
Levels of Non Compliance	Not Specified.	

Proposed Draft Version 0 Standard Language		<u>Interchange Subcommittee Response</u>	
Standard	013		
Title	Interchange Transaction Modifications		
Purpose	To allow modifications to an Interchange Transaction.		
Effective Date	February 8, 2005		
Applicability	<ol style="list-style-type: none"> 1. Balancing Authorities 2. Transmission Service Providers 3. Reliability Authorities 4. Purchasing-Selling Entities 		
Requirements	<p>R1 If a Reliability Authority, Transmission Operator, Intermediary Balancing Authority, Source Balancing Authority or Sink Balancing Authority requires modification to an Interchange Transaction due to a reliability event, the entity shall modify the Interchange Transaction E-Tag that is in progress or scheduled to be started, and communicate the modification to the Sink Balancing Authority. Any RELIABILITY AUTHORITY, TRANSMISSION SERVICE PROVIDER, SOURCE BALANCING AUTHORITY, or SINK BALANCING AUTHORITY that requires modification to an INTERCHANGE TRANSACTION due to loss of generation, loss of load, or a TLR event (or other regional congestion management practices) shall set a new limit on the INTERCHANGE TRANSACTION tag that is in progress or scheduled to be started, and shall communicate this new limit to the SINK BALANCING AUTHORITY. A GENERATOR OPERATOR or LOAD SERVING ENTITY may request the HOST BALANCING AUTHORITY to modify an interchange transaction due to loss of generation or load.</p> <p>R2 Upon receipt of modification to a E-Tag, the Sink Balancing Authority shall communicate the modified information about the Interchange Transaction including its composite approval status to the Purchasing-Selling Entity and all Balancing Authorities, Transmission Service Providers and Reliability Authorities on the scheduling path. The SINK BALANCING AUTHORITY shall be responsible for implementing the required modifications to the INTERCHANGE TRANSACTIONS tag to comply with the specified</p>	<p>Response: R1 and R2 should be deleted, as they are redundant and not worded as requirements. The IS has submitted alternate wording.</p>	

	<p>new limit set in Requirement 1.</p> <p>R3 At such time as the reliability event allows for the reloading of the transaction, the entity that initiated the curtailment shall release the limit on the Interchange Transaction E-Tag to allow reloading the transaction and shall communicate the release of the limit to the Sink Balancing Authority.</p> <p>R4 A Purchasing-Selling Entity responsible for E-Tagging a Dynamic Interchange Schedule shall modify the E-Tag when the energy profile deviates by more than 25% from the previously E-Tagged energy profile.</p> <p>R5 <u>A Reliability Authority, Transmission Operator, Intermediary Balancing Authority, Source Balancing Authority, or Sink Balancing Authority</u>A BALANCING AUTHORITY or PURCHASING wishing to modify an Interchange Transaction <u>for reliability reasons</u> shall submit a request to modify the E-Tag to the Sink Balancing Authority according to the timing tables in Attachment 1.</p>		
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Response: The IS believes that their original submittal should be used as for Re-Tagging Dynamic Schedules:

R4 Where a dynamic schedule is in place between Balancing Authorities, a modification is required when:

- o If the transaction is 100 MW or less and the deviation is more than 10 MW.
- o If the transaction is greater than 100 MW and the deviation is greater than 10%.

Measures	Not Specified.	
Regional Differences	Tagging Dynamic Schedules and Inadvertent Payback	
Compliance Monitoring Process	Not Specified.	
Levels of Non Compliance	Not Specified.	

Proposed Draft Version 0 Standard Language

Standard	010
Title	Interchange Transaction Tagging
Purpose	To ensure that Interchange Transactions, intra-Balancing Area transfers using point-to-point transmission service, and certain Interchange Schedules are E-Tagged.
Effective Date	February 8, 2005
Applicability	1. Purchase-Selling Entities 2. Balancing Authorities
Requirements	<p>Response: R1 – All Interchange Transactions, intra-Balancing Authority transfers using point-to-point Transmission Service, and Bilateral Interchange Schedules, shall be E-Tagged. The transactions that shall be E-Tagged include:</p> <ul style="list-style-type: none"> • Dynamic Schedules at the expected average MW profile for each hour. • Interchange Transactions established to replace unexpected generation loss, such as through prearranged reserve sharing agreements or other arrangements. <ul style="list-style-type: none"> ○ Exempt from E-Tagging for 60 minutes from the time at which the Interchange Transaction begins, regardless of magnitude or duration. • Emergency Transactions to mitigate Operating Security Limit (OSL) violations. <ul style="list-style-type: none"> ○ Exempt from E-Tagging for 60 minutes from the time at which the Interchange Transaction begins, regardless of magnitude or duration. • Bilateral Inadvertent Interchange Payback. • Jointly Owned Units <p>R2 To permit adequate time for Interchange Schedule implementation Interchange Transactions shall be submitted according to the Tag Submission and Response Timetables in Attachment 1.</p>
Measures	A Balancing Authority shall meet 100% of the E-Tagging requirements for all scheduled Interchange between Balancing Authority Areas and within the Balancing Authority's area.

Regional Differences	WECC Waiver: <ul style="list-style-type: none"> • Tagging Dynamic Schedules and Inadvertent Payback MISO Waiver: <ul style="list-style-type: none"> • Scheduling Agent • Enhanced Scheduling Agent • Energy Flow 	
Compliance Monitoring Process	Not Specified.	
Levels of Non Compliance	Not Specified.	

Attachment 1 – Tag Submission and Response Timetables for New Transactions

Proposed Draft Version 0 Standard Language

Standard	011
Title	Interchange Transaction E-Tag Communication and Reliability Assessment
Purpose	To ensure that the E-Tag is provided to affected reliability entities to assess the reliability impacts of Interchange Transactions before approving or denying an E-Tag. To communicate the approvals and denials of the E-Tag and the final composite status of the E-Tag.
Effective Date	February 8, 2005
Applicability	1. Balancing Authorities 2. Transmission Service Providers
Requirements	<p>R1 The Sink Balancing Authority shall ensure that all E-Tags and any modifications to E-Tags are provided to the following:</p> <ul style="list-style-type: none"> ○ Sink and Source Balancing Authority or their designated Scheduling Agent. ○ Intermediary Balancing Authorities. ○ Transmission Service Provider(s). ○ Reliability Authority(s) (Receives after approval through the IDC). ○ Security Analysis Services (IDC or other regional reliability tools). <p>R2 Transmission Service Providers on the Scheduling Path shall be responsible for assessing and approving or denying the Interchange Transaction. The Transmission Service Provider shall verify and assess:</p> <ul style="list-style-type: none"> ○ Valid OASIS reservation number or transmission contract identifier. ○ Transmission priority matches reservation. ○ Energy profile fits within OASIS reservation. ○ OASIS reservation accommodates all Interchange Transactions. ○ Connectivity of adjacent Transmission Service Providers. ○ Loss scheduling. <p>R3 Balancing Authorities on the Scheduling Path shall be responsible for assessing and approving or denying the Interchange Transaction. The Balancing Authority shall verify and assess:</p> <ul style="list-style-type: none"> ○ Transaction start and end time. ○ Energy profile (Ability to support the magnitude of the transaction). ○ The ramp (Ability of generation maneuverability to accommodate).

	<ul style="list-style-type: none"> o Scheduling Path (Proper connectivity of adjacent Balancing Authorities). <p>R4 Each Balancing Authority and Transmission Service Provider on the Scheduling Path shall communicate their approval or denial of the Interchange Transaction to the Sink Balancing Authority.</p> <p>R5 Upon receipt of approvals or denials from all Balancing Authorities and Transmission Service Providers, the Sink Balancing Authority shall communicate the composite approval status of the Interchange Transaction to the Purchasing-Selling Entity and all other Balancing Authorities, Transmission Service Providers and Reliability Authorities on the Scheduling Path.</p>
Measures	Not Specified.
Regional Differences	MISO Waiver: <ul style="list-style-type: none"> o Scheduling Agent o Enhanced Scheduling
Compliance Monitoring Process	Not Specified.
Levels of Non Compliance	Not Specified.

Proposed Draft Version 0 Standard Language

Standard	012
Title	Interchange Transaction Implementation
Purpose	To ensure Balancing Authorities confirm Interchange Schedules with adjacent Balancing Authorities prior to implementing the schedules in their Area Control Error (ACE) equations. To ensure Balancing Authorities incorporate all confirmed schedules into their ACE equations.
Effective Date	February 8, 2005
Applicability	1. Balancing Authorities
Requirements	<p>R1 Each Receiving Balancing Authority shall confirm Interchange Schedules with the Sending Balancing Authority prior to implementation in the Balancing Authority's ACE equation or in the system that calculates the Balancing Authority's ACE equation. The Sending Balancing Authority and Receiving Balancing Authority shall agree on:</p> <ul style="list-style-type: none"> o Interchange Schedule start and end time. o Energy profile. o Ramp start time and rate. <p>Note: Ramp start time and rate may be different than the default if all parties involved in the Transaction agree.</p> <ul style="list-style-type: none"> (a) Default ramp rate for the Eastern Interconnection shall be 10 minutes equally across the Interchange Schedule start and end times. . (b) Default ramp rate for the Western Interconnection shall be 20 minutes equally across the Interchange Schedule start and end times. (c) Ramp durations for Interchange Schedules implemented for compliance with NERC's Disturbance Control Standard (recovery from a disturbance condition) and Interchange Transaction curtailment in response to line loading relief procedures may be shorter than the above defaults, but must be identical for the Sending Balancing Authority and Receiving Balancing Authority. o If a DC tie is on the contract path, then the Sending Balancing Authorities and Receiving Balancing Authorities shall coordinate the Interchange Schedule with the Transmission Operator of the DC tie. <p>R2 Balancing Authorities shall implement Interchange Schedules only with Adjacent Balancing Authorities.</p> <p>R3 Upon receiving composite approval from the Sink Balancing Authority, each Balancing Authority on the Scheduling Path shall</p>

	implement approved Interchange Transactions. Implementation is accomplished by entering confirmed schedules into the ACE equation.
Measures	Not Specified.
Regional Differences	MISO Waivers: <ul style="list-style-type: none">○ Scheduling Agent○ Enhanced Scheduling○ Energy Flow Information
Compliance Monitoring Process	Not Specified.
Levels of Non Compliance	Not Specified.

Proposed Draft Version 0 Standard Language

Standard	013
Title	Interchange Transaction Modifications
Purpose	To allow modifications to an Interchange Transaction.
Effective Date	February 8, 2005
Applicability	<ol style="list-style-type: none"> 1. Balancing Authorities 2. Transmission Service Providers 3. Reliability Authorities 4. Purchasing-Selling Entities
Requirements	<p>R1 If a Reliability Authority, Transmission Operator, Scheduling Entity, Source Balancing Authority or Sink Balancing Authority requires modification to an Interchange Transaction due to a reliability event, the entity shall modify the Interchange Transaction E-Tag that is in progress or scheduled to be started, and communicate the modification to the Sink Balancing Authority.</p> <p>R2 Upon receipt of modification to an E-Tag, the Sink Balancing Authority shall communicate the modified information about the Interchange Transaction including its composite approval status to the Purchasing-Selling Entity and all Balancing Authorities, Transmission Service Providers and Reliability Authorities on the Scheduling Path.</p> <p>R3 At such time as the reliability event allows for the reloading of the transaction, the entity that initiated the curtailment shall release the limit on the Interchange Transaction E-Tag to allow reloading the transaction and shall communicate the release of the limit to the Sink Balancing Authority.</p> <p>R4 Where a dynamic schedule is in place between Balancing Authorities, a modification is required when:</p> <ul style="list-style-type: none"> ○ The transaction is 100 MW or less and the deviation is more than 10 MW. ○ The transaction is greater than 100 MW and the deviation is greater than 10%. <p>R5 A Reliability Authority, Transmission Operator, Scheduling Entity, Source Balancing Authority, or Sink Balancing Authority wishing to modify an Interchange Transaction for reliability reasons shall submit a request to modify the E-Tag to the Sink Balancing Authority according to the timing tables in Attachment 1.</p>
Measures	Not Specified.
Regional	WECC Waiver

Differences	Tagging Dynamic Schedules and Inadvertent Payback
Compliance Monitoring Process	Not Specified.
Levels of Non Compliance	Not Specified.

Attachment 1 – Tag Submission and Response Timetables for New Transactions

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments:

Standards should be clear, well defined, measurable and crisp. Significant comments would need to be incorporated to meet these criteria.

A realistic implementation plan needs to be developed prior to compliance monitoring and assessment.

General comments on Planning Standards Translation:

We believe the Requirements should refer to the "S" 's and not the writing of the measurements of the existing Planning Standards. For example, in Standard 051, the focus is shifted from (as labelled in S1) "The interconnected transmission systems shall..." to (as label in R1-1) "Assessments Requirements". So the Standard is on "assessing that the system meet Table 1 contingencies" and not the "System shall be planned to meet Table 1 contingencies". In the existing standard, assessment is a measure of compliance and that should be the same in the translation. Therefore, the R's in Version-0 should refer to the S's and the Measures should refer to the M's from the existing Planning Standards. So there should be as many R in Version-0 as there were S in the existing Planning Standards and as many measures in the new Version as there were in existing Planning Standards. So a new translation table should be provided in the 2nd draft of Version-0.

In the Background information from the Working Group, it is indicated that the Standard Applicability is referring to the NERC Functional Model functions. The Translation table refers to the Entity performing the function but we agree that Applicability should refer to the Entity. NPCC's participating members agrees with the WG that the numbering of the Standard should be improved to make a better translation to the present Planning Standards sequence: IA, IB...IIA, IIB... This will help to navigate more easily through the different issues that are covered by the Standards.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments:

Inclusion of the Phase III and IV Planning Templates/Measures (that did not go through the complete NERC process of field testing-evaluation and revision and could therefore result in a broad rejection of the entire set of Version 0 Standards.)

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree. Disagree.

Comments:

Some guidelines from the current Operating Policies become "requirements" in the new standards. This may cause some non-compliance issues at the implementation as certain entities may have other practices that meet "good utility practices" but not necessarily the proposed "requirements." We believe there are some outstanding issues with respect to the Version 0 Planning Translation that may lead to misinterpretation (see Question 1 comments)

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
 Minimize the changes to simplify the transition from existing rules to Version 0.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree. Disagree.

Comments:

TransÉnergie has endorsed Version 2 of the Functional Model as acceptable, but before its implementation in Version 0 Standards improvements are required to better describe certain functions and to eliminate confusion in responsibilities.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
 Do not include these functions in the requirements.

Comments:

Version 0 is supposed to translate the requirements from the present Operating Policies without introducing new issues, other than reflecting the NERC Functional Model. For example, new standard 032 is addressed to "RA, BA and Transmission Operators," while System Operators performing RA, BA and IA responsibilities are those really targeted, and not the Transmission Operators.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of "no changes to the reliability rules in Version 0." The

Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree. Disagree

Comments: Only one set of business practices should exist (NAESB.)

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments:

We suggest that ATC, TRM and CBM related standards be turned over to NAESB as business practices. 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. Since TRM and CBM are margin related to ATC, these also should be of commercial concern.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks "upward" to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree. Disagree.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree. (comments below) Disagree.

Comments:

With the exception of new standard 032 which should be addressed to RA, BA and IA. (see our Comments at Questions 5 and 6).

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: These standards need to be field tested and revisited before implementation.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>

57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: See comments above (Question 11)

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
004		First Drafting Team comment	We agree with the Drafting Team that the ability to halt a Time Error Correction is a Reliability Consideration and must remain a NERC Standard.
026		Purpose	We believe that the load shedding implementation requirement should be moved to another standard in order to differentiate planning requirements (load shedding capacity, technical considerations,...) and implementation procedure. (separate the "what" from the "when").
032		Applicability; Requirements; Measures	TRANSMISSION OPERATORS should be replaced by SYSTEM OPERATORS as in the present Policy 8. Failing this, the TOs should be changed to INTERCHANGE AUTHORITY, because these requirements are applicable to all three Authorities.
032		R1.2	"Positions that are directly responsible for complying with NERC" should be changed to: "Operating Personnel in positions that are directly responsible for complying with NERC." To be consistent with the existing template P8T2. The Operating Position certification is not a measurement in the new Operating Policy translation, but P8T2 requires such reporting.
032		M1.2	A very good measure which should be kept in the new standard.
051	all sections	Regional Differences	See NPCC BPS Definition in Question 1
054			The ATC is a business issue that should not be part of the Version 0 standard. In addition there are parts of

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			the Northeast that have FERC approved Market Designs that don't use ATC, CBM or TRM. 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
055 & 056			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. Since TRM and CBM are margin related to ATC, these also should be of commercial concern.
54, 55, 56 54	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?

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

- The document "Terms used in Policies" should be updated to include new terms and be available before the implementation of Version 0 Standards.
- A realistic interim period should be considered when both systems could be in effect to give time to the industry to fully move to the Version 0 Standards (see Comments at Question 3) and to implement new requirements that were guidelines in NERC Policies.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
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NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: PSTF for NERC PC					
Lead Contact		Armando J. Perez, Chair, PSTF		Organization: CAISO	
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Member Names	Organization	Segment	Member Names	Organization	Segment
Manjula Datta-Barua	CenterPoint Energy	ERCOT	John W. Shaffer	Florida Power & Light Company	FRCC
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Gregory L. Pieper	Xcel Energy, Inc.	MAPP	Jeffrey R. Webb	Midwest ISO	Midwest ISO
Virginia C. Sulzberger	NERC	staff			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The format of the Version 0 standards needs to appropriately reflect the existing Planning Standard categories. The suggested parallelism is as follows:

Version 0		Planning Standards
Purpose	--	Introduction
Section	--	Statement of Standards
Requirements	--	Measurements
Measures	--	Compliance Issues

Confusion exists among the requirements and the measures. There is also no clear differentiation where the standards end and the compliance issues begin.

The Planning Committee's Planning Standards Task Force is reviewing each of the Version 0 (planning) standards and will provide detailed comments on each by August 18, 2004 or earlier. A sample of the PSTF's review, using Version 0 standard 051, is shown on Attachment A that will be provided to Gerry Cauley under separate cover for posting along with the PSTF's comments. Specific comments on that standard (which may be applicable to the other standards) include:

- 1) The full Introduction of the original standard should be included in the Purpose.**
- 2) A clear statement of the standard in each of the four sections of standard 051 is needed.**
- 3) A clear statement of the original measurements and what they mean in terms of the table needs to be reinstated.**
- 4) Functional model entity terminology needs to be used throughout. The references to the Regions should be removed.**
- 5) The Guidelines specifically developed for the application of this standard 051 needs to be retained.**

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Need a clear conversion of the standards without deletions or additions. Appears that some modifications back to the original planning standards need to be added.

The Version 0 (planning) standards need to be compared with both the existing Planning Standards previously approved by the NERC Board of Trustees and the Planning Standard Compliance Templates as approved by the NERC board in April 2004.

Need a consistent set of criteria to be used to eliminate certain standards and retain others. (See responses to Questions 11 and 12.)

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The Version 0 standards need additional work. The conversion of the standards should not be a reasonable translation but an exact translation to the extent possible from the original planning standards perspective. Changes to the planning standards should be through the NERC ANSI-approved standards process.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

The planning standards only have standards and measurements. The use of the terms requirements and measures is a cause of much confusion. Perhaps the planning standards should only have requirements or measures, but not both.

Further explanation, with examples, of the Version 0 format is necessary, particularly as it pertains to requirements and measures.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Entities such as Regions in the Version 0 standards should be unacceptable. Only functional entities as appear in the Functional Model should be used. A Region may wish to be a planning authority and/or a compliance monitor but must be registered as such.

A full or complete conversion of the planning and operating standards to Functional Model terminology must occur at the same time and be consistent in its applicable or again the Version 0 standards will remain a work in progress rather than a complete codification of the NERC reliability standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

All appropriate functional entities should be used. An organization may serve in the capacity of one or more functional entities.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

No comment.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No suggestions at this time.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment. However, the areas where the Version 0 standards deviate from the Functional Model need to be clearly identified with an explanation.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

The PSTF recommends that all Phase 3 planning standards be included in the Version 0 standards.

There appear to be two sets of criteria used to judge if a standard is appropriate for retention, or not, in the Version 0 standards. The Planning Standards are subjected to approval by the NERC Board of Trustees, field testing, and then reapproval. Yet many Operating Policies that have been converted to Version 0 have not been field tested but are considered acceptable.

What is the criteria being used to judge if a standard should be accepted into the Version 0 standards grouping?

The Version 0 (Operating) standards also need further clarifications for the reviewers as to which operating policies were field tested, or not, and/or approved by the NERC board. A list similar to the Planning Standards for Phase III and Phase IV would be appropriate for the operating policies as well.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

The PSTF recommends that several of the Phase IV standards be dropped at this time because of needed clarifications to the measurements (and possibly the standard statements).

(Another possibility is to include them all in the Version 0 standards but delay their application until after field testing. If dropped now, they will fall outside the system and will have to start over again — just a thought. Jean-Marie Gagnon of Canada suggests a similar approach.)

(Also see response to question 11 above.)

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051			The PSTF's specific comments on Version 0 Standard 051 will be emailed under separate cover for posting and review.
052.....071			Detailed comments on the remaining (planning) standards will be provided by the PC's Planning Standards Task Force by August 18 or earlier.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

- 1) Include the full Introduction section from the original Planning Standards into the Purpose section of the Version 0 standards to provide more detail on the reasons for the standard. It is important that the purpose(s) and reason(s) for the standards are clearly stated and retained in the Version 0 standards.**
- 2) Add the actual standard statements of the original planning standards to the standard “sections” of the Version 0 standards. As posted, several of the Version 0 standards do not include the standard statements of the original planning standards. The original standard statements should be retained in the Version 0 standards and should be identified as such. Changes to the standard statements should be only through the use of the NERC ANSI-approved Standards process.**
- 3) The terminology of the NERC Reliability Functional Model should be incorporated into the Version 0 standards. In this regard, the question is raised if the Regions should be mentioned in the Version 0 standards. For example, standard 051 should apply to Transmission Planners and Transmission Owners who should report to their respective Planning Authorities. Reporting may also be required by the Regions or other Compliance Monitors in addition to the Planning Authorities. In such cases, the Regions may need to register as Planning Authorities and Compliance Monitors.**
- 4) The guidelines that were developed and approved in connection with the original planning standards have been added at the end of the Version 0 standard 051 (before Table I) for assistance to the users in the implementation of the standard and informational purposes. These guidelines, having been accepted by industry and approved by the NERC Board of Trustees, need to be retained and associated with the standard(s) that they were designed to specifically address. A clear statement that the guidelines are informational and not enforceable would need to be added to the standards form.**
- 5) The Glossary of Terms developed for application to the Planning Standards should be retained in the Version 0 (planning) standards document.**

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Standard	051	Compliance Templates I.A.M1 I.A.M2 I.A.M3 I.A.M4	I. System Adequacy and Security A. Transmission Systems	
Title	Transmission System Adequacy and Security <u>(This standard includes four parts identified as Standard Sections 1, 2, 3, and 4.)</u>	Section	I. System Adequacy and Security A. Transmission Systems	
Purpose(s)	<p><u>The fundamental purpose of the interconnected transmission systems is to move electric power from areas of generation to areas of customer demand (load). These systems should be capable of performing this function under a wide variety of expected system conditions (e.g., forced and planned equipment outages, continuously varying customer demands) while continuing to operate reliably within equipment and electric system thermal, voltage, and stability limits.</u></p> <p><u>Electric systems must be planned to withstand the more probable forced and planned outage system contingencies at projected customer demand and projected electricity transfer levels.</u></p> <p><u>Extreme but less probable contingencies measure the robustness of the electric systems and should be evaluated for risks and consequences. The risks and consequences of these contingencies should be reviewed by the entities responsible for the reliability of the interconnected transmission systems. Actions to mitigate or eliminate the risks and consequences are at the discretion of those entities.</u></p>	Introduction for I.A	System simulations and associated assessments are needed periodically to ensure that reliable systems are developed with sufficient lead time and continue to be modified or upgraded as necessary to meet present and future system needs.	Last paragraph of Introduction for I.A

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p><u>The ability of the interconnected transmission systems to withstand probable (Sections 1, 2, and 3 of this standard) and extreme contingencies (Section 4 of this standard) must be determined by simulated testing of the systems as prescribed in this Transmission System Adequacy and Security Standard.</u></p> <p>System simulations and associated assessments are needed periodically to ensure that reliable systems are developed with sufficient lead time and continue to be modified or upgraded as necessary to meet present and future system needs.</p>			
Effective Date	February 8, 2005	Approval Dates	CTTF Revised Compliance Templates I.A.M1, I.A.M2, I.A.M3 and I.A.M4 – NERC BOT approved April 2, 2004	
Standard Applicability	For Sections 1, 2, 3 and 4: <u>Planning Authority and Transmission Planners and Transmission Owners.</u>	Applicability	I.A.M1 - Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS). I.A.M2 - Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS). I.A.M3 - Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS). I.A.M4 - Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS).	
<u>Standard</u> Section 1	<p>System performance assessment under normal (no contingency) conditions.</p> <p><u>The interconnected transmission systems shall be planned, designed, and constructed such that with all transmission facilities in service and with normal (pre-contingency) operating procedures in effect, the network can deliver generator unit output to meet projected customer demands and projected firm (non-recallable reserved) transmission services, at all demand</u></p>	Brief Descriptions I.A.M1	System performance under normal (no contingency) conditions	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p><u>levels over the range of forecast system demands, under the conditions defined in Category A of Table I (attached).</u></p> <p><u>Transmission system capability and configuration, reactive power resources, protection systems, and control devices shall be adequate to ensure the system performance prescribed in Table I.</u></p>			
Section 1 Applicability	Planning Authority and Transmission Planners and Transmission Owners.	I.A.M1 Applicable to	Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS).	
Section 1 Requirements	<p><u>R1-1. Transmission Planners and Transmission Owners responsible for the reliability of the interconnected transmission systems shall ensure that the system responses for Standard Section 1 are as defined in Category A (no contingencies) of Table I (attached) and summarized below:</u></p> <p><u>a. Line and equipment loadings shall be within applicable thermal rating limits.</u></p> <p><u>b. Voltage levels shall be maintained within applicable limits.</u></p> <p><u>c. All customer demands shall be supplied, and all projected firm (non-recallable reserved) transfers shall be maintained.</u></p> <p><u>d. Stability of the network shall be maintained.</u></p>	<p>I.A.M1 Standard</p> <p>I.A. M1 Assessment Requirements</p>	<p>S1. The interconnected transmission systems shall be planned, designed, and constructed such that with all transmission facilities in service and with normal (pre-contingency) operating procedures in effect, the network can deliver generator unit output to meet projected customer demands and projected firm (non-recallable reserved) transmission services, at all demand levels over the range of forecast system demands, under the conditions defined in Category A of Table I (attached).</p> <p>Transmission system capability and configuration, reactive power resources, protection systems, and control devices shall be adequate to ensure the system performance prescribed in Table I.</p> <p>Assessment Requirements</p> <p>Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS), as</p>	<p>The content of S1 is repeated and detailed more completely in the M1 measurement and therefore not used directly in translation.</p>

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p>R1-12. Assessment Requirements</p> <p>The Planning Authority and Transmission Planners and Transmission Owners shall each assess the performance of their systems in meeting <u>the requirements of</u> this Reliability Standard <u>Section 1</u>.</p> <p>To be valid and compliant, assessments shall:-</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons, 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region that addresses the plan year being assessed and -showing shows system performance following meeting Category A of Table 1-1 (no contingencies), that addresses the plan year being assessed, 4. Address any planned upgrades needed to meet the 	I.A.M1 System Simulation Study/Testing Methods	<p>determined by the Region, for example:</p> <ol style="list-style-type: none"> 1. Transmission owners, 2. Independent system operators (ISOs), 3. Regional transmission organizations (RTOs), <p>Or other groups responsible for planning the bulk electric system shall assess the performance of their systems in meeting Standard S1.</p> <p>To be valid <i>and compliant</i>, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons, 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region showing system performance following Category A of Table 1 (no contingencies) that addresses the plan year being assessed, 4. Address any planned upgrades needed to meet the performance requirements of Category A. <p>System Simulation Study/Testing Methods</p> <p>System simulation studies/testing shall (as agreed to by the Region):</p> <ol style="list-style-type: none"> 1. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 2. Be conducted annually unless changes to system 	Reference to Standard S1 was replaced with “this Reliability Standard”.

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p>performance requirements of Category A <u>of Table I.</u></p> <p>System Simulation Study/Testing MethodsRequirements</p> <p>System simulation studies/testing shall (as agreed to by the Region):</p> <ol style="list-style-type: none"> 1. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 2. Be conducted annually unless changes to system conditions do not warrant such analyses. 3. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions. 4. Have established normal (pre-contingency) operating procedures in place. 5. Have all projected firm transfers modeled. 6. Be performed for selected demand levels over the range of forecast system demands. 7. Demonstrate that system performance meets Table 1 for Category A (no contingencies). 8. Include existing and planned facilities. 9. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance <u>as defined in Table I for</u> 	I.A. M1 Corrective Plan Requirements	<p>conditions do not warrant such analyses.</p> <ol style="list-style-type: none"> 3. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions. 4. Have established normal (pre-contingency) operating procedures in place. 5. Have all projected firm transfers modeled. 6. Be performed for selected demand levels over the range of forecast system demands. 7. Demonstrate that system performance meets Table 1 for Category A (no contingencies). 8. Include existing and planned facilities. 9. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance. <p>Corrective Plan Requirements</p> <p>When system simulations indicate an inability of the systems to respond as prescribed in this Measurement (M1), responsible entities shall:</p> <ol style="list-style-type: none"> 1. Provide a written summary of their plans to achieve the required system performance as described above throughout the planning horizon: <ol style="list-style-type: none"> a. Including a schedule for implementation, b. Including a discussion of expected required in-service dates of facilities, 	<p>Changed reference to Requirement R1-1 instead of Measurement M1</p>

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p><u>Category A (no contingencies).</u></p> <p>R1-23. Corrective Plan Requirements</p> <p>When system simulations indicate an inability of the systems to respond as prescribed in Reliability Standard 051-R1-1 <u>and R1-2</u>, the responsible Planning Authority and Transmission Planners <u>and Transmission Owners</u> shall:</p> <ol style="list-style-type: none"> 1. Provide a written summary of its <u>their</u> plans to achieve the required system performance as described above in R1-1 and R1-2 throughout the planning horizon: <ol style="list-style-type: none"> a. Including a schedule for <u>plan</u> implementation, b. Including a discussion of expected required in-service dates of facilities, c. Consider lead times necessary to implement plans. 2. For identified system facilities for which sufficient lead times exist, review in subsequent annual assessments for continuing need—detailed implementation plans are not needed. <u>The identified system facilities shall be reviewed for continuing need in subsequent annual assessments.</u> <p>R1-34. Reporting Requirements</p> <p>The documentation of results of these reliability assessments and corrective plans <u>(if necessary)</u> shall annually be provided to the entities' respective <u>planning authority and the</u> NERC Region(s), as required by the</p>	I.A. M1 Reporting Requirements	<ol style="list-style-type: none"> c. Consider lead times necessary to implement plans. 2. For identified system facilities for which sufficient lead times exist, review in subsequent annual assessments for continuing need — detailed implementation plans are not needed. <p>Reporting Requirements</p> <p>The documentation of results of these reliability assessments and corrective plans shall annually be provided to the entities' respective NERC Region(s), as required by the Region. Each Region, in turn, shall annually provide a report of its reliability assessments and corrective actions to NERC.</p>	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	Region. Each Region, in turn, shall annually provide a <u>summary</u> report (per Standard 052) of its reliability assessments and corrective actions <u>plans (if necessary)</u> to NERC.			
Section 1 Measures	<p>M1-1. The Planning Authority and Transmission Planners <u>and Transmission Owners</u> shall provide evidence that it <u>they have</u> provided <u>reliability</u> assessments and corrective plans <u>(if necessary)</u> for the systems responses for which they are responsible per Standard 051 R1-1, and R1-2, <u>and</u> R1-3.</p> <p>M1-2. The Planning Authority and Transmission Planners <u>and Transmission Owners</u> shall provide evidence that it <u>they have</u> reported documentation of results of its <u>their</u> reliability assessments and corrective plans <u>(if necessary)</u> per Standard 051 R1-34.</p>	IAM1 Items to be -- Measured	System performance under normal (no contingency) conditions.	Added words “assessments and corrective plans” to the language to make a measurable standard. Added reference to this Reliability Standard and its requirements.
Section 1 Regional Differences	None identified	None	None identified	
Section 1 Compliance Monitoring Process	<p><u>Timeframe:</u> Annually</p> <p>Compliance Monitor: Regional Reliability Council. <u>Planning Authority or other Compliance Monitor.</u> Each Region <u>Compliance Monitor</u> shall report compliance and violations to NERC via the NERC Compliance Reporting Process.</p>	IAM1 Timeframe Compliance Monitoring Responsibility	Annually Regional Reliability Council. Each Region shall report compliance and violations to NERC via the NERC Compliance Reporting Process.	
Section 1 Levels of Non Compliance	(If non-compliant at more than one Level, the highest Level applies.) Level 1 — N/A.	IAM1 Levels of non-	(If non-compliant at more than one Level, the highest Level applies.) Level 1 — N/A.	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p>Level 2 — A valid assessment (and corrective plan, <u>if necessary</u>) for the longer-term planning horizon is not available.</p> <p>Level 3 — N/A</p> <p>Level 4 — A valid assessment (and corrective plan, <u>if necessary</u>) for the near-term planning horizon is not available.</p>	compliance	<p>Level 2 — A valid assessment and corrective plan for the longer-term planning horizon is not available.</p> <p>Level 3 — N/A</p> <p>Level 4 — A valid assessment and corrective plan for the near-term planning horizon is not available.</p>	
<u>Standard</u> Section 2	<p>System performance following loss of a single bulk system element.</p> <p><u>The interconnected transmission systems shall be planned, designed, and constructed such that the network can be operated to supply projected customer demands and projected firm (non-recallable reserved) transmission services, at all demand levels over the range of forecast system demands, under the contingency conditions as defined in Category B of Table I (attached).</u></p> <p><u>Transmission system capability and configuration, reactive power resources, protection systems, and control devices shall be adequate to ensure the system performance prescribed in Table I.</u></p> <p><u>The transmission systems also shall be capable of accommodating planned bulk electric equipment outages and continuing to operate within thermal, voltage, and stability limits under the contingency conditions as defined in Category B of Table I (attached).</u></p>	Brief Descriptions I.A.M2	System performance following loss of a single bulk system element	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 2 Applicability	Planning Authority and Transmission Planners <u>and Transmission Owners.</u>	I.A.M2 Applicable to	Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS).	
Section 2 Requirements	<p><u>R2-1. Transmission Planners and Transmission Owners responsible for the reliability of the interconnected transmission systems shall ensure that the system responses for Standard Section 2 contingencies are as defined in Category B (event resulting in the loss of a single element) of Table I (attached) and summarized below:</u></p> <p><u>a. Line and equipment loadings shall be within applicable rating limits.</u></p> <p><u>b. Voltage levels shall be maintained within applicable limits.</u></p> <p><u>c. No loss of customer demand (except as noted in Table I, footnote b) shall occur, and no projected firm (non-recallable reserved) transfers shall be curtailed.</u></p> <p><u>d. Stability of the network shall be maintained.</u></p> <p><u>e. Cascading outages shall not occur.</u></p>	<p>Standard for I.A.M2</p> <p>IAM2 Assessment Requirements</p>	<p>S2. The interconnected transmission systems shall be planned, designed, and constructed such that the network can be operated to supply projected customer demands and projected firm (non-recallable reserved) transmission services, at all demand levels over the range of forecast system demands, under the contingency conditions as defined in Category B of Table I (attached).</p> <p>Transmission system capability and configuration, reactive power resources, protection systems, and control devices shall be adequate to ensure the system performance prescribed in Table I.</p> <p>The transmission systems also shall be capable of accommodating planned bulk electric equipment outages and continuing to operate within thermal, voltage, and stability limits under the contingency conditions as defined in Category B of Table I (attached).</p> <p>Assessment Requirements</p> <p>Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS), for example:</p> <ol style="list-style-type: none"> 1. Transmission owners, 2. Independent system operators (ISOs), 	The content of S2 is repeated and detailed more completely in the M2 measurement and therefore not used directly in translation.

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p>R2-12. Assessment Requirements</p> <p>Planning Authorities and Transmission Planners <u>and</u> <u>Transmission Owners</u> shall assess the performance of their systems in meeting the requirements of this Reliability Standard <u>Section 2</u>.</p> <p>To be valid and compliant, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons, 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region that addresses the plan year being addressed and showings system performance following meeting Category B contingencies that addresses the plan year being assessed <u>of Table I</u>, 4. Address any planned upgrades needed to meet the performance requirements of Category B <u>of Table I</u>, 5. Consider all contingencies applicable to Category B <u>of Table I</u>. 	I.A.M2 System Simulation Study/Testing Methods	<p>3. Regional transmission organizations (RTOs). Or other groups responsible for planning the bulk electric system shall assess the performance of their systems in meeting Standard S2.</p> <p>To be valid <i>and compliant</i>, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons, 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region showing system performance following Category B contingencies that addresses the plan year being assessed, 4. Address any planned upgrades needed to meet the performance requirements of Category B, 5. Consider all contingencies applicable to Category B. <p>System Simulation Study/Testing Methods</p> <p>System simulation studies/testing shall:</p> <ol style="list-style-type: none"> 1. Be performed and evaluated only for those Category B contingencies that would produce the more severe system results or impacts: <ol style="list-style-type: none"> a. The rationale for the contingencies selected for evaluation shall be available as supporting information, 	Reference to Standard S2 was replaced with “this Reliability Standard”.

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p>System Simulation Study/Testing <u>Methods Requirements</u></p> <p>System simulation studies/testing shall:</p> <ol style="list-style-type: none"> 1. Be performed and evaluated only for those Category B contingencies that would produce the more severe system results or impacts: <ol style="list-style-type: none"> a. The rationale for the contingencies selected for evaluation shall be available as supporting information, b. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information. 2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 3. Be conducted annually unless changes to system conditions do not warrant such analyses. 4. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions. 		<ol style="list-style-type: none"> b. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information. 2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 3. Be conducted annually unless changes to system conditions do not warrant such analyses. 4. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions. 5. Have all projected firm transfers modeled. 6. Be performed and evaluated for selected demand levels over the range of forecast system demands. 7. Demonstrate that system performance meets Table 1 for Category B contingencies. 8. Include existing and planned facilities. 9. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance. 10. Include the effects of existing and planned protection systems, including any backup or redundant systems. 11. Include the effects of existing and planned 	

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	<p>5. Have all projected firm transfers modeled.</p> <p>6. Be performed and evaluated for selected demand levels over the range of forecast system demands.</p> <p>7. Demonstrate that system performance meets Table 1 for Category B contingencies.</p> <p>8. Include existing and planned facilities.</p> <p>9. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance <u>as defined in Table I for Category B contingencies.</u></p> <p>10. Include the effects of existing and planned protection systems, including any backup or redundant systems, <u>to ensure system performance as defined in Table I for Category B contingencies.</u></p> <p>11. Include the effects of existing and planned control devices <u>to ensure system performance as defined in Table I for Category B contingencies.</u></p> <p>12. Include-Accommodate the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed <u>and also be capable of system performance as defined in Table I of Category B contingencies.</u></p>	<p>I.A. M2 Corrective Plan Requirements</p> <p>I.A. M2 Reporting Requirements</p>	<p>control devices.</p> <p>12. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed</p> <p>Corrective Plan Requirements</p> <p>When system simulations indicate an inability of the systems to respond as prescribed in this Measure (M2), responsible entities shall:</p> <ol style="list-style-type: none"> 1. Provide a written summary of their plans to achieve the required system performance as described above throughout the planning horizon, <ol style="list-style-type: none"> a. Including a schedule for implementation, b. Including a discussion of expected required in-service dates of facilities, c. Consider lead times necessary to implement plans. 2. For identified system facilities for which sufficient lead times exist, review in subsequent annual assessments for continuing need — detailed implementation plans are not needed. <p>Reporting Requirements</p> <p>The documentation of results of these reliability</p>	<p>Changed reference to Requirement R2-1 instead of Measurement M2</p>

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	<p>R2-23. Corrective Plan Requirements</p> <p>When system simulations indicate an inability of the systems to respond as prescribed in Requirement Reliability Standard 051-R2-1 and R2-2, the responsible Planning Authorities and Transmission Owners-Planners and Transmission Owners responsible for planning the bulk electric system shall:</p> <ol style="list-style-type: none"> 1. Provide a written summary of their plans to achieve the required system performance as described above in R2-1 and R2-2 throughout the planning horizon: <ol style="list-style-type: none"> a. Including a schedule for plan implementation, b. Including a discussion of expected required in-service dates of facilities, c. Consider lead times necessary to implement plans. 2. For identified system facilities for which sufficient lead times exist, review in subsequent annual assessments for continuing need—detailed implementation plans are not needed. <u>The identified system facilities shall be reviewed for continuing need in subsequent annual assessments.</u> <p>R2-34. Reporting Requirements</p> <p>The documentation of results of these reliability assessments and corrective plans (if necessary) shall annually be provided to the entities' respective Planning Authority and the NERC Region(s), as required by the Region. Each Region, in turn, shall annually provide a</p>		<p>assessments and corrective plans shall annually be provided to the entities' respective NERC Region(s), as required by the Region. Each Region, in turn, shall annually provide a report of its reliability assessments and corrective actions to NERC.</p>	

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	<u>summary</u> report (per Standard 052) of its reliability assessments and corrective actions-plans (if necessary) to NERC.			
Section 2 Measures	<p>M2-1 The Planning Authority and Transmission Planners and <u>Transmission Owners</u> shall provide evidence that it-they have provided assessments and corrective plans for the systems responses for which they are responsible per Standard 051 R2-1, and R2-2, and R2-3.</p> <p>M2-2 The Planning Authority and Transmission Planners and <u>Tranmission Owners</u> shall provide evidence that it-they have reported documentation of results of its-their reliability assessments and corrective plans (if necessary) per Standard 051-R1-4.</p>	IAM2 Items to be -- Measured	Assessments supported by simulated system performance following loss of a single bulk system element.	Added words “available assessments and corrective plans” to the language to make a measurable standard. Changed reference from S2 to this Reliability Standard.
Section 2 Regional Differences	None identified	None	None identified	
Section 2 Compliance Monitoring Process	<p><u>Timeframe:</u> Annually</p> <p>Compliance Monitor: Regional Reliability Council <u>Planning Authority or other Compliance Monitor.</u> Each Region <u>Compliance Monitor</u> shall report compliance and violations to NERC via the NERC Compliance Reporting Process.</p>	IAM2 Timeframe Compliance Monitoring Responsibility	<p>Annually</p> <p>Regional Reliability Council. Each Region shall report compliance and violations to NERC via the NERC Compliance Reporting Process.</p>	
Section 2 Levels of Non Compliance	<p>(If non-compliant at more than one Level, the highest Level applies.)</p> <p>Level 1 — N/A.</p> <p>Level 2 — A valid assessment (and corrective plan, <u>if</u></p>	IAM2 Levels of Non-Compliance	<p>(If non-compliant at more than one Level, the highest Level applies.)</p> <p>Level 1 — N/A.</p> <p>Level 2 — A valid assessment and corrective plan, as</p>	

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	<p><u>necessary</u>) for the longer-term planning horizon is not available.</p> <p>Level 3 — N/A</p> <p>Level 4 — A valid assessment (and corrective plan, <u>if necessary</u>) for the near-term planning horizon is not available.</p>		<p>defined above, for the longer-term planning horizon is not available.</p> <p>Level 3 — N/A</p> <p>Level 4 — A valid assessment and corrective plan, as defined above, for the near-term planning horizon is not available.</p>	
<p><u>Standard</u> Section 3</p>	<p>System performance following loss of two or more bulk system elements.</p> <p><u>The interconnected transmission systems shall be planned, designed, and constructed such that the network can be operated to supply projected customer demands and projected firm (non-recallable reserved) transmission services, at all demand levels over the range of forecast system demands, under the conditions of the contingencies as defined in Category C of Table I (attached). The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard.</u></p> <p><u>Transmission system capability and configuration, reactive power resources, protection systems, and control devices shall be adequate to ensure the system performance prescribed in Table I.</u></p> <p><u>The transmission systems also shall be capable of accommodating planned bulk electric equipment outages and continuing to operate within thermal, voltage, and stability limits under the conditions of the contingencies as defined in Category</u></p>	<p>Brief Descriptions I.A.M3</p>	<p>System performance following loss of two or more bulk system elements</p>	

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	<u>C of Table I (attached).</u>			
Section 3 Applicability	Planning Authority and <u>Transmission Planners and Transmission Owners.</u>	I.A.M3 Applicable to	Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS).	
Section 3 Requirements	<u>R3-1. Transmission Planners and Transmission Owners responsible for the reliability of the interconnected transmission systems shall ensure that the system responses for Standard Section 3 are as defined in Category C (event(s) resulting in the loss of two or more elements) of Table I (attached) and summarized below:</u> <p><u>a. Line and equipment loadings shall be within applicable thermal rating limits.</u></p> <p><u>b. Voltage levels shall be maintained within applicable limits.</u></p> <p><u>c. Planned (controlled) interruption of customer demand or generation (as noted in Table I, footnote d) may occur, and contracted firm (non-recallable reserved) transfers may be curtailed.</u></p> <p><u>d. Stability of the network shall be maintained.</u></p> <p><u>e. Cascading outages shall not occur.</u></p>	Standard for IAM3	<p>S3. The interconnected transmission systems shall be planned, designed, and constructed such that the network can be operated to supply projected customer demands and projected firm (non-recallable reserved) transmission services, at all demand levels over the range of forecast system demands, under the contingency conditions as defined in Category C of Table I (attached). The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers may be necessary to meet this standard.</p> <p>Transmission system capability and configuration, reactive power resources, protection systems, and control devices shall be adequate to ensure the system performance prescribed in Table I.</p> <p>The transmission systems also shall be capable of accommodating planned bulk electric equipment outages and continuing to operate within thermal, voltage, and stability limits under the contingency conditions as defined in Category C of Table I (attached).</p>	The content of S3 is repeated and detailed more completely in the M3 measurement and therefore not used directly in translation.

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		I.A. M3 Assessment Requirements	<p>Assessment Requirements</p> <p>Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS), as determined by the Region, for example:</p> <ol style="list-style-type: none"> 1. Transmission owners, 2. Independent system operators (ISOs), 3. Regional transmission organizations (RTOs). <p>Or other groups responsible for planning the bulk electric system shall assess the performance of their systems in meeting Standard S3.</p> <p>To be valid <i>and compliant</i>, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons, 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region showing system performance following Category C contingencies that addresses the plan year being assessed, 4. Address any planned upgrades needed to meet the performance requirements of Category C, 5. Consider all contingencies applicable to Category C. 	Reference to Standard S3 was replaced with “this Reliability Standard”.

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	<p>R3-12. Assessment Requirements</p> <p>Planning Authorities and Transmission Planners <u>and</u> <u>Transmission Owners</u> shall assess the performance of their systems in meeting the requirements of this Reliability Standard <u>Section 3</u>.</p> <p>To be valid and compliant, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons, 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region<u>that addresses the plan year being assessed and show</u>ings system performance following meeting Category C contingencies that addresses the plan year being assessed of <u>Table I</u>, 4. Address any planned upgrades needed to meet the performance requirements of Category C <u>of Table I</u>, 5. Consider all contingencies applicable to Category C <u>of Table I</u>. <u>These contingencies include those for which the initiating event results in the loss of two or more elements, or two separate events occur resulting in two or more elements out of service with time for manual system adjustments between events.</u> 	I.A.M3 System Simulation Study/Testing Methods	<p>System Simulation Study/Testing Methods</p> <p>System simulation studies/testing shall:</p> <ol style="list-style-type: none"> 1. Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. <ol style="list-style-type: none"> a. The rationale for the contingencies selected for evaluation shall be available as supporting information, b. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information. 2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 3. Be conducted annually unless changes to system conditions do not warrant such analyses. 4. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions. 5. Have all projected firm transfers modeled. 6. Be performed and evaluated for selected demand levels over the range of forecast system demands. 7. Demonstrate that system performance meets 	
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	<p>System Simulation Study/Testing <u>Methods Requirements</u></p> <p>System simulation studies/testing shall:</p> <ol style="list-style-type: none"> 1. Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts: <ol style="list-style-type: none"> a. The rationale for the contingencies selected for evaluation shall be available as supporting information, b. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information. 2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 3. Be conducted annually unless changes to system conditions do not warrant such analyses. 4. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions. 5. Have all projected firm transfers modeled. 6. Be performed and evaluated for selected demand levels over the range of forecast system demands. 7. Demonstrate that system performance meets Table 1 for Category C contingencies. 	I.A. M3 Corrective Plan Requirements	<p>Table 1 for Category C contingencies.</p> <ol style="list-style-type: none"> 8. Include existing and planned facilities. 9. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance. 10. Include the effects of existing and planned protection systems, including any backup or redundant systems. 11. Include the effects of existing and planned control devices. 12. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed <p>Corrective Plan Requirements</p> <p>When system simulations indicate an inability of the systems to respond as prescribed in this Measure (M3), responsible entities shall:</p> <ol style="list-style-type: none"> 1 Provide a written summary of their plans to achieve the required system performance as described above throughout the planning horizon, <ol style="list-style-type: none"> a. Including a schedule for implementation, b. Including a discussion of expected required in-service dates of facilities, 	<p>Changed reference to Requirement R3-1 instead of Measurement M3</p>

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	<p>8. Include existing and planned facilities.</p> <p>9. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance <u>as defined in Table I for Category C contingencies</u>.</p> <p>10. Include the effects of existing and planned protection systems, including any backup or redundant systems, <u>to ensure system performance as defined in Table I for Category C contingencies</u>.</p> <p>11. Include the effects of existing and planned control devices <u>to ensure system performance as defined in Table I for Category C contingencies</u>.</p> <p>12. Include <u>Accommodate</u> the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed <u>and also be capable of system performance as defined in Table I for Category C contingencies</u>.</p> <p>R3-23. Corrective Plan Requirements</p> <p>When system simulations indicate an inability of the systems to respond as prescribed in Requirement 3-4 <u>Reliability Standard 051-R3-1 and R3-2</u>, the responsible Planning Authorities and Transmission Owners Planners and Transmission Owners <u>responsible for planning the</u></p>	I.A. M3 Reporting Requirements	<p>c. Consider lead times necessary to implement plans.</p> <p>2 For identified system facilities for which sufficient lead times exist, review in subsequent annual assessments for continuing need — detailed implementation plans are not needed.</p> <p>Reporting Requirements</p> <p>The documentation of results of these reliability assessments and corrective plans shall annually be provided to the entities' respective NERC Region(s), as required by the Region. Each Region, in turn, shall annually provide a report of its reliability assessments and corrective actions to NERC.</p>	

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	<p>bulk electric system shall:</p> <ol style="list-style-type: none"> Provide a written summary of their plans to achieve the required system performance as described above in R3-1 and R3-2 throughout the planning horizon: <ol style="list-style-type: none"> Including a schedule for <u>plan</u> implementation, Including a discussion of expected required in-service dates of facilities, Consider lead times necessary to implement plans. For identified system facilities for which sufficient lead times exist, review in subsequent annual assessments for continuing need—detailed implementation plans are not needed. <u>The identified system facilities shall be reviewed for continuing need in subsequent annual assessments.</u> <p>R3-34. Reporting Requirements</p> <p>The documentation of results of these reliability assessments and corrective plans <u>(if necessary)</u> shall annually be provided to the entities’ respective <u>Planning Authority and the</u> NERC Region(s), as required by the Region. Each Region, in turn, shall annually provide a <u>summary</u> report <u>(per Standard 052)</u> of its reliability assessments and corrective actions-plans <u>(if necessary)</u> to NERC.</p>			
Section 3 Measures	M3-1 The Planning Authority and Transmission Planners <u>and Transmission Owners</u> shall provide evidence that it <u>they have</u> provided assessments and corrective plans <u>(if necessary)</u> for the	IAM3 Items to be -- Measured	Assessments supported by simulated system performance following loss of two or more bulk system element.	Added words “available assessments and corrective plans” to the language to

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	<p>systems responses for which they are responsible per Standard 051 R3-1 and R3-2, and R3-3.</p> <p>M3-2 The Planning Authority and Transmission Planners and <u>Transmission Owners</u> shall provide evidence that it <u>they have</u> reported documentation of results of its <u>their</u> reliability assessments and corrective plans <u>(if necessary) per Standard 051-R3-4.</u></p>			make a measurable standard. Changed reference from S3 to this Reliability Standard.
Section 3 Regional Differences	None identified	None	None identified	
Section 3 Compliance Monitoring Process	<p><u>Timeframe:</u> Annually</p> <p><u>Compliance Monitor: Regional Reliability Council-Planning Authority. Each Compliance Monitor shall report compliance and violations to NERC via the NERC Compliance Reporting Process.</u></p>	<p>IAM3 Timeframe</p> <p>Compliance Monitoring Responsibility</p>	<p>Annually</p> <p>Regional Reliability Council.</p>	
Section 3 Levels of Non Compliance	<p>(If non-compliant at more than one Level, the highest Level applies.)</p> <p>Level 1 — N/A.</p> <p>Level 2 — A valid assessment <u>(and corrective plan, if necessary)</u> for the longer-term planning horizon is not available.</p> <p>Level 3 — N/A</p> <p>Level 4 — A valid assessment <u>(and corrective plan, if necessary)</u></p>	<p>IAM3 Levels of Non-Compliance</p>	<p>(If non-compliant at more than one Level, the highest Level applies.)</p> <p>Level 1 — N/A.</p> <p>Level 2 — A valid assessment and corrective plan, as defined above, for the longer-term planning horizon is not available.</p> <p>Level 3 — N/A</p> <p>Level 4 — A valid assessment and corrective plan, as defined</p>	

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	for the near-term planning horizon is not available.		above, for the near-term planning horizon is not available.	
<u>Standard Section 4</u>	System performance following extreme events resulting in the loss of two or more bulk system elements. <u>The interconnected transmission systems shall be evaluated for the risks and consequences of a number of each of the extreme contingencies that are listed under Category D of Table I (attached).</u>	Brief Descriptions I.A.M4	System performance following extreme events resulting in the loss of two or more bulk system elements	
Section 4 Applicability	Planning Authority and Transmission Planners and Transmission Owners.	I.A.M4 Applicable to	Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS).	
Section 4 Requirements	<u>R4-1. Transmission Planners and Transmission Owners responsible for the reliability of the interconnected transmission systems shall assess the risks and system responses for Standard Section 4 as defined in Category D of Table I (attached).</u>	Standard for I.A.M4 I.A. M4 Assessment Requirements	S4. The interconnected transmission systems shall be evaluated for the risks and consequences of a number of each of the extreme contingencies that are listed under Category D of Table I (attached). Assessment Requirements Entities Responsible for the Reliability of Interconnected transmission Systems (ERRIS), as determined by the Region, for example: 1. Transmission owners, 2. Independent system operators (ISOs), 3. Regional transmission organizations	The content of S4 is repeated and detailed more completely in the M4 measurement and therefore not used directly in translation.

¹ Corrective Plan Requirements: None required.

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	<p>R4-12. Assessment Requirements ¹</p> <p>Planning Authorities and Transmission Planners <u>and</u> Transmission Owners shall assess the performance of their systems in meeting the requirements of this Reliability Standard <u>Section 4</u>.</p> <p>To be valid and compliant, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for <u>the</u> near-term (years one through five) <u>planning horizon</u>, 3. Be supported by a current or past study and/or system simulation testing <u>that addresses the plan year being assessed and as accepted by the Region showing evaluates the</u> system performance following Category D contingencies that addresses the plan year being assessed; 4. Consider <u>all a number of each of the extreme</u> contingencies applicable to <u>listed under</u> Category D <u>of Table I. A Category D contingency is an extreme event resulting in two or more (multiple) elements removed or cascading out of service.</u> 	I.A.M4 System Simulation Study/Testing Methods	<p>(RTOs).</p> <p>Or other groups responsible for planning the bulk electric system shall assess the performance of their systems in meeting Standard S4.</p> <p>To be valid <i>and compliant</i>, assessments shall:</p> <ol style="list-style-type: none"> 1. Be made annually, 2. Be conducted for near-term (years one through five), 3. Be supported by a current or past study and/or system simulation testing as accepted by the Region showing system performance following Category D contingencies that addresses the plan year being assessed, 4. Consider all contingencies applicable to Category D. <p>System Simulation Study/Testing Methods</p> <p>System simulation studies/testing shall (as agree to by the Region) :</p> <ol style="list-style-type: none"> 1. Be performed and evaluated only for those Category d contingencies that would produce the more severe system results or impacts. <ol style="list-style-type: none"> c. The rationale for the contingencies selected for evaluation shall be available as supporting information, 	Reference to Standard S4 was replaced with “this Reliability Standard”.

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	<p>System Simulation Study/Testing Methods<u>Requirements</u></p> <p>System simulation studies/testing shall<u>shall</u> (as agree to by the Region):</p> <ol style="list-style-type: none"> 1. Be performed and evaluated only for those Category 4<u>D</u> contingencies that would produce the more severe system results or impacts. <ol style="list-style-type: none"> a. The rationale for the contingencies selected for evaluation shall be available as supporting information, b. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information. 2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 3. Be conducted annually unless changes to system conditions do not warrant such analyses. 4. Have all projected firm transfers modeled. 5. Include existing and planned facilities. 6. Include <u>the effects of existing and planned reactive power resources</u> to ensure that adequate reactive resources are available to meet system performance. 7. Include the effects of existing and planned protection systems, including any backup or redundant systems. 	.A. M4 Corrective Plan	<ol style="list-style-type: none"> d. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information. 2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. 3. Be conducted annually unless changes to system conditions do not warrant such analyses. 4. Have all projected firm transfers modeled. 5. Include existing and planned facilities. 6. Include reactive power resources to ensure that adequate reactive resources are available to meet system performance. 7. Include the effects of existing and planned protection systems, including any backup or redundant systems. 8. Include the effects of existing and planned control devices. 9. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed 	

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	<p>8. Include the effects of existing and planned control devices.</p> <p>9. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed</p> <p><u>R4-3. Correction Plan Requirements</u></p> <p><u>None required.</u></p> <p><u>R4-24. Reporting Requirements</u> The documentation of results of these reliability assessments <u>and mitigation measures</u> shall annually be provided to the entities' respective <u>Planning Authority and the</u> NERC Region(s), as required by the Region.</p> <p><u>Each Region, in turn, shall annually provide a summary report (per Standard 052) of its reliability assessments to NERC.</u></p>	<p>Requirements</p> <p>I.A. M4 Reporting Requirements</p>	<p>Corrective Plan Requirements</p> <p>None required</p> <p>Reporting Requirements</p> <p>The documentation of results of these reliability assessments shall annually be provided to the entities' respective NERC Region(s), as required by the Region.</p>	
Section 4 Measures	M4-1. The Planning Authority and Transmission Planners <u>and Transmission Owners</u> shall provide <u>evidence that they have provided</u> assessments for the system responses per Standard 051	IAM4 Items to be Measured	Assessments of system performance for extreme events (more severe than in I.A.M3) resulting in loss of two or more bulk	Added words "have available assessments of" to the language to make a

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	<p>R3-1for which they are responsible per Standard 051 R4-1 and R4-2.</p> <p>M34-2. The Planning Authority and Transmission Planners and Transmission Owners shall provide evidence that itthey have reported documentation of results of itstheir reliability assessments per Standard 051 R4-14.</p>		system elements.	measurable standard. Changed reference from S4 to this Reliability Standard.
Section 4 Regional Differences	None identified	None	None identified	
Section 4 Compliance Monitoring Process	<p>Annually <u>Timeframe:</u> Annually</p> <p>Compliance Monitor: Regional Reliability Council.Planning Authority. Each RegionPlanning Authority shall report compliance and violations to NERC via the NERC Compliance Reporting Process.</p>	<p>IAM4 Timeframe</p> <p>Compliance-Monitoring Responsibility</p>	<p>Annually</p> <p>Regional Reliability Council. Each Region shall report compliance and violations to NERC via the NERC Compliance Reporting Process.</p>	
Section 4 Levels of Non Compliance	<p>Level 1 — A valid assessment, as defined above, for the near-term planning horizon is not available.</p> <p>Level 2 — N/A</p> <p>Level 3 — N/A</p> <p>Level 4 — N/A</p>	<p>IAM4</p> <p>Levels of non-compliance</p>	<p>(If non-compliant at more than one Level, the highest Level applies.)</p> <p>Level 1 — A valid assessment, as defined above, for the near-term planning horizon is not available.</p> <p>Level 2 — N/A</p> <p>Level 3 — N/A</p> <p>Level 4 — N/A</p>	No changes
<u>Guidelines</u>	<u>A number of guidelines to assist the planning authorities and transmission planners in the implementation of Standard 051 are listed below. These guidelines are informational only and</u>			

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	<p><u>compliance to the guidelines is not required.</u></p> <p><u>G1. The planning, development, and maintenance of transmission facilities should be coordinated with neighboring systems to preserve the reliability benefits of interconnected operations.</u></p> <p><u>G2. Studies affecting more than one system owner or user should be conducted on a joint interconnected system basis.</u></p> <p><u>G3. The interconnected transmission systems should be designed and operated such that reasonable and foreseeable contingencies do not result in the loss or unintentional separation of a major portion of the network.</u></p> <p><u>G4. The interconnected transmission systems should provide flexibility in switching arrangements, voltage control, and other protection system measures to ensure reliable system operation.</u></p> <p><u>G5. The assessment of transmission system capability and the need for system enhancements should take into account the maintenance outage plans of the transmission facility owners. These maintenance plans should be coordinated on an intra- and interregional basis.</u></p> <p><u>G6. The interconnected transmission systems should be planned to avoid excessive dependence on any one transmission circuit, structure, right-of-way, or substation.</u></p>			
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Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p><u>G7. Reliability assessments should examine post-contingency steady-state conditions as well as stability, overload, cascading, and voltage collapse conditions. Pre-contingency system conditions chosen for analysis should include contracted firm (non-recallable reserved) transmission services.</u></p> <p><u>G8. Annual updates to the transmission assessments should be performed, as appropriate, to reflect anticipated significant changes in system conditions.</u></p> <p><u>G9. Extreme contingency evaluations should be conducted to measure the robustness of the interconnected transmission systems and to maintain a state of preparedness to deal effectively with such events. Although it is not practical (and in some cases not possible) to construct a system to withstand all possible extreme contingencies without cascading, it is desirable to control or limit the scope of such cascading or system instability events and the significant economic and social impacts that can result.</u></p> <p><u>G10. It may be appropriate to conduct the extreme contingency assessments on a coordinated intra- or interregional basis so that all potentially affected entities are aware of the possibility of cascading or system instability events.</u></p>			

Table I. Transmission System Standards – Normal and Emergency Conditions*

Category	Contingencies	Elements Out of Service	System Limits or Impacts				
	Initiating Event(s) and Contingency Element(s)		Thermal Limits	Voltage Limits	System Stable	Loss of Demand or Curtailed Firm Transfers	Cascading ^c Outages
A - No Contingencies	All Facilities in Service	None	Applicable Rating ^a (A/R)	Applicable Rating ^a (A/R)	Yes	No	No
B - Event resulting in the loss of a single element.	Single Line Ground (SLG) or 3-Phase (3Ø) Fault, with Normal Clearing: 1. Generator 2. Transmission Circuit 3. Transformer Loss of an Element without a Fault.	Single Single Single Single	A/R A/R A/R A/R	A/R A/R A/R A/R	Yes Yes Yes Yes	No ^b No ^b No ^b No ^b	No No No No
	Single Pole Block, Normal Clearing ^f : 4. Single Pole (dc) Line	Single	A/R	A/R	Yes	No ^b	No
C - Event(s) resulting in the loss of two or more (multiple) elements.	SLG Fault, with Normal Clearing ^f : 1. Bus Section 2. Breaker (failure or internal fault)	Multiple Multiple	A/R A/R	A/R A/R	Yes Yes	Planned/Controlled ^d Planned/Controlled ^d	No No
	SLG or 3Ø Fault, with Normal Clearing ^f , Manual System Adjustments, followed by another SLG or 3Ø Fault, with Normal Clearing ^f : 3. Category B (B1, B2, B3, or B4) contingency, manual system adjustments, followed by another Category B (B1, B2, B3, or B4) contingency	Multiple	A/R	A/R	Yes	Planned/Controlled ^d	No
	Bipolar Block, with Normal Clearing ^f : 4. Bipolar (dc) Line	Multiple	A/R	A/R	Yes	Planned/Controlled ^d	No
	Fault (non 3Ø), with Normal Clearing ^f : 5. Any two circuits of a multiple circuit towerline ^g	Multiple	A/R	A/R	Yes	Planned/Controlled ^d	No
SLG Fault, with Delayed Clearing ^f (stuck breaker or protection system failure): 6. Generator 7. Transmission Circuit 8. Transformer 9. Bus Section	Multiple Multiple	A/R A/R	A/R A/R	Yes Yes	Planned/Controlled ^d Planned/Controlled ^d	No No	

~~* Any Region may implement standards that are more stringent, but not inconsistent with NERC's industry-wide standards (Generic statement that applies to all NERC standards and should be included in the introduction of the NERC Version "0" standards.)~~

Table I. Transmission System Standards – Normal and Emergency Conditions*

<p>D^e - Extreme event resulting in two or more (multiple) elements removed or cascading out of service</p>	<p>3Ø Fault, with Delayed Clearing^f (stuck breaker or protection system failure):</p> <table border="0"> <tr> <td>1. Generator</td> <td>3. Transformer</td> </tr> <tr> <td>2. Transmission Circuit</td> <td>4. Bus Section</td> </tr> </table> <p>-----</p> <p>3Ø Fault, with Normal Clearing^f:</p> <p>5. Breaker (failure or internal fault)</p> <p>-----</p> <p>Other:</p> <ol style="list-style-type: none"> 6. Loss of towerline with three or more circuits 7. All transmission lines on a common right-of way 8. Loss of a substation (one voltage level plus transformers) 9. Loss of a switching station (one voltage level plus transformers) 10. Loss of all generating units at a station 11. Loss of a large load or major load center 12. Failure of a fully redundant special protection system (or remedial action scheme) to operate when required 13. Operation, partial operation, or misoperation of a fully redundant special protection system (or remedial action scheme) in response to an event or abnormal system condition for which it was not intended to operate 14. Impact of severe power swings or oscillations from disturbances in another Regional Council. 	1. Generator	3. Transformer	2. Transmission Circuit	4. Bus Section	<p>Evaluate for risks and consequences.</p> <ul style="list-style-type: none"> ▪ May involve substantial loss of customer demand and generation in a widespread area or areas. ▪ Portions or all of the interconnected systems may or may not achieve a new, stable operating point. ▪ Evaluation of these events may require joint studies with neighboring systems.
1. Generator	3. Transformer					
2. Transmission Circuit	4. Bus Section					

- a) Applicable rating (A/R) refers to the applicable normal and emergency facility thermal rating or system voltage limit as determined and consistently applied by the system or facility owner. Applicable ratings may include emergency ratings applicable for short durations as required to permit operating steps necessary to maintain system control. All ratings must be established consistent with applicable NERC [Planning-Reliability](#) Standards addressing facility ratings.
- b) Planned or controlled interruption of electric supply to radial customers or some local network customers, connected to or supplied by the faulted element or by the affected area, may occur in certain areas without impacting the overall security of the interconnected transmission systems. To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted firm (non-recallable reserved) electric power transfers.
- c) Cascading is the uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread service interruption which cannot be restrained from sequentially spreading beyond an area predetermined by appropriate studies.
- d) Depending on system design and expected system impacts, the controlled interruption of electric supply to customers (load shedding), the planned removal from service of certain generators, and/or the curtailment of contracted firm (non-recallable reserved) electric power transfers may be necessary to maintain the overall security of the interconnected transmission systems.
- e) A number of extreme contingencies that are listed under Category D and judged to be critical by the transmission planning entity(ies) will be selected for evaluation. It is not expected that all possible facility outages under each listed contingency of Category D will be evaluated.
- f) Normal clearing is when the protection system operates as designed and the fault is cleared in the time normally expected with proper functioning of the installed protection systems. Delayed clearing of a fault is due to failure of any protection system component such as a relay, circuit breaker, or current transformer (CT), and not because of an intentional design delay.

Table I. Transmission System Standards – Normal and Emergency Conditions*

g) System assessments may exclude these events where multiple circuit towers are used over short distances (e.g., station entrance, river crossings) in accordance with Regional exemption criteria.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Phase III and Phae IV Planning Standards should not be included in Version 0 standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

When the reliability authorities function is shared with a registered reliability authority and a reliability coordinator, it should not be viewed as "delegating upward" but as an agreement between the reliability authority and the RC on the sharing of certain functions. The RA is ultimately accountable for reliability concerns.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001			Various references to CPM1 and CPM2 should be updated to CPS1 and CPS2. Various references to Control Area should be updated to BA.
002			Level 1 non-compliance should say "...or equal to 95%" Some important info in Supporting Notes should be included in the standard.
005			The last sentence in the Purpose section and the sentence in R4 do not read properly.
008			The requirement for the RA to report to the RRC violation of SOL exceeding 30 minutes does not align with the requirements identified in the standard.
009		R3	Should use the function model name for PSE.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
016			<p>Compliance Monitoring Process:</p> <p>Third paragraph - The RA should "direct" the cancellation of an outage, not "request".</p>
018		R3	<p>Only the RA should be issuing reliability directives.</p>
020		R5	<p>Some Emergency Energy Alerts are issued before coming to the end of the list.</p> <p>R6 should come before R5.</p> <p>The Attachment 1 needs to have all references made to the functional model.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:		Kathleen A. Davis			
Organization:		Tennessee Valley Authority			
Telephone:		423-751-6172			
Email:		kadavis@tva.gov			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: Electric System Operations					
Lead Contact		Mitch Needham		Organization: TVA	
Telephone:		423-751-6013		Email: meneedham@tva.gov	
Member Names	Organization	Segment	Member Names	Organization	Segment
Chuck Feagans	TVA	1			
Edd Forsythe	TVA	1			
Sue Mangum	TVA	1			
Jerry Wynne	TVA	1			
Larry Goins	TVA	1			
Mitch Needham	TVA	1			
Stuart Goza	TVA	1			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As stated, this assumes acceptable improvements are made in response to comments.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

STANDARD 001

- **Measurement M1**
- o **Suggest CPM1, for revision 0, be changed to CPS1**
- o **CPR1 needs to be changed to CPS1**
- o **The definition of “clock-minute average” needs to add the phrase “as well as for the control area’s frequency bias”**

A clock-minute average is the average of the reporting Balancing Authority’s valid measured variable (i.e. for ACE and for frequency error, as well as for the control area’s frequency bias) for each sampling cycle during a given clock-minute.

- o **Suggest CPM1 be changed to CPS1**
- o **Reference is Performance Standard Reference Document C 1.1.1.1**

- **Measurement M2**
- o **Suggest CPM2 be changed to CPS2 to preserve the Policy 1 designations**

- o Reference Policy 1A Requirement 2.2.1 should be Performance Standard Reference Document, 1.2.1
- o Reference Policy 1A Requirement 2.2.2 should be Performance Standard Reference Document, 1.2.2
- o Reference Policy 1A Requirement 2.2.2.1 should be Performance Standard Reference Document, 1.2.2.1
- o Suggest “A Balancing Authority providing or receiving SUPPLEMENTAL REGULATION SERVICE though DYNAMIC TRANSFER shall “ be removed from M2 and included as a requirement (see suggestion to add R5 above).
- Compliance Monitoring Process
 - o The Standard Drafting Team recommends this section be removed from Version 0. If this section remains:
 - Reference to NERC Standard Training Document be changed to NERC Performance Standard Reference Document
 - Suggest CPM1 and CPM2 be changed to CPS1 and CPS2 respectively as previously discussed
- ** CPM1 & CPM2 have not been field tested - wait until testing is done. Keep CPS! & CPS2 until Version 1

STANDARD 002

- o Change Disturbance Control Performance Standard to Disturbance Control Standard
- Requirement R3
 - o Suggest changing Disturbance Control Performance Measure M1 (DCM) to NERC Disturbance Control Standard.
 - o References should be Policy 1B 2 and Policy 1B 2.1
- Requirement R4
 - o Suggest changing DCM to DCS
 - o Add the NERC Resources Subcommittee as an additional approver for adjustment for the default performance criterion
 - o References are Policy 1B 2.2.1 and Policy 1B 2.2.2
- Requirement R5
 - o Suggest changing DCM to DCS
 - o References are Policy 1B 2.3 , Policy 1B 2.3.1 and Policy 1B 2.3.2
- Requirement R6
 - o References are Policy 1B, 3, Policy 1B 3.1 and Policy 1B 3.2
- Measurement M1
 - o For $ACEA < 0$, ACEA should be changed to ACEM for the Ri equation
 - o ACEM should be changed to ACEm when referenced to minimum algebraic value of ACE
 - o ACEm should be changed to ACEM when referenced to maximum algebraic value of ACE
 - o Strike sentence “In the illustration to the right, the horizontal line...”. This is part of an example.
 - o The words “disturbance, i.e. ACEm=ACE15 min “ was omitted from the last sentence (Performance Standard Reference Document C 2.3)
 - o Suggest removing the graph unless an example is going to be added in this measurement for clarification
 - o Reference should be Performance Standard Reference Document C2, C 2.1, and C 2.3

STANDARD 26

R4 seems to require that automatic load shedding be implemented upon under frequency, under frequency rate of change, under voltage, under voltage rate of change or power flow levels have reached agreed upon levels. Current Policy 6, Section C, Requirement 1.2.1 requires only that automatic load shedding be “related” to one or more of these conditions.

**** TVA does not support the introduction of new tools or new policies in version 0.**

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

As a whole, we agree, but there are cases where new policy could be implied based on the wording. (see response in question 2)

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

This type of change should be addressed in Version 1

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

In general, there appear to be a number of coordination or hierarchy of authority confusions relating to the translation of the terms “operating authority” or “control area” into the function model terms Reliability Authority, Balancing Authority and Transmission Operator. In a number of cases, these three terms work well. In others, the specific functions to be performed can not be performed by all three of these entities without risking major coordination problems or violating FERC Order 889. The solution to this is, in general, to establish a hierarchy of control related to these areas and put one entity, generally the Reliability Coordinator, in charge of the required actions. This, however, may vary too much from current policy language and may have to await development of Version 1 standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

There is still considerable confusion over the Functional Model which needs to be better defined. (refer to answer in question 5)

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Agree, EXCEPT for 1F- control of inadvertent needs to remain with NERC

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No suggestions

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The Reliability Coordinator does not exist in the Funcional Model as stated in the last sentence of this question

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

If any of the III.C measurements are included in Version 0, they should be field tested. Industry comments from the field test should be incorporated in the final version before implementation.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

All Phase IV standards/measurements require significant "fixes" and should be considered in Version 1, not Version 0. If any Phase IV measurements are included in Versio 0, they should be field tested. Industry comments from the field test should be incorporated in the final version before full implementation.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
33-40			<p>In comparing Policy 9 to Standards 33 – 40 in Version 0, it was determined that the following requirements of Policy 9 were either omitted from Version 0, or not translated clearly enough for me to make a connection:</p> <p style="padding-left: 40px;">9A Requirements 1.3 & 4 9B Requirement 9C Requirement 1.1, 1.2, & 1.5</p>
			<p>also 9D Requirements 2 & 3 9E Requirements 1.4 & 1.4.1 9F Requirements 1, 2, 3, 4, 4.1, 5, & 6 9J Requirement 1.3</p> <p>maybe these are to be included in NAESB business practices</p>
001			<p>Requirement R3 Suggest changing CPM1 and CPM2 to CPS1 and CPS2 to preserve the Policy 1A designations. I agree that CPM1 and CPM2 may be better choices to communicate measures instead of standard but suggest those changes appear in Revision 1.</p>
002			<p>Requirement R3 Suggest changing Disturbance Control Performance Measure M1 (DCM) to NERC Disturbance Control Standard. References should be Policy 1B 2 and Policy 1B 2.1 Suggest changing DCM to DCS Add the NERC Resources Subcommittee as an additional approver for adjustment for the default performance</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M4	<input type="checkbox"/>	<input type="checkbox"/>
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		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032			The "Effective Date" is listed as February 8, 2004, which is an error, it should be February 8, 2005.
032		R1	Policy 8C Standard 1 is satisfactorily represented by Standard 032 Requirement 1. However, there was a one word change from "both" to "either", that can change the meaning of the statement, depending upon interpretation. In the interest of keeping the continuity between Policy 8C and Standard 32, the wording should be kept consistent and any changes be made through the normal process as part of version 1.
032		M1	Policy 8C Standard 2 exception is satisfactorily represented by Standard 032 Measurement 1.
032		R1	Suggestion to be incorporated into the next version (version 1): The operating position is to be filled by a person holding the appropriate level certification. For Example; a person that is acting as the Reliability Coordinator will need to hold a Reliability Coordinator Operator Certification and a person acting as a Transmission Operator would need to hold a Transmission Operator Certification.
032		R1	Suggestion to be incorporated into the next version (version 1): The Reliability Coordinator Operator Certification qualification is sufficient to cover any position that requires a NERC Certified System Operator. The Balancing, Interchange, and Transmission Operator Certification is sufficient to cover positions that require either a Transmission or Balancing and Interchange Operator Certification.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
036		R1	The requirement that states that the Reliability Authority shall staff with personnel that have a Reliability Coordinator Operator Certification needs to be incorporated into Standard 032 "Operating Personnel Credentials" as opposed to standard 036. The requirements for operating personnel credentials needs to be in the one section that addresses that topic.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization: FRCC					
Telephone:					
Email:					
		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input checked="" type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: FRCC Members					
Lead Contact Patti Metro		Organization: FRCC			
Telephone: (813)289-5644		Email: pmetro@frcc.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Linda Campbell	FRCC	* 2	Tom Washburn	OUC	* 3
Alan Gale	TAL	* 5	Richard Gilbert	LAK	* 3
Joe Krupar	FMPA	* 3	Marty Mennes	FPL	* 1
Roger Wesphal	GRU	* 3	Pedro Modia	FPL	1
Mark Bennett	GRU	* 5	Ron Donahey	TEC	* 3
Garry Baker	JEA	* 3	John Currier	TEC	* 5
Randy Boswell	JEA	* 5			
Ted Hobson	JEA	* 1			
Steve Wallace	SEC	* 4			
Amy Long	LAK	* 1			
Paul Elwing	LAK	* 5			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

NONE

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Because the redlined Operating Policies were not provided with the posting of the Version 0 Standards, the industry wasted time and effort trying to modify reference notations that created confusion in understanding the translation process. In the future, the entire package should be posted at one time to allow for a thorough evaluation with minimum effort. In addition, a detailed mapping for the Operation Manual should be provided. This mapping should include Appendixes, Reference Documents, and Training Guides etc...

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Even though there is redundancy, it is important for the redundancy to be included to allow the industry to see the exact translation from NERC Operating Policies and Planning Standards to Version 0. Otherwise it may be difficult for the industry to track the changes involved with the removal of redundancy, which could result in the industry being uncomfortable in approving Version 0. The redundancies should be eliminated by using the ANSI process with the transition from Version 0 to Version 1.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

We believe that for the translation of existing NERC Operating Policies to Version 0 requirements, the only functional model entities that should be used for Control Areas and Operating Authorities are the Reliability Authority, Balancing Authority and Transmission Operator.

Requirements assigned to other entities need to be made in the transition from Version 0 to Version 1. Since the industry does not have a clear understanding of the all the entities included in the Functional Model, this approach will allow the industry more time to review and debate this issue.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

We believe that for the translation of existing NERC Operating Policies to Version 0 requirements, the only functional model entities that should be used for Control Areas and Operating Authorities are the Reliability Authority, Balancing Authority and Transmission Operator.

Requirements assigned to other entities need to be made in the transition from Version 0 to Version 1. Since the industry does not have a clear understanding of the all the entities included in the Functional Model, this approach will allow the industry more time to review and debate this issue.

For Version 0 the Reliability Authority, Balancing Authority, and Transmission Operator should be expected to have the appropriate mechanisms and of agreements for the other entities included in the Functional Model. The Version 0 Standards could identify these other entities, but the requirements should only apply to the Reliability Authority, Balancing Authority, and Transmission Operator.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

FRCC agrees with philosophy of identifying potential business standards. Since there are reliability concerns involved with the practice of addressing time error correction (1D), the inclusion of this standard as a business practice should be reconsidered. Additional comments provided on STD 004.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

NONE

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

We agree with the approach because the Functional Model is not clear. However, this approach will not rectify the confusion between the Reliability Authority and the Reliability Coordinator. The confusion will be compounded further when entities within a Region, operating with a single Reliability Coordinator choose to register differently (Example: One Control Area registering as an RA, BA, and TOP, and another Control Area registering as a BA and TOP – with the RC registering as an RA in both cases). We really believe the Functional Model needs to be corrected to include the Reliability Coordinator since the reliability of the bulk electric system also relies on the actions of the Reliability Coordinator.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

General Comments about some of the Phase 3 Standards are provided in response to Question 13.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

In general, the standards included in the FRCC list for deletion are; unnecessary, or documentation exercises that would be costly to implement and not provide valuable information, or redundant with existing standard implemented in earlier phases of the Planning Standard process.

Phase 4 has not been field-tested and for the most part is not ready for compliance assessment. Regional input on Phase 4 has not been solicited or used by NERC. We would recommend that most of the Phase 4 compliance templates be removed from Version 0 at this time. If the Phase 4 measures are retained in Version 0, it should be done with the proviso that field-testing and Regional input will be used prior to compliance assessment.

General Comments about some of the Phase 4 Standards are provided in response to Question 13.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
SEE ADDITIONAL COMMENT FORM PROVIDED BY FRCC			SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL DOCUMENT IN RESPONSE TO QUESTION 13.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

SINCE THE COMMENT FORM PROVIDED WAS PASSWORD PROTECTED AND DID NOT ALLOW ADDITIONAL COMMENT SPACE IN THE PROVIDED TABLE, FRCC HAS ATTACHED AN ADDITIONAL WORD DOCUMENT IN RESPONSE TO QUESTION 13.

Throughout the Version 0 Standards the terms, Regions, Regional, Regional Reliability Coordinating Councils, Reliability Coordinating Organizations were used interchangeably. for Consistency, one term should be to identify this type of entity.

It appears that in the translation of existing Policy 5 that 5E was omitted in Version 0.

The translation of Planning Standards and associated Compliance Templates was very accurate making the review for consistency effortless. Because of this, the goal was to answer the specific questions regarding Phase 3 and 4 and provide comments for clarity without the concern of additional requirements being added to the standards. There were existing Planning Standards that “no translation was attempted”. Will these be included in Version 1 or a SAR created for the development of a future standard?

Entities in the Version 0 Standards are identified by either capitalizing the word(s) like BALANCING AUTHORITY, or capitalizing the first letter of the word(s) like Operating Committee. Also in 000-R1 when the word “area” is used with BALANCING AUTHORITY then “AREA” is capitalized and when the word is used alone “Area” only the first letter is capitalized. For consistency, one method should be used.

While BALANCING AUTHORITY is defined in the Functional Model, there are terms that are not identified in the body of the Standard like AREA’S, INTERCONNECTION FREQUENCY ERROR. All terms used in the Version 0 Standards need to be either part of the standard or in a section of approved terms.

The Compliance Monitoring Process portion of each Version 0 standard should be modified from the Compliance Template format to mirror the format that is presently used in the draft NERC Reliability Standards. This need is apparent in many if the standards when the template used for translation indicated an entity responsible for Compliance Monitoring and the new standard do not describe that responsibility.

NOTE: COMMENTER INFORMATION (*) INDICATES A MEMBER OF THE REGISTERED BALLOT BODY

FINAL FRCC COMMENTS 08/09/04

Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R1	<p>The formula included in this requirement is the calculation of CPS1 and should be indicated as such in this requirement.</p> <p>In the Policy 1 redline used for translation to Version 0, “BALANCING AUTHORITY’S ACE” is used. In Version 0, the term “BALANCING AUTHORITY AREA’S ACE” is used. For clarity, the terms in the Version 0 should be consistent with the existing policy.</p>
001		R2	<p>The formula included in this requirement is the calculation of CPS2 and should be indicated as such in this requirement.</p> <p>In the Policy 1 redline used for translation to Version 0, the words “its average ACE” was used. In Version 0, “ its Area’s average ACE” was used. Also the terms BALANCING AUTHORITY AREA(S) were used to replace “balancing area and systems” in the Policy 1 redline used for translation to Version 0, but this change was not made throughout R2. As stated in R1, for clarity, the terms in the Version 0 should be consistent with the existing policy.</p>
001		R3 and R4	<p>The definition for term “OVERLAP REGULATION SERVICE” used in these requirements should be provided in this standard or in a glossary of approved reliability terms.</p>
001		R3	<p>CPM1 and CPM2 are not identified in the Policy used for translation. Should this requirement reference CPS1 and CPS2 or R1 and R2? For consistency, the same terminology must be used throughout the standard.</p>
001		M1	<p>CPR1 is not identified in the Policy or Reference Document used for translation. Should it be CPS1 as indicated in the Compliance Template P1T1?</p> <p>“Epsilon 1” should be changed to the symbol.</p> <p>Recommend the following revision to remove the words “reporting area’s ACE” :</p> <p><i>Normally, sixty (60) clock-minute averages of BALANCING AUTHORITY AREA’S ACE and of the respective Interconnection’s frequency error will be used to compute the respective Hourly Average Compliance parameter.</i></p>

FINAL FRCC COMMENTS 08/09/04

Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		M1 Existing Document References	<p>Policy 1A Requirement 2.1 discusses supplemental regulation not compliance.</p> <p>Should also include – P1T1 and section C 1.1 of the Performance Standards Reference Document</p>
001		M2	<p>CPS2 not consistent with CPR1 in M1</p> <p>We recommend the following be added as an additional requirement instead of included in M2:</p> <p><i>A BALANCING AUTHORITY providing or receiving SUPPLEMENTAL REGULATION SERVICE through DYNAMIC TRANSFER shall continue to be evaluated on the characteristics of its own ACE with the SUPPLEMENTAL REGULATION SERVICE included.</i></p> <p>The definition for term “SUPPLEMENTAL REGULATION SERVICE” used in this measure should be provided in this standard or in a glossary of approved reliability terms.</p>
001		Compliance Monitoring Process	<p>The following comment was provided by the Drafting Team:</p> <p><i>The Drafting Team proposes to remove the compliance monitoring process from the Version 0 standards. Information in the compliance template is shown here for reference.</i></p> <p>What does this mean? Would this be the same for all standards included in Version 0?</p> <p>Since the NERC Performance Standard Training Document will be retired with the adoption of Version 0 Standards, it should not be referenced in Standard 001.</p> <p>See comments for R3, M1, M2 regarding CPS/CPM/CPR</p>
001		Levels of Non Compliance	<p>See comments for R3, M1, M2 regarding CPS/CPM/CPR</p>
002		R1	<p>Do not agree that a BA can assign its obligation to a Reserve Sharing Group.</p> <p>Recommend the following revision:</p> <p><i>A BALANCING AUTHORITY may elect to fulfill its CONTINGENCY RESERVE obligations by participating as a member of a RESERVE SHARING GROUP. In such cases, the RESERVE SHARING GROUP shall have the same responsibilities and obligations as each BALANCING AUTHORITY within it, with respect to monitoring and meeting the requirements of Standard 002.</i></p>

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R1	<p>Do not agree that a BA can assign its obligation to a Reserve Sharing Group.</p> <p>Recommend the following revision: <i>A BALANCING AUTHORITY may elect to fulfill its CONTINGENCY RESERVE obligations by participating as a member of a RESERVE SHARING GROUP. In such cases, the RESERVE SHARING GROUP shall have the same responsibilities and obligations as each BALANCING AUTHORITY within it, with respect to monitoring and meeting the requirements of Standard 002.</i></p>
002		Compliance Monitoring Process	Since the NERC Performance Standard Training Document will be retired with the adoption of Version 0 Standards, it should not be referenced in Standard 002.
002		Full Compliance	Since the NERC Performance Standard Training Document will be retired with the adoption of Version 0 Standards, it should not be referenced in Standard 002.
002		Levels of Non Compliance	<p>Level 1 was translated incorrectly it should be:</p> <p><i>Level 1— Value of APR is less than 100% but greater than or equal to 95%.</i></p> <p>The definition for term “Disturbance Control Performance Adjustment” used in this measure should be provided in this standard or in a glossary of approved reliability terms.</p>
002		Supporting Notes	<p>For clarification, are supporting notes going to be included within the Standards? If so, is compliance with the notes required? We believe supporting notes should be for clarification purposes only and contain no compliance requirements. Current supporting notes contain clarification information as well as compliance requirements - additionally a good faith effort is not a measurable requirement thus needs clarity. If these notes are to remain part of the standard, the notes should be included as actual requirements.</p>
003		R5	<p>For clarity, this requirement should be revised as follows:</p> <p><i>A BALANCING AUTHORITY that is performing Overlap Regulation Service shall increase its Frequency Bias Setting to match the frequency response of the entire area being controlled. A BALANCING AUTHORITY that is performing Supplemental Regulation Service shall not change its Frequency Bias Setting for Supplemental Regulation Service.</i></p>

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
004		Drafting Team Comments	<p>Although the Drafting Team recommends time error correction procedures become NAESB business practice standards, the use of frequency set-points for time error correction is a reliability issue and should be included in the NERC Version 0 Standard.</p> <p>In addition, requirements of this standard should provide the Reliability Authority the authority to intervene in time error correction procedures for reliability reasons.</p>
005		Purpose	<p>It is stated in the purpose that: AGC is used to limit the magnitude of AREA CONTROL ERROR (ACE) variations to the CPS bounds.</p> <p>The term “CPS bounds” continues the inconsistency of terminology as discussed in Standard 001.</p>
005		Applicability	The Generator Operator and Load Serving Intites should not be included in the list of applicable entities.
005		R1	This requirement should be revised to reflect the recommended change in applicability of the standard .
005		R2	The term “Control Performance Measure” continues the inconsistency of terminology as discussed in Standard 001.
005		General Comment	In the Policy 1 redline used for translation to Version 0, it was indicated that Policy 1 sections 4.8.3.3 and 4.8.3.4 were to be in Standard 005-Supporting Notes. There are no Supporting Notes included in this standard.
006		Drafting Team Comments	<p>Although we agree that Inadvertent Interchange payback in-kind is a business practice, section 5.1.2 of existing policy in regards to Unilateral payback should remain a reliability issue and should be included in the NERC Version 0 Standard. If the practices result in unscheduled flows, all parties will comply with Standard 012.</p> <p>In addition, requirements of this standard should provide the Reliability Authority the authority to intervene in issues relating to Inadvertent Interchange if they contribute to or affect reliability issues.</p>
006		R4	The definitions for terms “On-Peak and Off-Peak” are not provided. Is this due to development of the companion NAESB Standard?

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
006		R5 Drafting Team Comments	We agree with the Drafting Team that a separate dispute resolution procedure should not be maintained and that the existing Inadvertent Interchange Dispute Resolution Process and Error Adjustment Procedures either be incorporated in the existing Dispute Resolution Procedures or transferred to NAESB for development.
007		Applicability	Since there are no requirements included in this Standard for the Balancing Authority it should be removed from the list of applicable entities.
007		R2	The translation of R2 from existing policy was modified. It should be revised as follows to reflect the words from existing policy: <i>... cascading outages resulting from credible multiple outages ...</i>
007		R3	The definitions for terms “Interconnected Reliability Operating Limits and System Operating Limits” used in this requirement should be provided in this standard or in a glossary of approved reliability terms.
008		R5 Drafting Team Comment	The Drafting Team stated that R5 should be considered as a compliance monitoring or administrative procedure rather than a standard. We agree, and during the transition from Version 0 Standards to Version 1 Standards these types of changes will be addressed. In addition, these types of administrative issues will need to be consistent with the approved NERC Disclosure Guidelines.
008		Measures	In the translation of existing policy the term Control Area Operator remained in the last sentence of this section. It should be revised as follows: <i>Evidence that the Reliability Authority evaluated actions and provided direction as required to the Balancing Authority or Transmission Operator to return the system to within limits.</i>
008		Compliance Monitoring Process	In the translation of existing policy, the term Reliability Coordinator remained in the last section of the Compliance Monitoring Process. It should be revised as follows: <i>RELIABILITY AUTHORITIES shall report to its Regional Reliability Council any occurrences where an IROL violation extended beyond 30 minutes.</i>
008		Levels of Non Compliance	In the translation of existing policy, the term Reliability Coordinator remained in the last sentence of the Levels of Non-Compliance. It should be revised as follows: <i>The limit violation was reported to the RELIABILITY AUTHORITY who did not provide appropriate direction to the Transmission Operator resulting in an IROL violation in excess of 30 minutes duration.</i>

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
010		R2	<p>Clarification of the following is required: <i>... such as through prearranged reserve sharing agreements or other arrangements...</i></p> <p>Does this mean that reserves will need to be tagged is an entity is part of a reserve sharing group, or, does it mean reserves are tagged if purchased from another member of the reserve sharing group when the purchaser cannot cover their required reserves?</p>
013		Drafting Team Comments - R4	<p>The Drafting Team asked commenters if they agree with the modified structure of requirement R4. We believe it is important that no changes are made to existing policy with the translation to Version 0. Any modified format should be considered in Version 1, but we do not agree with the format provided. The minimum requirement to change a tag should be at least 25 MW in both cases (above and below 100 MW). If the Drafting Team wants better resolution of Dynamic Interchange Schedules, then tagging requirements for changes could be eliminated if the actual dynamic value was provided to the RA then the RA would place the value into the IDC and there is no doubt about dynamic Interchange Schedule actual value.</p>
014		Drafting Team Comments - Standard	<p>Since this standard is one with potential redundancy with other standards, the Drafting Team asked to what extent should the redundancies be eliminated in Version 0. It is important that no changes are made to existing policy with the translation to Version 0. The removal of redundancy should be considered in Version 1.</p>
014		Applicability	<p>In the comments for R1, the Drafting Team asked the industry to consider the following approach: “ ... to have the standard apply only to BAs and TOs and assume that Generator Operator and other functions are obligated through service agreements or connection requirements ...” We agree with this approach and the applicable entities be modified to reflect this proposed change.</p>
014		R1	<p>This requirement should be revised to reflect the applicability of the standard to BAs and TOs.</p> <p>The following was not included in exiting policy and should be removed from the Version 0 translation:</p> <p><i>...and other affected BALANCING AUTHORITIES and TRANSMISSION OPERATORS...</i></p>

FINAL FRCC COMMENTS 08/09/04

Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014		Drafting Team Comments - R4	<p>The Drafting Team asked the following:</p> <p><i>Is load forecasting required for reliability or not, if not, why is this information required?</i></p> <p>We believe that load forecasting is required to determine SOLs or IROLs. If load is known, the Operations Planning process will identify actions required to eliminate or mitigate potential reliability issues.</p>
015		R1	Existing Document References should include Compliance Template P4T2
015		Compliance Monitoring Process Drafting Team Comments	<p>The existing Compliance template uses the terminology “Monitoring Process” not “Exception Reporting”.</p> <p>The following comment was provided by the Drafting Team:</p> <p><i>Proposed to remove the compliance monitoring section from the Version 0 standards.</i></p> <p>What does this mean? Would this be the same for all standards included in Version 0?</p>
015		Levels of Non Compliance	The applicable entity is the Reliability Authority not the Reliability Coordinator.
016		Applicability	<p>Refer to the approach presented in Standard 014 - “... to have the standard apply only to BAs and TOs and assume that Generator Operator and other functions are obligated through service agreements or connection requirements ...”</p> <p>With this approach, the applicable entities should be modified.</p>
016		R1	<p>This requirement should be revised to reflect the applicability of the standard to BAs and TOs.</p> <p>In addition, there was an incorrect translation from Compliance Template P4T4. R1 should be revised as follows:</p> <p><i>... that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation, to their RELIABILITY AUTHORITY, AND to neighboring BALANCING AUTHORITIES and TRANSMISSION OPERATORS...</i></p>
017		Applicability	<p>Refer to the approach presented in Standard 014 - “... to have the standard apply only to BAs and TOs and assume that Generator Operator and other functions are obligated through service agreements or connection requirements ...”</p> <p>With this approach, the applicable entities should be modified.</p>
017		R1-R5	These requirements should be revised to reflect the applicability of the standard to BAs and TOs.

FINAL FRCC COMMENTS 08/09/04

Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
018		Applicability	Agree with the approach presented in this standard and Standard 014 - "... to have the standard apply only to BAs and TOs and assume that Generator Operator and other functions are obligated through service agreements or connection requirements ..." With this approach, the applicable entities should be modified.
018		General Comments – Missing requirements from existing policy	It appears that in the translation from the existing policy to Version 0, Policy 5A 1, 3, 7, 8, 9, and 10 were not included and although redundant should be added to this standard as additional requirements.
018		R3	With the Service Agreement approach, the second paragraph in requirement should be removed and incorporated as part of the agreement.
018		R3 and R6	These requirements should be revised to reflect the applicability of the standard to BAs and TOs.
018		R5	With the Service Agreement approach, the second paragraph in requirement should be removed and incorporated as part of the agreement. In addition, this paragraph was not included in the existing policy used for the Version 0 translation and should be removed.

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
018		6	STEVE WALLACE TO PROVIDE NEW WORDS FOR THIS REQUIREMENT
019		Applicability	The standard requirements should apply to entities that impact the reliability of the bulk electric system, therefore, the Version 0 standards should impose the requirements on the entities that are designated “Reliability Entities” which are the Reliability Authority, Balancing Authority, and Transmission Operator. With this philosophy, Generator Operator should be removed from the applicable entities list and requirements of this standard revised accordingly.
019		R1	Reliability Authority should be included in this requirement.
019		General Comments – Missing requirements from existing policy	It appears that in the translation from the existing policy to Version 0, Policy 5b 2.1, 2.1.1, 2.1.2, 2.1.3, and 2.1.4 were not included and although redundant with other policies should be added to this standard as additional requirements. The requirements in this standard are incorrectly numbered. (R3 missing)
020		Purpose	The Drafting Team believes this standard is one with potential redundancy with an opportunity for consolidation. Although we agree, as stated earlier, it is important that no changes are made to existing policy with the translation to Version 0. The removal of redundancy should be considered in Version 1.
020		R2	In the translation of existing policy, the term Reliability Coordinator remained in this requirement. It should be replaced with Reliability Authority .

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020		R3-R5	The Existing Document References should be included to provide clarity of translation.
020		R3	<p>The following excerpt from Standard 020 was from the existing policy introduction:</p> <p><i>If the BALANCING AUTHORITY cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:</i></p> <ul style="list-style-type: none"> • <i>Requesting assistance from other BALANCING AUTHORITIES;</i> • <i>Declaring an Energy Emergency through its RELIABILITY AUTHORITY; and</i> • <i>Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.</i> <p>With this now a requirement, it is too broad and appears to apply to more than emergency situations. This requirement should be revised to clarify applicability only during emergencies.</p>
020		R5	The last bullet references Attachment 5C. With the Version 0 translation, this should be Attachment 1 to Standard 020.
020		R6	It appears that the Drafting Team consolidated existing Policy 9 requirements with the translation of existing Policy 5 in this requirement. As stated earlier, it is important that no changes are made to existing policy with the translation to Version 0. The removal of redundancy should be considered in Version 1, therefore this requirement should be moved to the Version 0 Standards related to existing Policy 9.
021		R1-R4	The Existing Document References should be included to provide clarity of translation.
022		R1-R5	The Existing Document References should be included to provide clarity of translation.
023		Applicability	The standard requirements should apply to entities that impact the reliability of the bulk electric system, therefore, the Version 0 standards should impose the requirements on the entities that are designated "Reliability Entities" which are the Reliability Authority, Balancing Authority, and Transmission Operator. With this philosophy, Generator Operator should be removed from the applicable entities list and requirements of this standard revised accordingly..

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
023		R1-R3	The Existing Document References should be included to provide clarity of translation.
024		Applicability	The standard requirements should apply to entities that impact the reliability of the bulk electric system, therefore, the Version 0 standards should impose the requirements on the entities that are designated “Reliability Entities” which are the Reliability Authority, Balancing Authority, and Transmission Operator. With this philosophy, Generator Operator and Load Serving Entity should be removed from the applicable entities list and requirements of this standard revised accordingly. Transmission Service Providers must remain because of role in Operations Planning.
024		R3-R5, R12	The reference to confidentiality agreements was a change for the existing policy used for the translation to Version 0. If some Regional Reliability Councils cannot implement this standard without a reference to confidentiality agreements, a Regional difference should be submitted NERC.
024		R9	This requirement was modified from the existing policy used for translation to Version 0. The existing policy stated that the applicable entity would “plan to meet” the associated requirement. During the conversion process. “meet” was changed to “respect”. This modification changes the intent of the planning for voltage/reactive limits. The following should be considered as an alternative: Each RELIABILITY AUTHORITY, BALANCING AUTHORITY, and TRANSMISSION OPERATOR shall plan to consider voltage and/or reactive limits, including the deliverability/capability for any single contingency.
024		R10	The Drafting Team questioned the meaning of R10 and whether it was necessary or enforceable. We agree and suggest removing the second sentence of this requirement.
024		R11	This requirement was modified from the existing policy used for translation to Version 0. The existing policy stated that the applicable entity would “plan to meet” the associated requirement. During the conversion process. “meet” was changed to “respect”. The following should be considered as an alternative: Each RELIABILITY AUTHORITY, BALANCING AUTHORITY, and TRANSMISSION OPERATOR shall plan to remain within established System Operating Limits (SOLs).
024		R14	There was an incorrect translation from existing Policy 6A 5. R14 should be revised as follows: <i>... shall perform generating real AND reactive capability verification that shall include...</i>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		Purpose	The reference to “ with NERC Operating Policies” should be removed.
025		R1	The Existing Document References should be included to provide clarity of translation.
025		R4 – R5	We suggest combining the two requirements and reword for clarity.
025		Drafting Team Comments - R5	The Drafting Team asked if the list of “must” statements from Compliance Template P6T1 should be included. We think these elements should be included, however the list attached is from the existing Guide not Compliance Template P6T1. Only the elements from the template should be included.
026		Purpose Drafting Team Comments	The purpose should be more general with the specifics addressed in R1. The Drafting Team asked if the implementation requirements should be moved to other standards focused on emergency operations. As stated earlier, it is important that no changes are made to existing policy with the translation to Version 0. This modification should be considered in Version 1.
026		Drafting Team Comments - R1	The Drafting Team asked if this requirement was redundant with the purpose statement. As we stated above, the purpose should be more general and R1 the specific requirement.
027		R1	The Existing Document References should be included to provide clarity of translation.
027		R2	The Existing Document References include the Compliance Template P6T2.
027		Drafting Team Comments - R4	The Drafting Team believed the restoration plan should include as a priority, restoring the integrity of the Interconnection. As stated earlier, it is important that no changes are made to existing policy with the translation to Version 0. This modification should be considered in Version 1.
027		R9	Recommend the following revision for clarity: <i>The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY shall ensure the availability and location of black start capability within its respective AREA to meet the needs of the restoration plan.</i>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		Existing Document References	The Compliance Template for translation is P6T3 not P6T2. Because of this error, there are considerable changes required to correct this standard to achieve an accurate translation.
028		Purpose	Recommend the following revision for clarity: <i>Each RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY shall have a plan to continue reliability operations in the event its control center becomes inoperable.</i>
028		R1	The following is an accurate translation of Compliance Template P6T3 provided as a recommended revision for clarity: <i>The contingency plan must meet the following requirements with interim provisions included if it is expected to take in excess of one hour to implement the loss of Primary Control Facility contingency plan:</i> <ol style="list-style-type: none"> 1. <i>The contingency plan shall not rely on data or voice communication from the primary control facility to be viable.</i> 2. <i>The plan shall include procedures and responsibilities for providing basic tie line control and procedures and responsibilities for maintaining the status of all inter area schedules such that there is an hourly accounting of all schedules.</i> 3. <i>The contingency plan must address monitoring and control of critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events. The plan shall list the critical facilities.</i> 4. <i>The plan shall include procedures and responsibilities for maintaining basic voice communication capabilities with other RELIABILITY AUTHORITIES, TRANSMISSION OPERATORS, and BALANCING AUTHORITIES.</i> 5. <i>The plan shall include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.</i> 6. <i>The plan shall include procedures and responsibilities for providing annual training to ensure that Shift Operating personnel are able to implement the contingency plans.</i> 7. <i>The plan shall be reviewed and updated annually.</i>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		Compliance Monitoring Process	<p>The following is an accurate translation of Compliance Template P6T3 provided as a recommended revision for clarity:</p> <p>Periodic Review <i>Review and evaluate the loss of Primary Control Facility contingency plan as part of the three-year on-site audit process. The audit must include a demonstration of the plan by the RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY.</i></p> <p>Self-Certification <i>RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY must annually, self-certify to the Regional Reliability Council that Requirements 5, 6 and 7 have been done, that is, the Plan has been tested, the Shift Operators have been trained as planned, and the Plan has been reviewed.</i></p> <p>Reset Period: <i>One calendar year.</i></p> <p>Data Retention: <i>The contingency plan for loss of primary control facility must be available for review at all times.</i></p>
028		Levels of Non Compliance	<p>The following is an accurate translation of Compliance Template P6T3 provided as a recommended revision for clarity:</p> <p><i>Level 1 — N/A</i></p> <p><i>Level 2 — A contingency plan has been implemented and tested, but has not been reviewed in the past year, or the contingency plan has not been tested in the past year or there are no records of Shift Operating personnel training.</i></p> <p><i>Level 3 — A contingency plan has been implemented, but does not include all of the elements contained in Requirements 1–4.</i></p> <p><i>Level 4 — A contingency plan has not been developed, implemented, and tested.</i></p>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
030		Measures	<p>M1 – Bullet 2 – Reference to NERC Operating Policies should be replaced with NERC Reliability Standards</p> <p>In addition, Requirement 4 from the existing Compliance Template P8T1 was omitted. As stated earlier, it is important that no changes are made to existing policy with the translation to Version 0. This modification should be considered in Version 1.</p> <p>The following is provided as a recommended revision for clarity:</p> <ol style="list-style-type: none"> 1. <i>A written current job description exists which states in clear and unambiguous language the responsibilities and authorities of each operating position of a RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, AND BALANCING AUTHORITY. The position description identifies personnel subject to the authority of the RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, AND BALANCING AUTHORITY.</i> 2. <i>Written current job description states operating personnel are responsible for complying with the NERC Operating Policies.</i> 3. <i>Written current job description is readily accessible in the control room environment to all operating personnel.</i> 4. <i>Written operating procedures state that during normal operating conditions, each operating position of a RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, AND BALANCING AUTHORITY has the authority to take or direct timely and appropriate real-time actions without obtaining approval from higher level personnel within each RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, AND BALANCING AUTHORITY.</i> 5. <i>Written operating procedures state that during emergency conditions operating personnel have the authority to take or direct timely and appropriate real-time actions, up to and including shedding of firm load to prevent or alleviate System Operating Limit violations. These actions are performed without obtaining approval from higher-level personnel within the RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, or BALANCING AUTHORITY.</i>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
030		Compliance Monitoring Process	<p>With the addition of the omitted requirement from the existing Compliance Template P8T1 used for translation the following revision is required:</p> <p><i>Self-certification: The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY shall annually complete a self-certification form developed by the RRC based on requirements 1–5 in the Measure M1.</i></p>
030		Levels of Non Compliance	<p>With the addition of the omitted requirement from the existing Compliance Template P8T1 used for translation the following revisions are required:</p> <p><i>Level 1 — The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, or BALANCING AUTHORITY has written documentation that includes four of the five items in M1.</i></p> <p><i>Level 2 — The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, or BALANCING AUTHORITY has written documentation that includes three of the five items in M1.</i></p> <p><i>Level 3 — The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, or BALANCING AUTHORITY has written documentation that includes two of the five items in M1.</i></p> <p><i>Level 4 — The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, or BALANCING AUTHORITY has written documentation that includes none of the items in M1, or the interview verification items 1 and 2 do not support the authority of each operating position within the RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY.</i></p>
031		General Comments	<p>The Existing Document References should be included to provide clarity of translation.</p> <p>Review of this standard could not be completed because portions of this standard were not included in the Version 0 packet: Attachment 1, page 2 etc.</p>
032		Existing Document References	Should include Compliance Template P8T2.

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
033		Title	References Reliability Coordination, but should reference, Reliability Authority - Responsibilities, Authorities, and agreements.
033		Applicability	Because there is information that must be provided to the RELIABILITY AUTHORITY for other entities, the TRANSMISSION OPERATOR and BALANCING AUTHORITY should be included in the applicable entities list. No references should be made to entities other than the RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, or BALANCING AUTHORITY. The service agreement approach as stated in other standards for defining obligations should be utilized and the requirements modified to reflect this proposed change.
033		General Comment	If there is a conflict between a NAESB Business Standard and a NERC Reliability Standard, the NERC Reliability Standard should always be followed.
034		Title	References Reliability Coordination, but should reference, Reliability Authority - Facilities
034		Applicability	Because there is information that must be provided to the RELIABILITY AUTHORITY for other entities, the TRANSMISSION OPERATOR and BALANCING AUTHORITY should be included in the applicable entities list.
034		R-3	A provision should be added to this requirement that the data be provided/exchanged "AS REQUESTED".

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
035		Title	References Reliability Coordination, but should reference, Reliability Authority - Wide Area View
036		Title	References Reliability Coordination, but should reference, Reliability Authority - Staffing
037		Title	References Reliability Coordination, but should reference, Reliability Authority - Operations Planning
037		Applicability	Because there is information that must be provided to the RELIABILITY AUTHORITY for other entities, the TRANSMISSION OPERATOR , TRANSMISSION SERVICE PROVIDER, and BALANCING AUTHORITY should be included in the applicable entities list. No references should be made to entities other than the RELIABILITY AUTHORITY, TRANSMISSION OPERATOR , TRANSMISSION SERVICE PROVIDER, or BALANCING AUTHORITY. The service agreement approach as stated in other standards for defining obligations should be utilized and the requirements modified to reflect this proposed change.
037		R2	The Existing Document References should be included to provide clarity of translation.
037		R4	The Existing Document References should be included to provide clarity of translation.
037		Compliance Monitoring Process	Self- Certification references Compliance Assessment Notes which where included in the Compliance Template P9T1 used for translation. The Drafting Team should revise this portion of the standard to reflect the requirements that are to be measured for compliance.
037		Levels of Non Compliance	The Levels of Non Compliance reference requirements included in the Compliance Assessment Notes which where included in the Compliance Template P9T1 used for translation. The Drafting Team should revise this portion of the standard to reflect the requirements that are to be measured for compliance.
037		Levels of Non Compliance	The Levels of Non Compliance reference requirements included in the Compliance Assessment Notes which where included in the Compliance Template P9T1 used for translation. The Drafting Team should revise this portion of the standard to reflect the requirements that are to be measured for compliance.
037		General Comments	R7 and R8 are not included in this standard. Is RAIS the same as the existing RCIS or SCIS?

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
038		Title	References Reliability Coordination, but should reference, Reliability Authority - Current Operations
038		Applicability	Any references to GENERATION OPERATORS, GENERATOR OPERATORS, LOAD-SERVING ENTITIES, and PURCHASING-SELLING ENTITIES should be removed from the requirements of this standard. The service agreement approach as stated in other standards for defining obligations should be utilized and the requirements modified to reflect this proposed change.
038		R15	<p>Recommend the following revision to properly reflect applicable entities:</p> <p><i>The RELIABILITY AUTHORITY shall ensure that all BALANCING AUTHORITIES, AND TRANSMISSION OPERATORS operate to prevent the likelihood that a disturbance, action, or non-action in its RELIABILITY AUTHORITY AREA will result in a SOL or IROL violation in another area of the INTERCONNECTION. In instances where there is a difference in derived limits, the RELIABILITY AUTHORITY and its BALANCING AUTHORITIES, AND TRANSMISSION OPERATORS shall always operate the BULK ELECTRIC SYSTEM to the most limiting parameter.</i></p>
038		Drafting Team Comments - R17	The Drafting team stated that this requirement was identical to one in Standard 029 and should be deleted . It is important that no changes are made to existing policy with the translation to Version 0. The removal of redundancy should be considered in Version 1.
039		Title	References Reliability Coordination, but should reference, Reliability Authority - Transmission Loading Relief
039		Purpose	<p>The existing policy used for translation to Version 0 was modified. It is important that no changes are made to existing policy with the translation to Version 0. This modification should be considered in Version 1.</p> <p>Recommend the following revision to properly reflect existing policy:</p> <p><i>... process it uses, the RELIABILITY AUTHORITY SHALL direct its BALANCING AUTHORITIES and TRANSMISSION OPERATORS to return the transmission system ...</i></p>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
039		Levels of Non Compliance	<p>Need introduction added that states the following:</p> <p>To achieve 100% Compliance the RELIABILITY AUTHORITY implemented relief procedures in accordance with the requirements.</p> <p>The remainder of this section was the existing Compliance Template P9T2 Compliance Assessment notes. These should be added as additional requirements to this standard. With this addition, it is important to remove any references to existing NERC Policies and Appendices since these will be retired with the adoption of Version 0 Standards.</p> <p>No levels of Non Compliance were included. When this information is added, the Compliance Template P9T2 should be utilized for the translation.</p>
040		Title	References Reliability Coordination, but should reference, Reliability Authority - System Restoration
051	Section 1	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...
051	Section 1	R1-2	<p>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.</p> <p>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”.</p>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	Section 1 Measures	M1-1 and M1-2	<p>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.</p> <p>As indicated in comments for R1-2, since the Planning Authority is ultimately the responsible entity, evidence for assessments and the Planning Authority, not the Transmission Planner, should provide corrective plans.</p>
051	Section 2	R2-2	<p>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.</p> <p>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”.</p>
051	Section 2 Measures	M2-1 and M2-2	<p>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.</p> <p>As indicated in comments for R2-2, since the Planning Authority is ultimately the responsible entity, evidence for assessments and the Planning Authority, not the Transmission Planner, should provide corrective plans.</p>
051	Section 2	R3-2	<p>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.</p> <p>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”.</p>
051	Section 3 Measures	M3-1 and M3-2	<p>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.</p> <p>As indicated in comments for R3-2, since the Planning Authority is ultimately the responsible entity, evidence for assessments and the Planning Authority, not the Transmission Planner, should provide corrective plans.</p>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	Section 4 Measures	M4-1 and M4-2	<p>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. In addition, error in referencing Section 3 requirements and measures in Section 4.</p> <p>Since the Planning Authority is ultimately the responsible entity, evidence for assessments and the Planning Authority, not the Transmission Planner, should provide corrective plans.</p>
052		Purpose	<p>Since the NERC Planning Standards will be retired with the adoption of Version 0 Standards, it should not be referenced in Standard 052.</p>
052	Section 1-2 Measures	M1-1 and M2-1	<p>These measures state that the Regional Reliability Council “shall provide evidence”, but there is no indication of which entities will receive the evidence.</p>
053		Purpose	<p>The purpose references entities “ responsible for the reliability of the interconnected transmission systems”; this should be revised to address specific Functional Model entities.</p>
053	Section1	R1-1	<p>This requirement should reference “NERC Reliability Standards” to eliminate any confusion with the existing standards and policies.</p>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
053	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.
053	Section 2	R2-1	<p>This requirement states that the applicable entities will “coordinate and cooperate” , more clarity should be included in this requirement as to which entities.</p> <p>#2 - This requirement should reference “NERC Reliability Standards” not “NERC Planning Standards”</p> <p>#4 – Recommend the following revision for clarity:</p> <p><i>Evidence that the assessment included steady-state, short-circuit, and dynamics studies as necessary to evaluate system performance in accordance with Reliability Standard 051.</i></p>
053	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.
055	Section 5	Applicability	<p>Recommended revision for clarity:</p> <p>NERC Interconnections: Eastern, ERCOT, Western, and associated Regional Reliability Councils</p>
055	Section 6	Applicability	<p>Recommended revision for clarity:</p> <p>NERC Interconnections: Eastern, ERCOT, Western, and associated Regional Reliability Councils</p>

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
055	Section 6	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.
057		Applicability	Applicability for Section 5 was omitted.
058	Section 6	R6-1	Incorrect reference of Standard II.A.M5. Needs to be updated to new Standard number
059	Section 2 Measures	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.
059	Section 5 Measures	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.
059	Section 6 Measures	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.
060	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.

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061		Applicability	Should reference the Sections not the existing Planning Standards used for translation.
061	Section 1	R1-2	This requirement states that data will be available on request, but there is no indication of to whom.
061	Section 1 Measures	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.
061	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.
061	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.

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	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.
061	Section 4	Levels of Non Compliance	Any references to “entities required by Region” should be revised to address specific Functional Model entities.
061	Section 5	Levels of Non Compliance	Should be revised to reference requirements associated with Section 5 not items (a) and (b).
061	Section 7 Measures	M7-1	Reference to System Operators and Security Center Coordinators should be should be revised to address specific Functional Model entities.
061	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.
064		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.
065	Section 6	Levels of Non Compliance	Incorrect reference of Requirement IIIC.S2.Section C.R1. Needs to be updated to new Standard number
065	Section 9	Measures General Comment	How does this relate to the five-year test schedule of Standard 59? Is this new information?
065	Section 11	R11-1	Incorrect reference of Requirement III.C.S6.Section A.R1. Needs to be updated to new Standard number

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	Section 12 Measures	M12-1 & M12-2	<p>Specific test requirements should be included in this standard that enumerates protection systems to be testes 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>
066		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.
068		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.
069		Effective Dates	The dates for approval of the existing standards appear to be incorrect.
072		Purpose	Missing the following from the Purpose ... “ reported to the appropriate Regional Reliability Council. ”
072	Section 1	R1-1	Should capitalize “Transmission Owner”

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Question 13 – Version 0 Comment Form Part 2 – Questionnaire

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

FirstEnergy is supportive of this endeavor and will participate to the extent possible to expedite the translation and incorporations of the NERC functional model into the existing standards and identify those business practices that may be migrated to NAESB. Two problem areas need to be addressed. First, is in the area of the application of the planning standards phase 3 and 4. Phase 3 standards remain untested but not revised, and phase 4 standards are still untested. Consideration needs to be given on how measures and compliance will be developed. Planning standards should include some flexibility during the transition from Version 0 to Version 1. Second, the current process being applied to transition and translate current policies into a Version 0 document seems to leave out a critical step. Since these policies are going through an extensive review during this process, many critical sections, definitions, applications, and rules are being identified that may no longer apply, need additional clarification, or may need consolidation. There needs to be a way to identify, categorize, document, and track those items that remain inconsistent, undefined, and non-applicable so that they can be handed to the various teams that have already been established to develop version 1. Even though this is not part of the original charge of the drafting team, the identification of these areas by the Version 0 team should not be lost.

The application of a transition process from version 0 to version 1 needs to be clear and concise. NERC and the industry needs to develop a transition process that can be applied to those entities that are currently not under any liability protocol, such as generator operators, but are named as liable entities under the new definitions of the functional model. It must also be made clear that version 0 standards do not impose any new requirements that are not currently in NERC policy. New measures and/or compliance cannot accompany the 'transition' of standards to version 0.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

We believe that there are no ‘show stoppers’ in the current process that would prevent the continuing development of Version 0.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

As a whole, Version 0 is a reasonable translation of NERC reliability rules. However, the comments provided later in this document should be addresses and given due consideration. Standards need to line up better with the functional model. This will be especially critical when entities register their roles for carrying out the criteria of the functional model.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

As stated in our response to question 1, one of the critical areas that is missing from the Version 0 process is that of categorizing, tracking, defining, and documenting logical discrepancies in the current standards. If there is a way to eliminate redundant portions of the standards that do not change the obligations of the current standards, then this should be done. Caution must be exercised during this process because any modification of current policies would jeopardize the approval of the translation process. Since no modification can be made to existing policy, inconsistencies found in current policy needs to be tracked and handed of the various version 1 development teams.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

FirstEnergy is supportive of the functional model and as such, agrees with the designations. That being said, there continues to be significant differences between certain areas of the functional model designation. These areas, such as the Reliability Authority and Balancing Authority, still need to be clarified. Applicability to power pools, ISO's, and stand alone entities pose problems to the designation of functions that will apply to these diverse entities. We understand that this continues to be a work in progress, but before any registration and certification can take place, these issues need to be resolved.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Reference to all functions of the functional model should be incorporated into NERC standards where applicable. There are responsibilities of Generator Operators, Distribution Providers, and Load Serving Entities (among others) that appropriately designate and mandate that they be a part of the reliability process. Generator Operators have requirements such as reactive power,

Distribution Providers and Load Serving Entities have responsibilities for load shedding procedures, so reference to these functions need to be incorporated into NERC standards.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The drafting team's approach is appropriate.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Current NERC policy is embedded with business practice protocol, but a separation of these requirements is essential to achieve the goal of producing a document that addresses reliability. As an example, consideration should be given to Policy 9, Appendix 9C1 – Transmission Loading Relief Procedures. Current, TLR is a hybrid of both reliability and business practices. The TLR process, as currently implemented, incorporates business practice rules. Steps 2 through 5 should be reviewed for possible migration to NEASB. Caution needs to be exercised in defining the cross-functional aspects of implementing business practices that can impact reliability. The development of shadow business practices is a step that can help in the transition of these responsibilities.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

As stated in our response to question 5, there remains issues with certain functions of the functional model, of which the Reliability Authority is one. If there is a delegation of tasks, in any direction, it must be clearly understood where the ultimate responsibility and accountability resides. Responsibility and accountability must remain with that entity that is responsible for that requirement. The delegating entity must insure that who they are delegating a task to is competent to carryout the task. Contracts, or agreements of some sort, need to be executed that delineates all responsibilities. The process for the delegation of functional tasks must be in line with the complete understanding of the responsibility of the tasks. It must also be clearly understood who will be the validator of the assigned tasks, such as RRO's. NERC must make it clear to the industry and to regulatory entities that this is a transitional process starting from February 1, 2005 and extending through the adoption of the NERC Version 1 standards. This is not going to be a turnkey operation.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Compliance with yet untested Phase 3 and 4 Planning standards should include some flexibility and forgiveness to facilitate retuning of the standards as they transition from Version 0 to Version 1. Alternatively these untested standards should be eliminated from Version 0.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

See comments under Question 11.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		R1	The drawing needs to be updated to reflect IROL and SOL rather than Operating Security Limit
007		R2 - R5	These standards need an extensive re-write in version 1 to enhance clarity and the understanding of what IROL's and SOL's are and how to apply them. More detail is definitely needed in this area.
008		R1	Refers to Reliability Coordinator rather than Reliability Authority
008		R10	With the addition of the various functional entities, this requirement should read The Transmission Operator, Balancing Authority, and Distribution Operator shall coordinate corrective action including load reduction necessary to prevent voltage collapse when reactive resources are insufficient. (The BA needs to be consulted and informed any time a significant load reduction is required in order to manage the generation resources.)
010		R2 - R3	References Operating Security Limit violation, should be SOL and IROL.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014 - 017			Standards need to line up better with functional model. These are Transmission planning standards for the most part and should be included in the Planning Standards not Operating Standards. Also, the guidelines should be considered for additions as standards as they reflect good business practices.
015		R1 and R3	These two requirements refer to Appendix 4B (also referred to as Appedix A in the revised document). These items should be listed in the requirements rather than cause the reader to refer to an appendix.
018		R3	Item 2.2.1 should be added to standard 008 R10.
018			Page P5-2 item 3 refers to a time limit of 30 minutes, this is adequate for IROL and SOL but should reflect 15 minutes for DCS issues.
019		R2	All groups active in the industry should be required to report sabotage incidents and security breaches.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
22		R1 - R3	The answer to the question of, "Can we replace reference to RA, BA, and TO by the use of responsible entity?" is NO. The entities and their responsibilities need to be clearly spelled out throughout this document to be effective.
022-023			Still refers to System Operators. This classification is not in the functional model.
024-025			These standards appear to assume that Balancing Authority is equivalent to Control Area. Also, the term NERC operating policies needs changed to NERC Standards.
024		R7	Need to explicitly and precisely define what N-1 contingency means.
025		R2	This requirement is inconsistent with the recently published NERC Continuing Education Hours White paper.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
042-043			Training requirements should apply to all industry entities.
026		R7	Add UVLS to this requirement.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The change from policies to standards results in a considerable amount of information being removed from the standards. This information needs to be retained somewhere for training purposes. We would support the development of a supporting document that would act as a placeholder for the current guides in NERC policy

Acronyms should not be used unless they have been completely identified at least once previously in the policy. As an example, IROL should not be used until it has been defined as Interconnection Reliability Operating Limit (IROL) at least once in each standard.

A number of organizations are closely watching the development of Version 0 Standards. Any attempt to eliminate current measures may appear as an attempt to reduce reliability by the Industry. Correcting of any flaws in the Standards should be achieved in the development of Version 1 Standards either through the normal or emergency SAR process. The Version 0 drafting team should be charges with documenting and assembling areas needing enhancements to reduce vagueness and increase clarity for the version 1 effort.

Throughout many of the standards, the term NERC operating policies need to be changed to NERC standards.

Guides that are stated in Policy 6, P6-7 and 8, are good practices and should be incorporated into standards – Version 1 comment

Guides in Policy 6, P10, should be added to Planning Standards

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

While most of the translation is acceptable and appropriate, there are a number of "standards" that have not gone through the rigors of submittal and commentary such as 059 which is the generator testing "standard" which was an original Phase 4 document.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

See question 1 above.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Agreed with the exceptions noted.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

We believe the best approach is to attain an approved Version 0 standards translation that provides the maximum opportunity to maintain a consistent mapping from the existing documents to the new document.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Abstain from commentary since we are representing a planning perspective and are thus reviewing only the planning standards.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Abstain for reasons stated in Question 6.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

None noted in the planning standards.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	4	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 application requirements for this inappropriate.
051		Table 1 - Note a)	Please clarify that applicable 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.
Various			Levels of Non-Compliance - there is need of a higher level review consistency of the levels of non-compliance for the measures that involve multiple items that must be complied with. In some instances, for example, the levels are identified as: L1 - one of eight requirements not met; L2 - two of eight, etc.; In other instances, we have L1 - N/A; L2 - Less than 2 of 8 requirements not met; L3 - N/A; L4 - More than 2 of 8 not met. Overall consistency desired.
057	3	R3-1	Include Item 7. Point of Contact for delivery of required data.
061			Standard Applicability - the New Language needs to reference the R1-1 format and not the old I.L.D.M1, etc. format.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	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.
067	2		Levels of Non-Compliance - The graduated levels of UFLS are too small. Suggest: Level 1 - ok as presented. Level 2 - N/A Level 3 - Less than 100% of amount of needed load shedding capability is provided. Level 4 - Less than 90% of amount of needed load shedding capability is provided.
072			The entire format is inconsistent with the format established for standards 051-071
064	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

These new NERC Standards are designed to encompass all market participants. It is imperative that all market participants (including Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing Selling Entities) register in their applicable areas and provide the needed information as requested from the Reliability Authority, Balancing Authority, or Transmission Operator. NERC must ensure that full registration of all parties is required and accomplished.

Commenting on the Operating Standards, in general, the standards appear to be a fair translation from the operating policies into the proposed standards incorporating the functional entities. Overall, there appear to be a significant number of requirements which do not have accompanying compliance measures and therefore are not enforceable. Some specific comments on individual standards need to be addressed prior to approval.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

None

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Some seemingly redundant statements in the draft standards, when taken into context, offer conflicting points of view or can be misinterpreted and lead to confusion on implementing the overall purpose of the standards (e.g. Energy Emergency Alerts and Emergency Load Shedding discussed in the Policy 5, 6, and 9 standards)

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The functional model creates error precursors with respect to communications and timely actions required in power system emergency scenarios and thus we cannot support implementation of the functional model in part or in whole.

There are some aspects of the standards that tend to dilute authority among these entities leading to "who has overarching authority?" with respect to directing actions for preserving reliability. Segregating reliability functions via the functional model lends itself to miscommunications and/or lack of communications and questions of authority as revealed in the August 14 blackout.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Need to make sure hierarchy among these entities is established and referenced in standards. Also, with respect to service agreements outside of the standards, our stance is that if it's warranted standard practice for maintaining reliability, then it should be included in the Reliability Standards.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Inadvertent payback is a reliability issue with respect to bounds placed on when and how much inadvertent can be paid back via a unilateral process. Also, tag approval should remain a reliability standard.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Within this question it is stated that in certain regions control areas will need to be deemed the Reliability Authority. If you must implement the functional model in part or in whole, we adamantly support this position. Certain state regulatory statutes will require such designation. The ability of a utility to be designated as the Reliability Authority which would then have the capability to support an "upward" delegation of certain tasks to a third party that could provide a wide-area view is an essential component in the acceptance and implementation of the NERC functional model.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

See comments on Planning Standards submitted by Progress Energy Transmission Planning

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

See comments on Planning Standards submitted by Progress Energy Transmission Planning

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
02		R6	As a "Standard", the 90 minute rule for re-establishing contingency reserves should not be subject to arbitrary change by the NERC OC. This statement applies across the board to each standard represented in Version 0. In addition, many Reserve Sharing Groups have legally binding contracts in place that cannot easily be changed, resulting in noncompliance.
08		R4	"Applicability" for this standard should include "Reliability Authorities"
08		R1-R5	In general, unless better bounds/criteria are set for the determination of IROLs, this standard will not be enforceable or auditable.
010		R2	Will a new tag template be issued to conform with the functional entities? Will E-tag Spec need to be changed to implement this standard?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		R4	The Drafting Team proposed improvement is acceptable. I still have reservations with the fact that this standard could require me to re-tag a firm dynamic transaction in a window that would cause it to be treated as non-firm for curtailment purposes during TLR. In addition, large balancing authorities which do not have to tag internal transactions, and thus are not subject to this standard, may cause harm to smaller neighboring balancing authorities which are subject to this standard.
014		R4	Load forecasting is the starting point for planning capacity for obligations and thus, deemed to be required for reliability.
016		R1	These requirements should be left to policy 9 in version 0
019		R1	In general, with the large amount of merchant generators, how can we ensure they will register as generator operators and thus comply with these standards?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R10	Adherence to ramp schedules should be required. This requirement is a good example of where developing a meaningful measure may be difficult.
026		R1	Implementation of load shedding should be moved to policy 5 and 9 requirements
028		R1	"AREAS" needs to be redefined in terms of the functional entities.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Comments on proposed NAESB Business Practices:

NAESB Coordinate Interchange Business Practice Standard

Comment: A new tag template which incorporates the new functional model entities needs to be developed and incorporated into the e-tag specification documentation.

Comment: The "Timing Requirements for Reallocation when in a TLR Event" should be waived for all firm dynamic schedules which must be re-tagged for compliance with Reliability Standard 013 Requirement 4 within the "35 minute prior to the top of the hour" window.

NAESB Transmission Loading Relief Standard

Comment: Only the definitions of TLR levels and order of implementation of the TLR process should be included as a Business Practice Standard in order to ensure equitable treatment for curtailments and adjustments of transactions. Actual implementation is a reliability function only and thus, should not be included in the Business Practice Standard.

Area Control Error (ACE) Special Cases

Comment: Tagging requirements for dynamic schedules are governed in Policy 3 Reliability Standards, yet dynamic schedule impacts on the ACE equation are included as a Business Practice. Since ACE dictates compliant Balancing Authority actions associated with performing the BA's required actions for reliable operations, it is important that all components of the ACE equation be governed by through a Reliability Standard.

NAESB Time Error Correction Standard

Comment: Time Error Correction is appropriate for a Business Practice since it has commercial implications associated with ensuring all Balancing Authorities participate. In addition, the Reliability Authority may terminate a time error correction in order to preserve reliability.

NAESB Inadvertent Interchange Standard

Comment: Inadvertent interchange payback can have both commercial and reliable operations impacts and thus should be governed by both Business Practice Standard and Reliability Standard.

Business Standard Emergency Operations

Comment: It is clearly stated that emergency actions shall be performed "regardless of costs". Since Policy 5 provides specific direction for emergency actions that state commercial implications should not be a consideration in mitigating energy emergencies, it is deemed inappropriate to govern these actions through a Business Practice Standard.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Major Issues

The version zero standards state that the Transmission Operator is responsible for load shedding. This is a concern because the Functional Model states that load shed responsibility falls on the Load Serving Entity and the Distribution Provider. (Reference Standards 008 R3 and 009 R10 and reference the Functional Model Version 2 Pages 27, 48, and 40). The drafting team should let the Functional Model determine which entity is responsible for a requirement, not the other way around.

The drafting team states that there is a problem in how the Functional Model addresses hierarchy. Because of this, the group has not been consistent in how it addresses hierarchy issues. In one standard, the group has the Generator Operator reporting problems to the Transmission Operator who reports it to the Reliability Authority. In other standard, the Generator Operator reports directly to the Reliability Authority. (See Version Zero Standard 014 R1 and 016 R1.)

Requirement 018 R1 and R2 is another example in the way the standard drafting team is not being consistent in handling the hierarchy issue. The way the standards read is all three entities are equal and they could independently determine/direct three different paths to solve the same problem. No one entity is held higher than the others.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Please see the issues raised in the response to Question 1.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

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Include these other functions as appropriate in a specific requirement.

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Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

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Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
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Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005		R1	The BA should be the one to insure which GOPs, TOPs, LSEs, and DPs are within its BA Area.
008		R1	The additional language “and the actions being taken to return the system to within limits” changes the scope of the Compliance Template P2T1. Due to the amount of information being reviewed, it is not fair to the industry to make this type of change in version zero.
008		R3	Per the Functional Model, the Transmission Operator orders the LSE and/or the Distribution provider to shed load. The language in this standard requires the TOP to perform this action.
008		Measures	A Control Area Operator is not an entity identified in the Functional Model.
009		R10	Per the Functional Model, the Transmission Operator orders the LSE and/or the Distribution provider to shed load. The language in this standard requires the TOP to perform this action.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
016		R2	The language "may affect the reliability of Interconnected operations" needs to be added back into this standard.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Most of the requirements in the Standards do not have measurements. It is very difficult to review a standard without seeing all the components. Experience with preparing version 1 standards has revealed the difficulty with developing measurements that reflect the requirements, making sure that measurements did not introduce new requirements and assuring that data that is required for the measurement is available in the industry.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

- 1. Lack of measurements**
- 2. Generator testing**

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

It is too early to tell because the standards are not complete.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

For the majority of the standards the functions were appropriately applied. Some of the version 0 standards do not correctly apply the functional model responsibilities to the standards. I have identified inconsistencies in the comments in question 13. There is a problem with the functions currently performed by an RC and the RA functions in the functional model. This needs to be resolved prior to implementing Version 0 standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Version 0 standards should be very clear on the requirements and the assignment of those requirements.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

I agree that all business practices should be moved to NAESB, however "no changes to the reliability rules in Version 0" should include stripping out the intertwined business practices. These standards must meet the reliability intent of the Policy.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

To accomplish this task I would suggest that the version 0 team seek and incorporate input from the subcommittees that are most familiar with the Policies and Standards.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

I agree that the RC requirements map to the RA. I am not sure what you mean when you say existing Control Areas are deemed to be RA. The RA function as it is described in the functional model is a combination of the functions performed by the Control Areas and the Reliability Coordinators as described in current Policies. If the RA is mapped to be the RC the functional model should be modified to reflect the appropriate location for the remaining reliability tasks. Those tasks that are currently performed by Control Areas that are assigned to the RA in the functional model could be re-assigned to the TOP.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Good idea.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R3 and R4	No measurements. Requirement 1 and 2 have measurements but 3 and 4 do not. Every requirement should be measureable or it should not be a requirement. Note this is typical of many standards. There are many cases of the standards having multiple requirements and only one measurement. I will only provide this comment once. I am sure you are familiar with all of the requirements that do not have measurements.
001		M1	The formula on the 5th line has CPR1 instead of CPM1.
001		M2	The first formula in the measure has CPS2 instead of CPM2.
001		Compliance monitoring process	The statement on the reset period seems quite stringent. If you need to go a full calendar month without a violation (defined as a Violation clock-ten minute) it would be almost impossible to reset. A more reasonable reset would be in compliance for a calendar month.
002		Compliance monitoring process	The Compliance Monitoring Process section of this standard references the NERC Performance Standard Training Document. The details of the training document that are necessary for compliance monitoring should be included in the standard. At the end of the measurement section the end of this sentence is missing.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R2	The requirement should state a minimum performance level that must be met by the reserve levels and mix of Operating Reserve - Spinning and Operating Reserve - Supplemental.
002		R3	There appear to be two requirements here. First the requirement to deploy contingency reserves. Second the requirement to review the amount of reserves to be carried. They should be split. There is no measurement included for review of the contingencies on an annual basis and there should be.
002		M1	The first graph in this measurement has 10 min. as the recovery time. This should be generic as in the second graph. The second paragraph of the Determination of AceM or Acem is incomplete and redundant. It should be removed.
002		Reset Period	The reset period should be one calendar quarter without a violation on a reportable disturbance.
003		R1	The section in R2 dealing with calculation of the Bias should be in R1.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
003		R2	There is only one criteria in this measurement the remaining portion is only the method to calculate frequency bias. Calculation methods should be included in R1 and not in R2.
004		All	Time Error Correction is not material to the reliability of bulk electric system. It is an after the fact correction that moves frequency away from 60 Hz. The Purpose is not a purpose but an explanation of an industry practice called time error correction. Time error correction is not in the functional model.
006		All	The requirements do not match the pupose.
006		Levels of Non Compliance	The only non-compliance is related to providing a report and does not support the purpose “to ensure that, over the long term, the BALANCING AUTHORITY AREAS do not excessively depend on other BALANCING AUTHORITY AREAS in the INTERCONNECTION for meeting their demand or INTERCHANGE obligations.”
006		Compliance Monitoring	The Compliance Monitoring Process contains requirements. The level of non-compliance refers to the requirements in the Compliance Monitoring Process instead of the requirements.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
009		R9 and R3	<p>Requirement R9 references a section of policy 2 that does not exist (or the latest version of Policy 2 is not posted on the NERC website).</p> <p>Requirement 3 as stated in policy is related to providing reactive resources within a Control Area. It no longer indicates that because it is now a separate requirement (it is not a sub-requirement of Requirement 2). Remove the BA because it has no responsibilities for reactive resources.</p>
009		Entire Standard	Standard 0009 is in the adobe document twice.
011		R4	The numbering sequence skips R4.
011		R3	<p>“Energy profile, including the ramp (ability of the generation to support the magnitude and maneuverability of the transaction” is not correct. Maneuverability is associated with generation. Please restate as:</p> <ul style="list-style-type: none"> ·Energy profile (ability to support the magnitude of the transaction) ·The ramp (ability of generation maneuverability to accommodate)
013		R1	According to the functional model the Transmission Operator is the transmission entity involved in transmission modifications for reliability events. The Transmission Service Provider should be removed and replaced by the TOP.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014		R1	This requirement as written in Policy 4 is all about providing system operators real-time information on the status of the components of the transmission system. It is not about reporting the information on status to each other and the RA. Those requirements are in different policies. Please change this requirement to reflect the intent of policy 4.
014		R4	In the Functional Model load forecasts are developed by the Load Serving Entity and provided to the Balancing Authority. The BA sends the aggregated information to the RA. The TOP is not involved in this process. Please change the requirement to match the functional model.
014		R6	The functional model says the Transmission Operator (not the Balancing Authority) is responsible for telemeter values. Please revise.
014		R7	In the functional model the TOP does not monitor frequency. As discussed in Policy 9 frequency is a system wide parameter that is monitored by the RC (RA). The BA provides frequency response through the frequency bias setting. Please assign the responsibility for monitoring system frequency to the RA.
015		Measurement	Because requirement 5 the measurement revised to read "Evidence that the RELIABILITY AUTHORITY, BALANCING AUTHORITY, TRANSMISSION OPERATOR, and PURCHASING-SELLING ENTITY is providing the information required, within the time intervals specified therein, and in a format agreed upon by the requesting entities."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
016		R1	This requirement should be split and become two requirements one for the TOP and one for the BA to make it clear who is responsible for providing transmission and generation outage information to the RA.
017		R1, R3, R4, R5 and R6	Balancing Authorities do not have any responsibilities for protection systems. Please remove them from the requirements.
017		R3 and R4	In the fuctional model the Planning authority is responsible for coordinating system prtection systems. Please change the requirement accordingly.
018		R2	The Functional Model says the Balancing Authority “Implements emergency procedures as directed by the Reliability Authority”. Please change to requirement or revise the functional model.
018		R3	The Functional Model says the Reliability Authority issues corrective actions to Transmission Operators, Transmission Service Providers, Balancing Authorities, and Interchange Authorities. The Balancing Authority directs generators to implement redispatch. The Reliability Authority does not communicate directly with Generators for real-time operations including emergencies. Please revise.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020		R1	The Transmission Operator is not responsible for implementing a Capacity and Energy Emergency. Please revise.
021		R1	The RA is responsible for IROLs in the functional model. The TOP is responsible for local reliability. The BA and TOP take direction from the RA. Please change the requirement or change the functional model.
021		R3	The BA cannot disconnect equipment. Remove the BA from this requirement.
024		R1 and R2	These measures are general statements that came from the Introduction section of the policy and cannot be practically measured. The details associated with these statements are contained in the measurements of the policy. These requirements should be deleted.
024		R4	What information would a Transmission Service provider coordinate with a Balancing Authority? Remove the TSP.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R5	According to the functional model BAs and TOPs coordinate current day and next day operations with RAs and RAs coordinate with each other. This requirement does not follow the relationships defined in the functional model. Either this requirement or the functional model should be change so the two are consistent.
024		R7	This requirement is inconsistent with the Functional Model. In the functional model the RA is responsible to “Perform reliability analysis (actual and contingency) for the Reliability Authority Area”. The BA “Implements emergency procedures as directed by the Reliability Authority.
024		R9	In the functional the RA and TOP are responsible for reactive requirements to support voltage. Please remove the BA from this requirement.
024		R11	The BA’s involvement in this process is limited to following the directions of the RA. Please modify this requirement to be consistent with the functional model.
024		R12	In the functional model the BA’s only involvement in this process is to “Complies with reliability requirements specified by Reliability Authority.” Many BA’s today are associated with the marketing function of the company. The BA should not get the results of studies but it should comply with the reliability requirements of the RA.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R16	Remove (e.g. a seven-day forecast of real output). Unless a seven-day forecast is required by another standard. If you want to keep the example change it to a next forecast to be consistent with standard 037.
024		R17	This requirement does not conform to FERC requirements. Information should not be sent to the BA. Many BA's are associated with the parent companies market and should not be provided transmission information.
024		R18	This requirement is only applicable to the TOP. The BA is not responsible for transmission information. Many BA's are associated with the parent companies market and will not have transmission information
025		R1	Any agreement for assistance would include transmission arrangements. BA's are not responsible for transmission. Please modify to include appropriate transmission entities.
025		R4	The BA will not develop emergency transmission procedures. TOPs will not develop procedures associated with insufficient generating capacity. Please correct the requirement accordingly. Please change the last two bullets to read "Develop, maintain a set of plans to implement load shedding for operating emergencies." and "Develop, maintain a set of plans to implement System Restoration."

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

See below for comments on the remaining standards

Standard 025-

R6-Please change to read "The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, AND BALANCING AUTHORITY shall annually review and update their respective emergency plans."

Standard 030-

M1-2 Change NERC Operating Policies to NERC Standards.

Standard 031-

R5-This requirement references attachment 1. There are no attachments to this standard.

M1-The measurement for this standard is a goal not a measurement.

Standard 033-

R3 & R8- The functional model says the Reliability Authority directs actions of Transmission Operators, Transmission Service Providers, Balancing Authorities, and Generator Operators (through the BA). The other entities should be removed from this requirement.

Standard 034-

R2-The functional mode says Distribution Providers provide information to the Reliability Authority. They are not included in this requirement.

Standard 035-

R1- Subtransmission monitoring should not be required unless the subtransmission system is associated with an IROL. Please reword this requirement so it meets the intent of existing Policy 9 requirement.

Standard 038

R6-Time Error Correction is not material to the reliability of bulk electric system and should be eliminated from this standard.

Standard 039-

R7- The reference is incorrect.

Standard 057-

Section 2 : Digital Fault Recorders (DFR's) are no longer considered sufficient to meet the requirements of this standard. If more sophisticated disturbance monitoring equipment is required by the Regional Reliability Councils, sufficient lead time should be provided to the Transmission Owner to accommodate the budget process, engineering, work scheduling and installation. Once the standard is established by the Council, the Transmission Owner should have a minimum of three (3) years to meet the compliance requirements.

Standard 059-

Sections 3, 4, 5 & 6 Conditions required for generator component testing could compromise the reliability of the system and expose the generators to unnecessary equipment risks or unit tripping risks. The requirements for generator component testing at a 5 year frequency is excessive and

introduces additional risks to the system and generator equipment. If this requirement is retained NPPD would suggest that the frequency be changed to 10 years.

Standard 062-

Section 3 : The frequency of the compliance requirements for submittal of dynamic frequency and voltage characteristics of customer demands should be based on the timing of the data submittals for the regional voltage stability studies.

Standard 064-

Section 2 : The requirement for a "documentation of an assessment of coordinated efforts" was added to this standard. Please provide more detail of the "assessment documentation" which is required. Is dynamic and steady state powerflow study work sufficient for this "assessment documentation" ?

Standard 068-

The previous standard III.E. wording included the specific reference to "automatic" UVLS. This term is missing from 068 wording and "automatic" should be included in the new wording for clarification.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
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Comments

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Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
057	1	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.
057	3	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.
057	4	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.
063	1	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.
063	2	M2-1 & M2-2	Eliminate "Distribution Provider" that owns a transmission protection system.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
063	2	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.
063	3	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.
067	1	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.
067	1	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.
067	3	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
067	4	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.
068	1	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.
068	3	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.
068	4	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.
068	5	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	1	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.
069	2	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.
069	4	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.
069	5	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.
069	6	M6-2	The "shall have evidence" phrase is vague and may be unnecessary considering that the requesting entity should know if its requested information is supplied.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
071	1	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.
071	2	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.
071	3	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.
071	4	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

As presented, the Bonneville Power Administration - Power Business Line (BPA-PBL) supports the translation of the existing standards to those proposed in Version 0. However, we do believe field-testing must allow flexibility to change measurements, as necessary. Furthermore, for those policies, standards and measurements undergoing field-testing, stopgap measures that avoid reporting 'non-compliance' is necessary.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

None

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

BPA-PBL disagrees with the translation of “Generation Providing Entity” to the Functional Model term “Purchasing-Selling Entity”. We have addressed the specifics of these concerns described in the comments we have provided within our answer to question 5.

With this one exception, BPA-PBL agrees with the remainder of the translation of existing NERC reliability rules in Version 0.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

We believe the requirements should be re-organized to group them into logical areas, eliminating redundancies, and removing the need to interpret how to simultaneously comply with separate yet related requirements. In each case, we ask the drafting team needs to ensure that duplication is in fact the issue. We also ask that in its background and questionnaires for future drafts of Version 0, the drafting specifically describe the areas of duplication that were found and how the standards and requirements were reorganized to address these types of issues. Additionally, we ask that the drafting team include in its questionnaire specific questions asking the industry whether or not these redundancies are handled in a way that is both technically correct and clearly understood.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Except for the following issue BPA- PBL agrees with the designation of the functions in the Functional Model.

In the process of translating the entities referred to in Policy 3 to their Functional Model equivalents, all references to "Generation Providing Entity" were changed to "Purchasing Selling Entity". Though all of the Generating Providing Entities referred to in Policy 3 are, by definition, Purchasing Selling Entities within the Reliability Functional Model, they are only a subset of all of the Purchasing Selling Entities. The problem with this translation is that it results in Version 0 inadvertently "changing existing policy" by extending the tagging rights that Policy 3 to all Purchasing Selling Entities that are NOT Generating Providing Entities. This extension of tagging rights is in direct conflict with the fundamental Version 0 requirement that "changes to existing policies and procedures would not occur."

Therefore, we feel that it is imperative that the translation of Generation Providing Entity from Policy 3 be changed such that the chosen entity defined within the Reliability Functional Model is exactly equivalent to those referred to in existing Policy 3.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Though we agree with the allocation of potential Business Practices to NAESB , we do not believe these business practices should be totally separated from Version 0 Reliability Standards at this time. All requirements governing actions to be taken by any Functional Model Entity during the hour of delivery has a direct impact upon reliability. Therefore, these practices should all be contained within the NERC Reliability Standards.

Though we feel that all of these requirements should be contained within the same integrated set of standards, we feel that there are ways to accomplish this while still enabling NAESB to utilize their processes to develop those parts of these procedures that are determined to be "Business Practices".

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

We do not see how it would be possible to both implement the Interchange Authority function and meet the Version 0 requirement to "not change existing policies and procedures". Therefore, we agree with retaining the Balancing Authority to Balancing Authority scheduling methods currently in practice until Version 1 standards can be developed later for adopting and implementing the Interchange Authority function.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Phase 3 field-testing has been performed, comments sent to NERC, however, to date, these comments have not been incorporated into Phase 3 standards.

We recommend field-testing include circulating to the industry the revised standards that have incorporated the comments for an additional review and approval. This will ensure industry approval of the standards. Furthermore, it is our recommendation that until standards and assorted measurements have been field-tested and refined, as necessary, reporting of non-compliance be relaxed.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R1	The Resources Subcommittee has the authority to set and approve epsilon. Why did the Drafting Team shift this authority to the Operating Committee? Subtle though it may seem, this "change to existing policy" moves this technical determination from a technical group to a policy group. To ensure the technical integrity of this calculation, the authority to set epsilon should remain with the Resources Subcommittee.
001		R3	For clarity purposes, please define Overlap Regulation, as it is used in this standard. If the reader is to reply upon a definition in a NERC Glossary please reference it in this standard so that uninformed readers know how to access this definition.
001		R4	For clarity purposes, please define Overlap Regulation, as it is used in this standard. If the reader is to reply upon a definition in a NERC Glossary please reference it in this standard so that uninformed readers know how to access this definition.
001		M1	To avoid the potential for "gaming", this Standard should include requirements and/or measurements, to ensure that the "sustained interruption" clause of this measure is used seldom enough to guarantee that the resultant CPM2 calculation is representative of the Balancing Authority's actual operation. If not covered in present NERC policy, then please pass this comment on to the appropriate Version 1 drafting teams.
002		R4	The Disturbance Recovery Period referenced at the end of this requirement should be a separate requirement.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R6	This is an area where reducing redundancy will lead to greater clarity. Please re-write these requirements to be clearer than the 90-minutes in the second paragraph is indeed referring Contingency Reserve Restoration Period that was described in the first paragraph.
ALL		ALL	Where possible, please give each Requirement and Measure a descriptive name (i.e. access to contingency reserves, having contingency reserve policies, deployment of contingency reserves, DCM compliance, etc). This will assist operators to be better able to discern which requirement and measure is which and be able to find the specific one(s) that are applicable most quickly and efficiently.
003		R2	Please revise scope of this requirement to include only those things pertaining specifically to the requirement to operate AGC on tie-line bias control. The remaining information on how the BA is to calculate its Frequency Bias setting, including that on fixed versus variable bias setting and how they should be calculated should be moved to Standard 003 R1, which is the specific requirement for calculation of Frequency Bias Obligation.
003		R3	Please replace the term "should", used at the end of this requirement, to the more positive and definitive term "shall". In this case, "should" is still being used in reference to the requirement that a party receiving energy from a joint unit via a flat schedule NOT include "their share of the governor droop" in their frequency bias setting.
004		Purpose	What is written here is far more of a "why" than a "what is the purpose". For clarity to those unfamiliar, please start with an "executive summary" type statement along the lines of "purpose is to adjust the interconnection frequency as required to correct the time errors, as reflected by electric clocks that utilize system frequency as a basis for keeping time".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
004		new	Add a specific requirement for all Balancing Authorities to participate in all Time Error Corrections, as instructed by the Reliability Authority that has been designated as the Time Keeper for the interconnection.
004		R1	Each of the 3 statements in this "requirement" is actually a separate and distinct "requirement" that would result in separate and distinct measurements. These requirements also apply to different entities. Therefore, the requirements in this section should be separated into three separate requirements.
005		R6	Each of the 3 statements in this "requirement" is actually a separate and distinct "requirement" that would result in separate and distinct measurements. Therefore, the requirements in this section should be separated into three separate requirements.
005		R7	The requirements for frequency of ACE calculation and use of separate and redundant frequency metering equipment are separate, distinct, and not necessarily related requirements that will result in equally separate and distinct measurements. Therefore, these should be listed as separate requirements.
005		R11	Each of the 4 statements in this "requirement" is actually a separate and distinct "requirement" that would result in separate and distinct measurements. Therefore, the 4 requirements in this section should be separated into 4 separate requirements, as they were in Policy 1.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005		R13	<p>The 2 statements in this "requirement" are actually separate and distinct "requirements" that would result in separate and distinct measurements. These requirements also apply to different entities. Therefore, the requirements in this section should be separated into three separate requirements.</p>
005		R14	<p>Each of the 4 statements in this "requirement" is actually a separate and distinct "requirement" that would result in separate and distinct measurements. Therefore, the requirements in this section should be separated into four separate requirements.</p>
006		Purpose	<p>The second and third sentences of this purpose statement do not specifically address the purpose of this standard. It is definition and background. As such, it should be moved to a separate "background information" type of section.</p>
006		R1 - R5	<p>These requirements correctly describe how to calculate Inadvertent Interchange. However, they fail to actually address the stated purposes of the standard, which are to ensure that both "reliability is not compromised by inadvertent flows" and "Balancing Authorities do not excessively depend upon (others) ". Please either modify the purpose to reflect the requirements or add requirements that address the purposes as stated.</p>
009		R6	<p>The requirements to maintain sufficient Reactive Resources and to locate them in a dispersed manner are separate and distinct requirements that result in very different measurements for compliance. Therefore, we feel that these requirements should be separated.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
009		8	The requirements on "how to operate when the voltage regulator is out of service" and that to "inform the Transmission Operator of the status of all generation reactive sources" are separate and distinct requirements that result in very different measurements for compliance. Therefore, we feel that these requirements should be separated.
011		R1	Please modify this requirement to the need to provide this information to the Generation Operator, as required in Policy 3A Requirement 2.2. Without this information, the Generation Operator has no way of ensuring that tags were not submitted for his generator to produce more services than it either contracted to provide or is able to provide at the time.
011		NEW	Add a requirement requiring Generation Operators to communicate their approval or denial of the tag; in much the way as those requirements for the BA and the TSP to approve or deny the tag. This requirement is part of Policy 3A Requirement 4. Addition of this requirement is necessary in order to make the requirements of Version 0 the same as those of Policy 3 in this regard.
013		R4	We agree with the modified language on when the tags for Dynamic Schedules must be modified.
015		R5	We agree that this is a correct translation of existing NERC policy. However, we are concerned that, as written, it requires the PSE to provide ANY information that a BA or TSP may request " in the name of reliable operations". Given the issues involved, we feel that the issue of scope of information required should be addressed later in a Version 1 type of revision to this standard.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
017		R5	We agree drafting team's position that the Generation Operator should report through either the Transmission Provider or the BA, as appropriate.
019		R1	We feel that if the Generation Operator is obligated to respond to real time requests from a BA or TP, etc. to modify their operations (i.e. congestion Management, IOS Services, etc), then they must have the necessary voice and data communications links. Otherwise, it may not be necessary for the Generation Operator to have this type of communications available.
024		R10	Yes, we feel that this requirement is both necessary and enforceable.
028		Purpose	Please replace "reliability entity needs to Authorities" with the appropriate language. This sentence does not make sense as written.
039		R2	The specifics of the WECC Unscheduled Flow Mitigation Plan are governed by a contract amongst WECC members that has been filed with FERC. This contract provides for a specific committee to manage all operational aspects of this Unscheduled FLOW Relief Plan. Therefore, we feel that the WECC UFMP should remain a WECC Regional Curtailment Procedure and NOT be included as a part of Version 0 standards.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
053	INTRO FOR SECT 1.C	Introduction	Reinsert following text: All facilities involved in the generation transmission and use of electricity must be properly connected to the interconnected transmission system to avoid degrading the reliability of the electric systems to which they are connected
053	Planning Section 2 Requirements	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).
057	Planning Section 1 Requirements	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 maintainance and testing and will there be consistency in how the maintenance and testing is measured across regions?

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

This affirmative vote assumes that measurements that have not completed field testing/due process are excluded from the Version 0 standards. (See our responses to Questions #3, # 11 and # 12).

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Yes, see our responses to Questions # 1, #3, # 11, and # 12)

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The inclusion of generator standards that have not been through due process causes a significant change in the obligations imposed on the generator operators/owners.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

We do not believe developing new responsibilities should be included as the translation of the Operating Policies.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No Comment

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

No Comment

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

There were a significant number of comments recommending numerous "fixes" to the III.C standards/measurements when they were field tested. These comments have not yet been addressed, and should be considered in Version 1. If any of the III.C measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

All Phase IV standards/measurements require significant "fixes" and should be considered in Version 1, not Version 0. However, we realize that there may be other factors influencing the decision to keep some of these in Version 0. If any Phase IV measurements are included in Version 0, standards should be revised as per previously provided comments, and then they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

No additional comments

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization:					
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: SERC (Operations) Compliance Subcommittee					
Lead Contact Raymond Vice		Organization: Southern Co.			
Telephone: (205) 257-6209		Email: rlvice@southernco.com			
Member Names	Organization	Segment	Member Names	Organization	Segment
Raymond Vice	Southern Company	1, 3, 5	Carter Edge	Southeastern Electric Power Administration	5, 9
Melinda Montgomery	Entergy Services	1, 3, 5	Doug Newbauer	Georgia System Operations Corp.	1, 5
Vern Colbert	Dominion Virginia Power	1, 3, 5	Lee Xanthakos	South Carolina Electric and Gas	1, 3, 5
John Troha	SERC	2	Dick Worthen	SERC	2

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

See attached detailed comments. These comments are on the Operating section of the Ver. 0 Standards only. Note that individual members of the SERC (Operations) Compliance Subcommittee drafted various sections of the attached document. It was compiled to meet the Ver. 0 SDT review deadline and provide guidance for SERC members. Unfortunately, this did not allow the level of detailed review that would normally accompany such an effort, thus there may be inconsistencies in both formatting and content.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Yes. We noted three obvious unsupported changes to existing policy. Std. 26, R4, Std. 34, R1 and Std. 38, R7. These must be changed to reflect policy or the references from which they were taken shown in detail.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Overall good effort, given the time allowed, but definitely needs more work.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Any variation from existing policy or compliance template language should be well documented and explained in order to allow reviewers to follow the logic of the change.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

There is an on going confusion in the hierarchy of the functions and how they relate to each other that causes confusion in some of the standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Very controversial area. Subject to many interpretations. No clear consensus at this time.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

See Attached free form comments. Sorry that we did not have time to put them in the standard format for your automated process.

SERC Compliance Subcommittee Comments
General Comments
Revision 0

1. We found three major areas where Version 0 appears to have changed policy in the translation from the Operating Policies to the Version 0 Standards :
 - a. Standard 26, Requirement 4 varied significantly from existing Policy or Compliance Template meaning. The current version of Std. 26, R4 seems to require that automatic load shedding be implemented upon under frequency, under frequency rate of change, under voltage, under voltage rate of change or power flow levels have reached agreed upon levels. Current Policy 6, Section C, Requirement 1.2.1 requires only that automatic load shedding be “related” to one or more of these conditions.
 - b. Standard 34, Requirement 1 varied significantly from existing Policy or Compliance Template meaning. Policy 9 used the word “may” when referring to monitoring of sub-transmission. Std. 34, R1 has replaced this with “shall” making it mandatory that the RA monitor sub-transmission regardless of local conditions. This is a change in policy.
 - c. Standard 38, Requirement 7 language does not appear to come out of current NERC policy, although it does appear to conform to current Eastern Interconnection practice.. There is no language to support this requirement in the specified reference to Policy 9, Section E, Requirement 1.4.5. Please provide a reference showing the origin of this requirement.
2. In general, there appear to be a number of coordination or hierarchy of authority confusions relating to the translation of the terms “operating authority” or “control area” into the function model terms Reliability Authority, Balancing Authority and Transmission Operator. In a number of cases, these three terms work well. In others, the specific functions to be performed can not be performed by all three of these entities without risking major coordination problems or violating FERC Order 889. The solution to this is, in general, to establish a hierarchy of control related to these areas and put one entity, generally the Reliability Coordinator, in charge of the required actions. This, however, may vary too much from current policy language and may have to await development of Version 1 standards.
3. There is a need to clean up the specific language of the Standard Titles and purpose statements. In most cases, these were ported over from the Operating Policies without major revision. In some cases, this works well. In others, however, the language of the policy does not do justice to the needs of a stand alone standard. For instance, it is sometimes difficult to tell what the standard is meant to accomplish without referring to the title of the original policy from which it was derived. In other cases, the purpose or introduction to the policy includes requirements which should be in the body of the policy (or standard), and not in the purpose or introduction.
4. There are also a number of minor administrative or typographical errors that need to be cleaned up. This document was developed and published in an amazingly short period of time and, in places, this shows. Some pages appear to be out of

order in the original document and there are missing comments and references. In particular, there are requirements from the policies that have no corresponding requirement in the standards. This appears to be because they are duplicated in other areas. This should be well documented however, in order to prevent confusion and aid reviewers in assuring themselves that all requirements have been covered.

5. In comparing Policy 9 to Standards 33 – 40 in Version 0, it was determined that the following requirements of Policy 9 were either omitted from Version 0, or not translated clearly enough for us to make a connection:

- 9A Requirements 1.3 & 4
- 9B Requirement
- 9C Requirement 1.1, 1.2, & 1.5
- 9D Requirements 2 & 3
- 9E Requirements 1.4 & 1.4.1
- 9F Requirements 1, 2, 3, 4, 4.1, 5, & 6
- 9J Requirement 1.3

SERC Compliance Subcommittee Comments
Standard 001
Revision 0

- Requirement R1
 - The drafting team assumed NERC Operating Committee will be the authority to set and approve epsilon. Current Policy 1A 1.1 states epsilon is reviewed and set as necessary by the NERC Resource Subcommittee. While this is noted in the comments, my recommendation is the Resource Subcommittee should be referenced in version 0.
- Requirement R2
 - No comments
- Requirement R3
 - Suggest changing CPM1 and CPM2 to CPS1 and CPS2 to preserve the Policy 1A designations. I agree that CPM1 and CPM2 may be better choices to communicate measures instead of standard but suggest those changes appear in Revision 1.
 - Reference for R3 should be Policy 1A 2.2
- Requirement R4
 - Reference for R4 should be Policy 1A 2.3
- Addition of Requirement R5
 - Suggest adding R5
 - Balancing Authorities providing or receiving supplemental regulating services through dynamic transfer shall continue to be evaluated on the characteristics of its own ACE with the supplemental regulation service included.
 - Reference is Policy 1A 2.1
 - See comments, Measurement M2
- Measurement M1
 - Suggest CPM1, for revision 0, be changed to CPS1
 - The definition of “clock-minute average” needs to add the phrase “as well as for the control area’s frequency bias”

A clock-minute average is the average of the reporting Balancing Authority’s valid measured variable (i.e. for ACE and for frequency error, as well as for the control area’s frequency bias) for each sampling cycle during a given clock-minute.
 - Reference is Performance Standard Reference Document C 1.1.1.1
- Measurement M2

- Suggest CPM2 be changed to CPS2 to preserve the Policy 1 designations
 - Reference Policy 1A Requirement 2.2.1 should be Performance Standard Reference Document, 1.2.1
 - Reference Policy 1A Requirement 2.2.2 should be Performance Standard Reference Document, 1.2.2
 - Reference Policy 1A Requirement 2.2.2.1 should be Performance Standard Reference Document, 1.2.2.1
 - Suggest “A Balancing Authority providing or receiving SUPPLEMENTAL REGULATION SERVICE though DYNAMIC TRANSFER shall “ be removed from M2 and included as a requirement (see suggestion to add R5 above).
- Compliance Monitoring Process
 - The Standard Drafting Team recommends this section be removed from Version 0. If this section remains:
 - Reference to NERC Standard Training Document be changed to NERC Performance Standard Reference Document
 - Suggest CPM1 and CPM2 be changed to CPS1 and CPS2 respectively as previously discussed

SERC Compliance Subcommittee Comments
Standard 002
Revision 0

- Purpose
 - Change Disturbance Control Performance Standard to Disturbance Control Standard
- Requirement R2
 - Suggest changing Regional Reliability Organization to region and Regional Reliability Organization to subregion to preserve the language in Policy 1 B.
 - Reference should be Policy 1B 1.2
- Requirement R3
 - Suggest changing Disturbance Control Performance Measure M1 (DCM) to NERC Disturbance Control Standard.
 - References should be Policy 1B 2 and Policy 1B 2.1
- Requirement R4
 - Suggest changing DCM to DCS
 - Add the NERC Resources Subcommittee as an additional approver for adjustment for the default performance criterion
 - References are Policy 1B 2.2.1 and Policy 1B 2.2.2
- Requirement R5
 - Suggest changing DCM to DCS
 - References are Policy 1B 2.3 , Policy 1B 2.3.1 and Policy 1B 2.3.2
- Requirement R6
 - References are Policy 1B, 3, Policy 1B 3.1 and Policy 1B 3.2
- Measurement M1
 - For $ACE_A < 0$, ACE_A should be changed to ACE_M for the R_i equation
 - ACE_M should be changed to ACE_m when referenced to minimum algebraic value of ACE
 - ACE_m should be changed to ACE_M when referenced to maximum algebraic value of ACE
 - Strike sentence “In the illustration to the right, the horizontal line...”. This is part of an example.
 - The words “disturbance, i.e. $ACE_m = ACE_{15 \text{ min}}$ “ was omitted from the last sentence (Performance Standard Reference Document C 2.3)
 - Suggest removing the graph unless an example is going to be added in this measurement for clarification

- Reference should be Performance Standard Reference Document C2, C 2.1, and C 2.3
- Compliance Monitoring Process
 - Change NERC Performance Standard Training Document to NERC Performance Standard Reference Document
 - Under Periodic Control, change CONTROL AREAS to BALANCING AUTHORITIES
 - Include reference to P1 G 2.1.2
- Full Compliance
 - Change Performance Standard Training Document to Standard Reference Document
- Levels of Non Compliance
 - Change reference to Policy 1B 4 and Policy 1B 5
 - Suggest adding verbiage and equations from Performance Standard Reference Document 4.3 for Contingency Reserve Adjustment Factor (CRA) similar to that done previously for CPS
- Supporting Notes
 - Consider reformatting for clarity. There are four major topics: Reportable Disturbances, Treatment of Multiple Contingencies, and Multiple Contingencies within the Reportable Disturbance Period, and Multiple Contingencies within the Contingency Reserve Restoration Period.
 - References should be Policy 1 B 2.4, Policy 1B 2.5.1-3

SERC Compliance Subcommittee Comments
Standard 003
Revision 0

- Purpose
 - Suggest changing purpose statement to “A standard method for determining each Balancing Authorities’ or Reserve Sharing Group’s Frequency Bias to ensure accurate measurement of ACE”

- Requirement R1
 - No comments

- Requirement R2
 - Change references to Policy 1C Standards 1.1, Policy 1C Standards 1.11-1.1.2

- Requirement R3
 - Reference is Policy 1C 1.1.3

- Requirement R4
 - Reference is Policy 1C 1.15 and Policy 1C 1.1.6

- Requirement R5
 - Reference is Policy 1C 1.1.6

SERC Compliance Subcommittee Comments
Standard 004
Revision 0

- No comments

SERC Compliance Subcommittee Comments
Standard 005
Revision 0

- **No Comments**

SERC Compliance Subcommittee Comments
Standard 006
Revision 0

- **No Comments**

SERC Compliance Subcommittee Comments
Standard 007
Revision 0

- Applicability
 - Perhaps this standard should also apply to Generator Operators since they have a role to play in maintaining system stability and avoiding cascading outages (see requirement R8 of Standard 009).
- Requirement 1
 - Add to Existing Document Reference as Standard 1
- Requirement 2
 - Existing Document Reference should cite Standard 1.1 rather than Requirement 1.1. Also we concur that language and examples for multiple outage criteria should be addressed in future revisions along with better references of what constitutes a SOL or IROL violation.

SERC Compliance Subcommittee Comments
Standard 008
Revision 0

- Applicability
 - This standard should also apply to Reliability Authorities since several of the requirements are for RAs or otherwise mention RAs
- Requirement 5
 - The Existing Document Reference is shown as Requirement 2.1.1, which doesn't appear to exist in current policy. This should probably be referenced as Standard 2.11 or otherwise clarified.
- Compliance Table
 - The statement below the table at the end of the compliance section seems to assume that all IROLs are based on flow. This is not a universally accepted assumption.

SERC Compliance Subcommittee Comments
Standard 009
Revision 0

- Requirement 8
 - The Existing Document Reference should be Requirement 4 rather than 4.2. There is no 4.2.
- Requirement 9
 - Same as above, there is no 4.1.
- General
 - Guides 1 through 3 following the Voltage and Reactive Controls in Section B appear to be incorporated in the text of the new operating standards themselves. If so, this should be referenced.
 - Guide 4 on DC Equipment does not appear to be included in the new standards. If it has been deleted, this should be noted in the comments.
 - Guide 5 on Reactive Capability Testing appears to be included in the Planning Standards, Standard 59 et.al. If so, this should be referenced also.

SERC Compliance Subcommittee Comments
Standard 010
Revision 0

- General
 - We support having the requirement to submit a tag, and the minimum timing of such submission as a reliability standard, due to the importance of accurate scheduling to reliability.
- Measures
 - The existing measure should be designated as M1, and another measure added. The additional measure, M2, should measure how well the PSE followed the requirements of this standard. M2: A PSE shall meet 100% of the tagging requirements for all scheduled interchange for which it is responsible, and do so in a timely manner.
- Requirement 8
 - The Existing Document Reference should be Requirement 4 rather than 4.2. There is no 4.2.
- Compliance Monitoring Process
 - The monitoring process for this standard should be a tag survey when requested by the OC, during a compliance or readiness audit or investigation of unusual conditions.
- Levels of Non-Compliance
 - For M1, should be based upon the number or percentage of non-tagged transactions.
 - For M2, should be based upon either the number or percentage of non-tagged transactions, or upon the number of late tags submitted.
- Compliance Monitoring Process and Levels of Non-Compliance
 - Although I realize that the version 0 team is not adding these sections to the text at this time, I think that it is important that issues related to compliance be addressed early in the standards drafting process.

SERC Compliance Subcommittee Comments
Standard 011
Revision 0

- General
 - We support having the requirement to assess interchange transactions as a reliability standard, due to the importance of accurate scheduling to reliability.
- Applicability
 - Either the Reliability Coordinator should be included in the applicability section, and have a requirement describing the criteria for assessing interchange transactions prior to approval, or the Reliability Coordinator should not be included in Requirement R1 as one of the entities who is to be provided the tag for assessment.
- Requirement 1
 - Having the RA and the Security Analysis Service as entities to receive the interchange transaction is redundant if the RA is supposed to receive the transaction via the IDC. If the RA is to have approval rights, the RA should receive the transaction prior to approval. If the RA is provided the tag for information purposes only, after approval by the other entities has been completed, the RA does not need to be included in R1.
- Requirement 2
 - OASIS reservation accommodates multiple Interchange Transactions. This is not clear. Should be reworded to indicate that the transmission reservation indicated on the tag must be sufficient to accommodate the energy profile of all interchange transactions that use that reservation in aggregate.
- Compliance Monitoring Process and Levels of Non-Compliance
 - Although I realize that the version 0 team is not adding these sections to the text at this time, I think that it is important that issues related to compliance be addressed early in the standards drafting process.
 - The BA, or TO is 100% compliant with this standard when they provide documentation of their approval criteria for interchange transactions, and documentation of their approval process. This should be done during the compliance or readiness audit, or during an investigation.
 - The BA or TO would be non-compliant based on either their lack of documentation for their approval criteria, or their inability to demonstrate that they have an approval process that is used. Probably there would only be two level of non-compliance needed for this standard.

SERC Compliance Subcommittee Comments
Standard 012
Revision 0

- General
 - We support having the requirement to confirm interchange transactions as a reliability standard, due to the importance of accurate scheduling to reliability.
- Purpose
 - The word AGC should be removed.
 -
- Requirement 1
 - It seems unnecessary to have both “the Balancing Authority’s AREA CONTROL ERROR equation or in the system that calculates that Balancing Authority’s AREA CONTROL ERROR equation.” Either the BA’s ACE, or the system that... would be adequate to convey the meaning of the sentence.
 - In the discussion of default ramp rates, there should be some indication that the Balancing Authorities can agree to a ramp duration other than the default. In sub-bullet (c), the text should be changed to indicate that ramp durations may be shorter than the default but must be identical and agreed to by the sending and receiving Balancing Authorities.
- Compliance Monitoring Process and Levels of Non-Compliance
 - Although I realize that the version 0 team is not adding these sections to the text at this time, I think that it is important that issues related to compliance be addressed early in the standards drafting process.
 - I propose the following measures for this standard:
 - M1: the BA can provide documentation that agreements are in place with neighboring Bas as to how schedule confirmation will be performed.
 - M2: the BA can provide evidence showing that for a random sample of X hours, confirmation was performed according to agreements before the schedule change began. These could be done via self-certification, during the compliance or readiness audit, or in response to an investigation.
 - For M1, Level 1 would be process in place but not documented, level 4 would be no process in place.
 - For M2, the level of non-compliance would be related to either the number or percentage of schedules not confirmed during random sample.

SERC Compliance Subcommittee Comments
Standard 013
Revision 0

- General
 - We support having the requirement to modify interchange transactions as a reliability standard, due to the importance of accurate scheduling to reliability, and the importance of keeping the information in the IDC up to date with changes to interchange transactions.
- Requirement 2
 - Both the Source and Sink BA are responsible for implementing the required modifications, not just the Sink.
 - Also, the Sending and Receiving Balancing Authorities should be responsible for re-confirming their interchange schedule when a modification takes place. This requirement should also include the fact that all Balancing Authorities, Transmission Service Providers, Reliability Authorities (if these are to be included in standard 11), and Security Analysis Service are to be notified of the modification as soon as possible.
- Requirements 3
 - Change “allow reloading” to “reload”. Change “release of the limit” to “reload”. Should include the requirement that the Source and Sink BA are responsible for reloading the transactions, that the sending and receiving Bas should re-confirm upon receipt of the reload instruction, and that all the Balancing Authorities, Transmission Service Providers, Reliability Authorities (if these are to be included in standard 011) and Security Analysis Service are to be notified of the reload as soon as possible.
- Requirements 4
 - The proposed language is superior to the language in the current version of Policy 3. We would support changing R4 to include the following as proposed by the Version 0 drafting team. “A Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall modify the tag when the energy profile deviates from the previously tagged profile as follows: - The transaction is 100 MW or less and the deviation is more than 10 MW; or – The transaction is greater than 100 MW and the deviation is greater than 10 %.
- Compliance Monitoring Process and Levels of Non-Compliance
 - Although I realize that the version 0 team is not adding these sections to the text at this time, I think that it is important that issues related to compliance be addressed early in the standards drafting process.

SERC Compliance Subcommittee Comments
Standard 014
Revision 0

- General
 - We do not feel that there is sufficient redundancy to eliminate the general requirement to coordinate system availability and outages with the affected Balancing Authorities, Reliability Authorities and Transmission Operators
- Requirement 1
 - We agree with the hierarchy of reporting for reliability
- Requirement 2
 - We agree with the translation
- Requirement 3
 - We agree with the translation
- Requirement 4
 - Load forecasting is not required for reliability. It is a function of determining resource adequacy. Weather data is required for its effect on applicable facility ratings at various loading levels.
- Requirement 5
 - We agree with the translation
- Requirement 6
 - We agree with the translation
- Requirement 7
 - We agree with the translation

SERC Compliance Subcommittee Comments
Standard 015
Revision 0

- Requirement 1
 - This tracks with Standard 014, R6. We agree with the translation. We suggest that the last sentence be modified for clarity: “~~and~~ including which data must be supplied electronically.”
- Requirement 2
 - We agree with the translation
- Requirement 3
 - We agree with the translation
- Requirement 4
 - We agree with the intent of the translation if “Addendum A” (not included) is translated to “Attachment 1”.
- Requirement 5
 - We agree with the translation
- Measures
 - We agree with the translation
- Compliance Monitoring Process
 - We do not understand the comment to remove compliance monitoring from the Version 0 Standards.
- Levels of Non-Compliance
 - We do not agree with the scope of Level 1 – non-compliance. Consistency of delivery is not defined in the requirements of this standard.
 - “Operating Authority” should be translated to “Reliability Authority, Balancing Authority, Transmission Operator, and Purchasing Selling Entity”. “Reliability Coordinator” should be translated to “Reliability Authority”.
 - There should be evidence that the “list” of required data has been provided to the entity submitting data.

SERC Compliance Subcommittee Comments
Standard 016
Revision 0

- General
 - We agree with the hierarchy of reporting for reliability.
 - Reporting of automatic voltage regulators is redundant with the Planning Standards. This standard is the appropriate place for the redundant requirement.
 - We agree with the requirement for the Reliability Authority to resolve potential reliability conflicts.
 - We suggest that the “supporting note” that each “neighboring responsible entity shall develop and share a list of critical facilities it will receive notification of future and actual outages” be made a Requirement for Balancing Authorities and Transmission Operators to be shared with directly connected Balancing Authorities and Transmission Operators.
- Requirement 1
 - We agree with using the Policy 9 reporting deadlines. The requirement to coordinate with the directly connected Balancing Authorities and Transmission operators per P4T4 seems to have been lost in translation with the requirement being only to provide information to the Reliability Authority.
- Requirement 2
 - We agree with the translation.
- Requirement 3
 - We agree with the translation.
- Requirement 4
 - We agree with the translation.
- Measures
 - The requirement to coordinate with the directly connected Balancing Authorities and Transmission Operators per P4T4 seems to have been lost in translation with the requirement being only to provide information to the Reliability Authority.
- Compliance Monitoring Process
 - We agree with the Periodic Review and Reset Period translations.
 - As it is written, we do not understand the third paragraph dealing with Reliability Authorities’ requests for outages to not be taken. Is this intended to be a trigger for an investigation or is it intended to be a direct report of non-compliance to NERC, bypassing the Regional Compliance process?
- Levels of Non-Compliance
 - As mentioned above, the requirement to coordinate with the directly connected Balancing Authorities and Transmission Operators per P4T4 seems to have been lost in translation with the requirement being only to provide information to the Reliability Authority.

SERC Compliance Subcommittee Comments
Standard 017
Revision 0

- General
 - We agree with the reporting hierarchy for reliability
- Requirement 1
 - We agree in general with the translation, although the requirement is made more specific by including “in their area”. It brings to mind the question of the mechanism by which they are to know what is specifically in their area in the detail inferred.
- Requirement 2
 - We agree with the translation
- Requirement 3
 - We agree with the translation
- Requirement 4
 - We agree with the translation
 - Major transmission lines should be defined.
- Requirement 5
 - We agree with the translation
- Requirement 6
 - We agree with the translation

SERC Compliance Subcommittee Comments
Standard 018
Revision 0

- Title
 - Should be modified to include the word Emergency. For example : Emergency Reliability Responsibilities and Authorities. As written, you have to read the body of the standard to understand that it applies to emergency operations only. Note that these standards will not be associated with Policy 5 – Emergency Operations in the future and should have stand alone descriptive titles. [Minor Issue](#)
- General
 - It would be useful to include an explicit explanation of why Policy 5A Requirement 1 was not included in Standard 018. I assume it is because it is redundant with Standard 008, but, as a general rule, any time a redundant section of policy is not included as a standard an explanation of why should be included in the comment section (business practice reference, reference document number or an explanation of why it is not applicable).
 - Similar reference requirements for Policy 5A Requirements 3, 7, 8, 9, 10 and 12. [Minor Issue](#)
- Requirement 3
 - Consider adding **Market Operator** to the list of Operating Authorities. Specifically, it should be included in R3 as being required to comply with all reliability directives and, perhaps, in R5 as being required to provide emergency assistance as requested.
- Requirement 4 and Requirement 6
 - Should specify that the local Reliability Authority will handle all communications with other potentially impacted Reliability Coordinators. As written (Reliability Authority or ...), these requirements could lead to multiple notifications and potential confusion as to exactly what action is going to happen or has taken place.
 - In general, all communications with adjacent Reliability Authorities should be through the local Reliability Coordinator. (Note that R4 may intend that RA contact other RAs, etc., but this is not clear and could easily be misinterpreted.)
 - At a minimum, this needs to be clarified.

SERC Compliance Subcommittee Comments
Standard 019
Revision 0

- Title
 - Modify title to include the word Emergency as noted in Std. 018 above. [Minor Issue](#)

SERC Compliance Subcommittee Comments
Standard 020
Revision 0

- Title
 - Modify title to read “Implementation of Emergency Capacity and Energy Plans” **Minor Issue**
- Requirement 3 and Requirement 5
 - These appear to be redundant. I suggest keeping R5, since it is more explicit and better laid out.

SERC Compliance Subcommittee Comments
Standard 021
Revision 0

- General
 - PDF document has this standard out of order (unless 21 is supposed to come after 25 – new math, I guess or maybe that’s how they count in Canada, eh Ev?) [Minor Issue](#)
- Requirement 1
 - Using both the Transmission Operator and the Balancing Authority as the responsible entities make sense, since each of them can impact SOL/IROL conditions on the transmission network.
 - It is not clear at all, however, how the Balancing Authority will know what to do or when to do it unless directed by the Transmission Operator or the Reliability Authority.
 - In fact, independent operation by the Balancing Authority to manage SOL/IROL conditions on the transmission network without explicit direction from the Transmission Operator or the Reliability Authority would seem to be counter productive, if not down right dangerous.
- General
 - I suggest that this standard be rewritten to direct the Transmission Operator to act independently to relieve SOL/IROL conditions in an emergency, up to and including directing the appropriate Balancing Authority(ies) to change reactive or real power output.
 - Note that I assume that this should be done under the independent authority of the Transmission Operator rather than at the direction of the Reliability Authority only under emergency conditions. (May require Ver. 1 Standard)

SERC Compliance Subcommittee Comments
Standard 022
Revision 0

- Purpose
 - Statement too wordy and broad.
 - Should be shortened and kept to a functional description of the reason that the standard is required : To ensure that disturbances and unusual events that threaten the reliability of the Bulk Electric System are reported to the appropriate entities in sufficient detail for post analysis and to minimize the likelihood of similar events in the future. **Minor Issue**
- Requirement 3
 - Making the Reliability Authority, Transmission Operator and Balancing Authority all responsible for disturbance reporting seems to be prone to causing confusion over who is doing what.
 - I would suggest making the Reliability Authority responsible for Disturbance Reporting with the Transmission Operator and Balancing Authority responsible for :
 - 1) identifying potential disturbances for reporting and
 - 2) supporting the Reliability Coordinator in the data collection and analysis phases of the reporting. **(May require Ver. 1 Standard)**
 - Current wording seems to indicate that the Reliability Authority, Transmission Operator and Balancing Authority must all report independently on each disturbance. I do not believe that was the intent of the original language. **Note that the DOE EIA-417 form does not use functional model terminology and refers to Control Areas and Reliability Coordinators.**

SERC Compliance Subcommittee Comments
Standard 023
Revision 0

- No comments.

SERC Compliance Subcommittee Comments
Standard 024
Revision 0

- Title
 - Needs to be re-written to be more indicative of what the standard is about. I suggest “Operations Planning for Normal Conditions.” **Minor Issue**
- General
 - Hierarchical structure seems to be implied, but not explicitly defined in the translation of Control Area and Reliability Coordinator language to functional model language.
 - May want to consider writing requirements such that all Balancing Authorities and Transmission Operators within a given Reliability Authority’s area should coordinate their operations planning, etc.
 - Reliability Authorities would then be responsible for coordination between each other, etc.
 - Seems confusing and/or difficult to follow as written.
- Requirement 14
 - I suggest that the authority to require real or reactive power testing be centralized at the Reliability Authority level only.
 - Any Transmission Operator or Balancing Authority requiring such tests should coordinate through the Reliability Authority. **(May require Ver. 1 Standard)**
- Requirement 17
 - Notification of transmission status or rating changes to Balancing Authorities should be limited to those that materially impact the Balancing Authority and may not be allowed under FERC order 889 if Balancing Authority is a market participant (in such cases only notification of limits on generation output will be permitted).

SERC Compliance Subcommittee Comments
Standard 025
Revision 0

- Title
 - Needs to be re-written to be more indicative of what the standard is about.
 - I suggest “Operations Planning for Emergency Conditions.”
 - Existing title seems to imply that it is for Operations Planning that you do only during and Emergency, not in preparation for the emergency.
[Minor Issue](#)
- Requirement 1
 - Reference should be Policy 6, Section B, Requirement 1. [Minor Issue](#)
- Requirement 3
 - Not clear that Operating Authority, as used in the Operating Policy Manual, refers only to Reliability Authority and Transmission Operator, although the use of IROL language does imply this.
 - The Balancing Authority must also have a plan for shedding load to match generation to load and this should be part of his operations planning, however, this may be redundant with Policy 1 or R4 requirements and may not be considered an IROL.
 - Also seems that Distribution Provider and/or Load Serving Entity should be involved in the implementation phase. [Minor Issue \(confused myself\)](#)

SERC Compliance Subcommittee Comments
Standard 026
Revision 0

- Purpose
 - Seems more like a requirement than a purpose. Shorten and simplify. Minor Issue. I agree with the Ver. 0 SDT that both the operations planning and implementation stages of load shedding are mingled in Policy 6, Section C. I recommend that they be separated into two distinct standards.
- Requirement 1
 - Concept is certainly redundant. However, I couldn't find where the specific wording is set forth so succinctly in any other requirement. **Minor Issue**
- Page Layout Problem
 - Requirements R5 through R8 for Standard 026 follow standard 027 in my copy of the PDF document. **Minor Issue**
- Requirement 4
 - Language of the standard does not appear to faithfully replicate the meaning of the original policy (Policy 6, Section C, Requirement 1.2.1).
 - Policy says that automatic load shedding shall be “related to one of the following” conditions whereas the standard states that the operating authority “shall initiate automatic load shedding” upon one of the conditions occurring.
 - **This is a definite change in policy, whether intended or not. MAJOR ISSUE.**

SERC Compliance Subcommittee Comments
Standard 027
Revision 0

- Purpose
 - Well written and succinct.
- Requirement 1
 - Language from Policy 6 applying to Control Areas does not fit well with functional model entities.
 - Balancing Authorities and their associated Transmission Operators can not logically and independently develop plans to “reestablish its electric system.”
 - Wording needs to be modified to reflect the interdependencies between functional model entities. **Minor Issue**
- Requirement 2
 - – R1 comment above also applies to restoration planning. **Minor Issue**
- Requirement 4
 - I concur with the Ver. 0 SDT comment to R4 that the restoration of the integrity of the Interconnection should be explicitly emphasized as the penultimate goal of restoration activities.
- General
 - Overall, these requirements seem to miss the interdependent nature of restoration planning or implementation in a functional model environment.
 - In particular, the close coupling between black start units, transmission line switching and load pickup following a blackout is not well addressed (if it is addressed at all).
 - This section needs major work. **(May require Ver. 1 Standard)**

SERC Compliance Subcommittee Comments
Standard 028
Revision 0

- General
 - Follows Compliance Template P6T2 which does not follow Operating Policy 6, Section D, but which was approved by the NERC Board of Trustees. There is no support in policy for this. Old Issue

SERC Compliance Subcommittee Comments
Standard 029
Revision 0

- Requirement 1
 - The reference in the comment column is that “There may be redundancy here with Policy 5A Requirement 1” is not understood.
 - The section referenced in Policy 5A – 1 concerns operating within SOL and IROL limits and does not address telecommunications facilities. Please clarify.
 - Also, in searching the new standards a specific instance of the old Policy 5A Requirement 1 could not be found.
- Requirement 5
 - Add to Existing Document Reference: “Policy 7 – C1”
- Requirement 6
 - Add to Existing Document Reference: “Policy 7 – D1”

SERC Compliance Subcommittee Comments
Standard 030
Revision 0

- General
 - We support the requirement and measures associated with this standard.
- Compliance Monitoring Process
 - The Data Retention requirement for this standard should be 1 year.
 - The probability exists that over time, the job description and perhaps other documentation will be modified.
 - There should not be a requirement to keep past versions of authorizing documents for an indefinite period of time.

SERC Compliance Subcommittee Comments
Standard 031
Revision 0

- General
 - We support the requirement and measures associated with this standard.
- Requirement 1
 - There is no Attachment 1 provided.
- Measures
 - Should have an M2 indicating that training records shall be reviewed to ensure that the required 40 hours of training and drills in system emergencies was provided.

SERC Compliance Subcommittee Comments
Standard 032
Revision 0

- General
 - We support the requirement and measures associated with this standard.
- Requirement and Measures
 - The requirement and measure do not differentiate between levels of certification. For example, as currently written, an operator holding a Transmission Operator Certificate could work in a Balancing Authority, or Reliability Authority since he is “NERC-Certified”.
 - As a minimum to work in a Balancing Authority the operator must have either a valid Balancing-Interchange Certificate, Combination Balancing-Interchange-Transmission Certificate or Reliability Certificate.
 - There should be a similar requirement for Transmission Operators to hold either a Transmission Certificate, Combination Balancing-Interchange-Transmission Certificate or Reliability Certificate, and for the Reliability Authority Operator to hold a Reliability Authority Certificate.
 - This should be explicitly stated.

SERC Compliance Subcommittee Comments
Standard 033
Revision 0

- Purpose
 - The Purpose makes requirements by using words like “must”. The purpose should be rewritten to simply describe the reason the standard exists.

SERC Compliance Subcommittee Comments
Standard 034
Revision 0

- Requirement 3
 - In the Requirement, the word “AND” is capitalized when it should not be.
- Requirement 7
 - The word “wide area” should be capitalized.
- Requirement 9
 - The word “affects” should be replaced by “effects”

SERC Compliance Subcommittee Comments
Standard 035
Revision 0

- Purpose
 - The purpose should be rewritten to simply describe the reason the standard exists. Again, requirements do not belong in the Purpose of a document.
- Requirement 1
 - The wording here changes Policy.
 - Policy 9 used the word “may” when referring to monitoring of sub-transmission. Version 0 has replaced this with “shall” making it mandatory that the RA monitor sub-transmission.
 - **This is a change in policy. Major Issue**
- Requirement 2
 - The wording in this requirement is confusing. Perhaps some rewording would make it easier to understand.

SERC Compliance Subcommittee Comments
Standard 036
Revision 0

- No comments.

SERC Compliance Subcommittee Comments
Standard 037
Revision 0

- Requirement 1
 - R1 should be broken into two requirements.

SERC Compliance Subcommittee Comments
Standard 038
Revision 0

- Requirement 7
 - The requirements here do not appear to come out of current NERC policy, although it does confirm to current Eastern Interconnection practice. There is no language to support this requirement in the specified reference to Policy 9, Section E, Requirement 1.4.5. **Major Issue**
- Requirement 11
 - This requirement shows an inconsistency in how RAs are to communicate with Generator Operators. In some cases Version 0 implies that the RA will only communicate with them through the BAs, while in other instances the RA is required to talk directly to the Generator Operators. The Drafting Team needs to make a clear determination of proper communication flows and make sure that it is accurately and consistently reflected in Version 0.
- Requirement 19
 - Policy 9C is referenced here when in fact it should be 9E

SERC Compliance Subcommittee Comments
Standard 039
Revision 0

- Requirement 7
 - The wrong reference is used. This requirement comes from Policy 9, Section F, Requirement 3.3

SERC Compliance Subcommittee Comments
Standard 040
Revision 0

- No Comment.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The reason I would not approve the Version 0 Standards is phase 3 and 4 planning standards are included in Version 0 Standards and they should be removed . I also have concerns that the functions named as responsible parties for each standard has been very liberal. Functions have been named as reponsible when the subject is outside of their task or relationships. This does not mean that the number of functions used should be reduced. If a LSE has a requirement, then the LSE should be the resposble party. The responsible function should not be shifted up to simply reduced the number of functions named

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Inclusion of phase 3 and 4 planning standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

I believe functions have been listed that have no responsibilities for the requirements.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

If a function has responsibility for the requirement, it should be listed as the responsible function and not depend on service agreements.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The Reliability Coordinator is an organization resulting from the NERC Security Process several years ago. Trying to force the RC and the RA as one has caused much confusion. The Functional Model described functions that Control areas do in maintaining reliability. Today, RCs are delegated tasks from Control Areas primarily for a wider view. One of the problems was not all RCs was the same. The revisions to Policy 9 helped clarify the responsibilities of RCs. I agree with your intent to provide flexibility in meeting the applicable standards I would not had assumed all RCs would be RAs.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
1		Compliance Monitoring Process	Why will the Compliance Monitoring Process be removed from the Version 0 Standards? Won't they have to be re-inserted at a later date?
2		M1	Something is missing between Determination of ACEM or ACEm and the following ACE chart.
5		R4	This requirement could be an example of redundancy in that it could be handled in Standard 001 to the extent that Standard 001 and 005 could be combined.
9		R3	The BA is not responsible for this requirement
9		R5	Should be incorporated into R4.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
10		Regional Differences	SPP also has a scheduling agent waiver and should be a regional difference
12		Regional Differences	SPP also has a scheduling agent waiver and should be a regional difference
14		R2	The BA is not responsible for this requirement
14		R3	The BA is not responsible for this requirement
14		R4	Load forecasting, or the ability to "predict the system's near-term load pattern" is a reliability issue.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
15			A requirement is needed for the GOPs, LSEs, and DPs to provide information.
17		R3 & R4	The BA is not responsible for this requirement
17		R5	Agree with DT
24		R10	I don't fully appreciate the comment that the DST has inserted for this requirement. I would not be comfortable if this requirement were deleted.
25		R4	The list should be included in the standard as a list of considerations for the plan but not as required actions.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
26		R4	This requirement calls for the TO or BA to manually initiate automatic load shedding schemes. Manual intervention should not be required for automatic load shedding schemes.
26		Purpose	Yes, some of these requirements could be carefully moved to the emergency operations standard.
27		R4	Leave the requirement as it is currently worded.
28		Applicability	Should Generation Operators be included?
34		R3	We do not feel that the requirement needs any additional clarification. Also, TOs and BAs do not have an obligation to supply other RAs information through the NERC SDX, the RA has that obligation.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
38		R17	Can not find a duplicate requirement in Standard 029. Standard 029 addresses communications facilities while this requirement deals with the mechanics of voice communications.
28		Purpose	Shouldn't the purpose read:Each Reliability Authority shall have a plan to continue reliability operations in the event its control center becomes inoperable.
51			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.
53			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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Members of my organization has expressed concerns that many of the "should" has been changed to "shall" changing it from a guideline to a requirement.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by August 9, 2004. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name: Gerald Rheault					
Manitoba Hydro					
204-487-5423					
gnrheault@hydro.mb.ca					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators			
<input checked="" type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable					
Group Comments		Group Name:			
Lead Contact		Organization: Manitoba Hydro			
Telephone:		Email:			
Member Names	Organization	Segment	Member Names	Organization	Segment
Robert Coish					
Blaine Poff					
Doug Rempel					
Lorne Midford					

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Manitoba Hydro applauds the accomplishments of the Standards Drafting Team in trying to provide a useful document for comments under a ridiculously short time line. Manitoba Hydro recognizes that much has been accomplished by the Standards Drafting Team in the very short time that was available to create these documents. However we are concerned that the short 30 day comment period has not allowed us , and we expect, many other stakeholders, the time to adequately review the documents.

The documents contain a large number of deficiencies, inaccuracies, ambiguities, incorrect references, gaps from operating standards, and omissions which must be addressed before the Standards will be ready for ballot. Had there been sufficient time for the Standards Drafting team to work on this effort, we doubt that this would have been the case. We are not looking forward to both the effort and cost to review these documents again, but that is the reality. We are unsure that the language presented from the existing polices and standards will translate into enforceable language.

Manitoba Hydro would vote against approval of the Standards if they were balloted as is..

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The issues which could be a "show stopper" are the following:

1. Inclusion of phase 3 and 4 Standards in the Version 0 Standards. The phase 3 and 4 Standards either have not been revised based on the field test results or have not been field tested at all. Therefore there are a number of problems with these Standards and they are not suitable for enforcement and the potential penalties that could be imposed under the Version 0 process. However if these Standards are not included in the Version 0 package there will be a significant gap in the Reliability Standards.

Manitoba hydro believes that the way to resolve this dilemma is the following:

- a. Include the phase 3 and 4 Standards in the Version 0 submitted for approval by the industry**
- b. Waive enforcement and the application of penalties for these phase 3 and 4 Standards until they have been adequately field tested and modified.**

2. There are many gaps and inconsistencies between Standards and sections of Standards which must be addressed to make the documents acceptable. Some of these are presented in question 13.

3. There are missing elements in the Standards derived from the Operating Policies, such as no measures section included in the document which must be corrected.

If the issues listed above are not adequately addressed in future postings, Manitoba Hydro will not support the Version 0 Standards when they are submitted for a vote.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The content of Version 0 Standards is a poor translation of existing reliability rules. There are many gaps and missing elements in the Standards derived from the Operating Policies, as illustrated in question 13, which must be corrected before they can be considered acceptable.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Manitoba Hydro believes that the Version 0 Standards should ultimately be modified to reduce redundancies and better group the requirements. This should result in Standards that are easier to understand and implement.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Manitoba Hydro believes that NERC should specify to the industry how the Functional Model will function to ensure that each entity accomplishes the responsibilities for which they are responsible under the Reliability Standards. This is very important to ensure that necessary actions are taken in a timely fashion to maintain the reliability of the network. The Functional Model is vague in defining who has ultimate responsibility for ensuring reliable operation of the network. Manitoba Hydro believes this responsibility should lie with the Reliability Authority and that this should be clearly defined in the Functional Model. Manitoba Hydro's operating staff in their review of the Standards and the Functional Model expressed concern that under the present version of the Functional Model the lines of authority between the different entities is not adequately defined and would like to see these more clearly defined.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

NERC/NAESB have established a process to determine what elements of the existing Standards and Policies should become Reliability Standards and which ones should become Business Standards. Manitoba Hydro does not believe it is appropriate to request the industry to define which elements are Reliability Standards and which ones are Business Standards. If some of the decisions made by the joint committee are considered wrong the industry should respond at that time.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Manitoba Hydro is confused by this question.

The Version 0 Reliability Standards are to reference the Functional Model. In the Functional Model, there is no reference to the Reliability Coordinator but the Reliability Authority is defined. Therefore these Standards should only reference the Reliability Authority and not the Reliability Coordinator. Effort should be made to implement the Functional Model at the same time as the Reliability Standards are implemented to ensure clarity and conformity. However, if this is not possible, then NERC will have a problem since these two functions do not map to each other on a one to one basis. This problem should be addressed on a case by case basis by NERC as a transition problem till the switchover to Reliability Authority occurs and should not be dealt with in the present exercise of developing the Version 0 Standards which is a large enough task in itself.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.

■ Disagree.

Comments

Manitoba Hydro does not agree with this approach.

The Reliability Standards are intended to reflect the Functional Model. The Functional Model included an Interchange Authority function and therefore this function should be included in the Version 0 Standards. Although the new tools and procedures as well as reliability obligations may not be ready for the initial version 0 implementation date Manitoba Hydro believes the Reliability Standards should correctly reflect the Interchange Authority functional requirements even if they cannot be implemented at that time.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

In question 2 above Manitoba Hydro has indicated that these Standards should be implemented in Version 0 but that they should have no penalties applied to them till they have been modified to reflect field test experience.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

In question 2 above Manitoba Hydro has indicated that these Standards should be implemented in Version 0 but that they should have no penalties applied to them till they have been field tested and modified to reflect field test experience.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R3	Existing Document References: Policy 1A Requirement 2.4 should be 2.2
		R4	Existing Document References: Policy 1A Requirement 2.5 should be 2.3
		M1	<p>CPR1=(2-CF)*100% Standards Reference Doc states: CPS1=(2-CF)*100%</p> <p>There is a large number of Existing Document References that seem to be wrong all through the document as well as quite a number were missing. The NERC Operating manual from June 15, 2004 was reviewed and the references didn't line up. It becomes quite a bit of work when the wrong references are listed. Here is a sample:</p> <p>P1A Requirement 2.1.1 Should be: Performance Standard Reference Document, C. Calc of Compliance 1.1.1.1 P1 A. 2.1.1.2 should be Performance Standard Reference Document 1.1.1.2 P1 A. 2.1.1.3 should be Performance Standard Reference Document 1.1.1.3 P1 A. 2.1.2 should be Performance Standard Reference Document 1.1.2</p>
002		M1	Regions Regional Reliability Council may, at their discretion, require a lower reporting threshold.
		Compliance Monitoring Process	<p>Periodic Review CONTROL AREAS Balancing Authorities and/or RESERVE SHARING GROUPS must return one completed copy of DCS DCM form "NERC Control Performance Standard Survey-All Interconnections" each quarter to the Region as per set dates. The Regional Reliability Council must submit a summary document reporting compliance with DCS DCM to NERC no later than the 20th day of the month following the end of the quarter. Periodic Compliance Monitoring Compliance for DCS DCM will be evaluated for each</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			reporting period. Each BALANCING AUTHORITY or RESERVE SHARING GROUP shall submit one completed copy of DCS DCM Form,
		Full compliance	CONTROL AREA Balancing Authority or RESERVE SHARING GROUP returned the ACE to zero or to its pre-disturbance level within the DISTURBANCE RECOVERY PERIOD, following the start of all Reportable Disturbances. DCS DCM is calculated quarterly and compliance evaluated as the Average Percentage Recovery (APR) as defined in the Performance Standard Training Document.
		Levels of non compliance	Each Balancing Authority or Reserve Sharing Group not meeting the Disturbance Control Standard Measure during a given calendar quarter shall increase its Contingency Reserve obligation for the calendar quarter (offset by one month) following the evaluation by the NERC or Region Compliance Monitor . [e.g. For the first calendar quarter of the year, the penalty is applied for May, June, and July.] The increase shall be directly proportional to the non-compliance with the Disturbance Control Standard Measure in the preceding quarter. This adjustment is not compounded across quarters, and is an additional percentage of reserve needed beyond the Most Severe Single Contingency. A Reserve Sharing Group may choose an allocation method for increasing its Contingency Reserve for the Reserve Sharing Group provided that this increase is fully allocated A representative from each Balancing Authority or Reserve Sharing Group that was non-compliant in the calendar quarter most recently completed shall provide written documentation verifying that the Balancing Authority or Reserve Sharing Group will apply the appropriate Disturbance Control Performance Adjustment beginning the first day of the succeeding month, and will continue to apply it for three months. The written documentation shall accompany the quarterly Disturbance Control Standard Measure Report when a Balancing Authority or Reserve Sharing Group is non-compliant.
			Reportable Disturbances. Reportable Disturbances are contingencies that are greater than or equal to 80% of the Most Severe Single Contingency loss. Region may optionally reduce the 80% threshold, provided that normal operating characteristics are not being considered or misrepresented as contingencies. Normal operating characteristics are excluded because DCS DCM only measures the recovery from sudden,

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			unanticipated losses of supply-side resources.
		MW loss	Retain the value of MW loss used in DCS DCM calculation.
		ACEA	Retain the value of ACEA used in DCS DCM calculation.
		ACEM	Retain the value of ACEM used in the DCS calculation.
		ACEm	Retain the value of ACEm used in the DCS DCM calculation.
003		R1	<p>Each BALANCING AUTHORITY shall establish and maintain a Frequency Bias Setting that closely matches or is greater than its system response.</p> <p>Policy 1 C. Frequency Response and Bias 1.3. Bias setting verification. Each CONTROL AREA must be able to demonstrate and verify to the Performance Subcommittee that its FREQUENCY BIAS SETTING closely matches or is greater than its system response.</p> <p>Slight change in meaning. The BA no longer has to demonstrate and verify to P.S. that it's Bias setting closely matches or is greater than it's system response?</p>
004		R1	<p>Any RELIABILITY AUTHORITY in an INTERCONNECTION shall have the authority to terminate a time error correction in progress for reliability considerations. (change from original statement)</p> <p>Policy 1 D. Time Control Standard Any RELIABILITY COORDINATOR in an INTERCONNECTION may request the termination of a time error correction in progress.</p>
005		Compliance monitoring process	<p>Within one week upon request, BALANCING AUTHORITIES shall provide NERC or the Regional Reliability Organization CPS CPM source data in daily CSV files with time stamped one minute averages of: 1) ACE and 2) Frequency Deviation from Schedule.</p> <p>Within one week upon request, BALANCING AUTHORITIES shall provide NERC or the Regional Reliability Organization DCS DCM source data in CSV files with time stamped scan rate values for: 1) ACE and 2) Frequency Deviation from Schedule for a time period, from two minute prior to thirty minutes after the identified</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			disturbance.
008		R5	This should be considered as a compliance monitoring or administrative procedure rather than a standard. Agree
		Measures	Evidence that the Reliability Authority evaluated actions and provided direction as required to the Control Area Operator Balancing Authority? or Transmission Operator to return the system to within limits.
		Levels of non compliance	The limit violation was reported to the RELIABILITY COORDINATOR Reliability Authority who did not provide appropriate direction to the Transmission Operator resulting in an IROL violation in excess of 30 minutes duration.
009		R5	This requirement may be somewhat redundant with Requirement 4, unless this requirement can be clarified to refer to more urgent actions to avoid a critical voltage violation. Agree.
		R9	The TRANSMISSION OPERATOR shall provide information on the status of all transmission reactive power resources, to its RELIABILITY AUTHORITY. There is no reference to this in Policy 2 B.
014		R1	BALANCING AUTHORITIES shall inform the RELIABILITY AUTHORITY and other affected BALANCING AUTHORITIES and TRANSMISSION OPERATORS of all generation and transmission resources available for use. There is no reference to this in Policy 4
		R4	Is load forecasting required for reliability or not, if not, why is this information required? Load forecasting is required for reliability as there is a need to predict possible shortages due to high loads.
015		R3	Upon request, RELIABILITY AUTHORITIES shall, via the ISN, exchange with each other operating data that is necessary to allow the RELIABILITY AUTHORITIES to perform their operational reliability assessments and coordinate their reliable operations. RELIABILITY AUTHORITIES shall share with each other the types of data as listed in Attachment 1, unless otherwise agreed to. Policy 4 Requirement 4 Upon request, RELIABILITY COORDINATORS shall, via the ISN, exchange with each other Electric Security Data that is necessary to allow the RELIABILITY COORDINATORS to perform their operational security

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			assessments and coordinate their reliable operations. Is Operating Data the same as Electric Security Data?
		R4	BALANCING AUTHORITIES and TRANSMISSION OPERATORS and shall provide the types of data as listed in Addendum A , unless otherwise agreed to by the BALANCING AUTHORITIES and TRANSMISSION OPERATORS with immediate responsibility for operational security. Should it be Addendum or Appendix?
016		Applicability	This standard provides another example of the question whether Generator Operators are intended to be part of "Operating Authorities" or should their obligations be addressed through service agreements? I believe Generator Operators obligations should be addressed through service agreements with the TO and or BA.
		R1	Drafting Team assumes the time requirement is based on noon prevailing time of the RELIABILITY AUTHORITY, although it is not clear from Policy 4. Policy 9 states specific times for the Eastern and Western Interconnections. The Drafting Team recommends using the Policy 9 time requirements. Agree with comment.
		Measures	Monitored entity shall report and coordinate scheduled generator and/or bulk transmission outages to its RELIABILITY AUTHORITY and others indicated in the requirements above. The translation to standards is suppose to specifically identify entities.
		Compliance Monitoring Process	Periodic Review: The Regional Reliability Councils shall conduct a review every three years to ensure that each Operating Authority has a process in place to provide planned generator and/or bulk transmission outage information to their Reliability Coordinator Authority, and with neighboring Control Areas Transmission Operators and Balancing Authorities. Investigation: At the discretion of the RRC RRO or NERC, an investigation may be initiated to review the planned outage process of monitored entity due to a complaint of non-compliance by another entity. Notification of an investigation must be made by the RRC RRO to the entity being investigated as soon as possible, but no later than 60 days after the event. The form and manner of the investigation will be set by NERC and/or the RRC RRO.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>Monitored entity: The translation to standards is supposed to specifically identify entities.</p>
017		R5	<p>Additional work is required to clarify the reporting hierarchy. The Drafting Team does not believe the Generator Operator would report directly to the Reliability Authority, but would report through the Transmission Operator or Balancing Authority. This hierarchy question affects a number of requirements in several standards.</p> <p>Agree with comment.</p>
018		R4	<p>The RELIABILITY AUTHORITY, BALANCING AUTHORITY, and TRANSMISSION OPERATOR shall inform other potentially affected RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS of real time or anticipated emergency conditions, and take actions to avoid when possible, or mitigate the emergency.</p> <p>Policy 4 A Requirement 4</p> <p>To facilitate emergency assistance, the OPERATING AUTHORITY shall inform other potentially affected OPERATING AUTHORITIES and its RELIABILITY COORDINATOR of real time or anticipated emergency conditions, and take actions to avoid when possible, or mitigate the emergency.</p> <p>The policy states the operating authority shall inform other potentially affected operating authorities and it's RC. The new standard makes it sound like any one of the RA, BA or TO can inform affected RA's. The BA and TO should notify other TO's and BA's but should notify their own RA who in turn should notify other RA's.</p>
		R5	<p>The RELIABILITY AUTHORITY, BALANCING AUTHORITY, and TRANSMISSION OPERATOR shall render all available emergency assistance requested, provided that the requesting entity RA, BA or TO has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, or regulatory or statutory requirements.</p> <p>The DISTRIBUTION PROVIDER and LOAD SERVING ENTITY shall assist the requesting entity BA or TO, unless such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>The translation to standards is supposed to specifically identify entities.</p>
019		R1	<p>The BALANCING AUTHORITY, TRANSMISSION OPERATOR, and GENERATOR OPERATOR shall have</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>communications (voice and data links) with appropriate RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS. Such communications shall be staffed and available for addressing a realtime emergency condition.</p> <p>Policy 5 B. Requirement 1. The OPERATING AUTHORITY shall have communications (voice and data links) to appropriate entities within its OPERATING AUTHORITY AREA, which are staffed and available to act in addressing a real time emergency condition. The meaning is changed with this statement. It's not the communications that shall be staffed, it's the Operating authority (RA, BA or TO) which shall be staffed to address the real time emergency condition.</p>
020		R2	<p>The BALANCING AUTHORITY and TRANSMISSION OPERATOR shall communicate their current and future system conditions to neighboring BALANCING AUTHORITY and TRANSMISSION OPERATORS and their RELIABILITY COORDINATOR Authority if they are experiencing an operating emergency.</p>
		M1	<p>At the discretion of the Regional Reliability Council Organization or NERC, an investigation may be initiated to review the operation of a Balancing Authority or Transmission Operator when they have implemented their Capacity and Energy Emergency plans. Notification of an investigation must be made by the Regional Reliability Council Organization to the BALANCING AUTHORITY OR TRANSMISSION OPERATOR being investigated as soon as possible, but no later than 60 days after the event.</p>
		M2	<p>Data Retention: The Balancing Authority and Transmission Operator is required to maintain operational data, logs and voice recordings relevant to the implementation of the Capacity and Energy Emergency Plans for 60 days following the implementation. After an investigation is completed, the Regional Reliability Council Organization is required to keep the report of the investigation on file for two years.</p>
022		Purpose	<p>It is important that the facts surrounding a disturbance shall be made available to RELIABILITY AUTHORITIES, TRANSMISSION OPERATORS, Regional Councils Organizations, NERC, and regulatory agencies entitled to the information.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
		R1	Each Regional Council Organization shall establish and maintain a Regional reporting procedure to facilitate preparation of preliminary and final disturbance reports.
		R3	<p>RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS responsible for investigating an incident shall provide a preliminary written report to their Regional Council Organization and NERC....</p> <p>In such cases, the affected RELIABILITY AUTHORITY, BALANCING AUTHORITY, or TRANSMISSION OPERATOR shall notify its Regional Council(s) Organization and NERC promptly and verbally provide as much information as is available at that time. The affected RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS shall then provide timely, periodic verbal updates until adequate information is available to issue a written Preliminary Disturbance Report. If in the judgment of the Regional Council Organization, after consultation with the RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS in which a disturbance occurred, a final report is required, the affected RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS shall prepare this report within 60 days.</p>
		R4	When a BULK ELECTRIC SYSTEM disturbance occurs, the Regional Council's Organization's OC and DAWG representatives shall make themselves available to the RELIABILITY AUTHORITIES, BALANCING AUTHORITIES, and TRANSMISSION OPERATORS immediately affected to provide any needed assistance in the investigation and to assist in the preparation of a final report.
		R5	The Regional Council Organization shall track and review the status of all final report recommendations at least twice each year to ensure they are being acted upon in a timely manner. If any recommendation has not been acted on within two years, or if Regional Council Organization tracking and review indicates at any time that any recommendation is not being acted on with sufficient diligence, the Regional Council Organization shall notify the NERC Planning Committee and Operating Committee of the status of the recommendation(s) and the steps the Regional Council Organization has taken to accelerate implementation.
024		R10	Each BALANCING AUTHORITY shall plan to meet

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>Interchange Schedules. All GENERATOR OPERATORS shall operate their plant(s) so as to adhere to ramp schedules.</p> <p>Comments: The Drafting Team questions the meaning of this requirement and whether it is necessary or enforceable. Does this refer to the Interchange schedule or the unit's ramp rate? If the Interchange schedule, then wouldn't this fall under the Balancing Authority?</p>
		R15	<p>Comments: This may be redundant with a similar requirement in Standard 009. Update standard 009 to include this section.</p>
		R18	<p>Comments: It may be more appropriate to add this requirement to each applicable requirement above. Agree with comments.</p>
025		R5	<p>Comments: The Drafting Team asks whether the list of "must" statements describing the emergency plans in Compliance Template P6T1 should be included here. Those items are listed in Policy 6B as guides, but then shown as requirements in the Compliance Template. List of "must" statements should be included.</p>
026		Purpose	<p>After taking all other remedial steps, a RELIABILITY AUTHORITY, BALANCING AUTHORITY and TRANSMISSION OPERATOR operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the INTERCONNECTION."</p> <p>The purpose statement is the same as the first requirement; the purpose should talk about load shedding plans not actions.</p>
027		R1	<p>This plan shall be coordinated with other RELIABILITY AUTHORITIES, TRANSMISSION OPERATORS, and BALANCING AUTHORITIES in the INTERCONNECTION to ensure a consistent INTERCONNECTION restoration plan. This is the same statement as R5, either this sentence should be removed from R1 or remove R5.</p>
		R4	<p>Comments: The Drafting Team believes this requirement should be clarified to indicate the restoration plan should have as a priority restoring the integrity of the Interconnection. Agree with comments.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		Existing Document references	Operating Policy 6 – Operations Planning Section E – Loss of Primary Control Facilities Continuity of Operations
		Purpose	Each reliability entity needs to AUTHORITIES shall have a plan to continue reliability operations in the event its control center becomes inoperable. Requires rewording.
		Compliance monitoring process.	Self-Certification: Each RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY shall annually, self-certify to the Regional Reliability Organization that the following criteria have been met: 1. The necessary operating instructions and procedures for restoring loads, including identification of critical load requirements. 2. A set of procedures for annual review and updated for simulating and, where practical, actual testing and verification of the plan resources and procedures (at least every three years). 3. Documentation must be retained in the personnel training records that operating personnel have been trained annually in the implementation of the plan and have participated in restoration exercises. These are from compliance template P6T2 dealing with restoration plans not P6T3 dealing with loss of primary control facility.
		Levels of non compliance	Level 1 — Plan exists but is not reviewed annually. Level 2 — Plan exists but does not address one of the 10 requirements. Level 3 — N/A Level 4 — Plan exists but does not address two or more of the nine requirements or there is no Restoration Plan in place. These levels of non compliance refer to restoration not loss of primary control facilities.
029		R1	Each RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY shall provide adequate and reliable telecommunications facilities internally and with other RELIABILITY AUTHORITIES, TRANSMISSION OPERATORS, and BALANCING AUTHORITIES for the exchange of INTERCONNECTION and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed. Comments: There may be redundancy here with Policy 5A

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>Requirement 1. Disagree. Policy 5 A. deals with operating within limits not providing adequate and reliable telecommunications.</p> <p>Policy 5 A - Operating Authority Responsibilities Requirements 1. Operating within limits. The OPERATING AUTHORITY shall operate within the SYSTEM OPERATING LIMITS (SOLs) and INTERCONNECTION RELIABILITY OPERATING LIMITS (IROLs).</p>
031		Levels of non compliance	<p>Level 3 — The RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, and BALANCING AUTHORITY have not completed Criterion 2 of Requirement 1. <i>Is this not referring to requirement 2?</i></p>
033		R4	<p>RELIABILITY AUTHORITIES that delegate tasks to other entities shall have formal operating agreements with entity to which tasks are delegated. The RELIABILITY AUTHORITY shall verify that all delegated tasks are understood, communicated, and addressed by all BA, TO, GO, TSP, LSE and PSE within its RELIABILITY AUTHORITY AREA. All responsibilities for complying with NERC and regional standards shall remain with the RELIABILITY AUTHORITY. <i>The translation to standards is supposed to specifically identify entities.</i></p>
034		R1	<p>Comments: This requirement could be moved to Standard 029. <i>Agree with comments.</i></p>
		R2	<p>The RELIABILITY AUTHORITY shall determine the data requirements to support its reliability coordination tasks and shall request such data from its BALANCING AUTHORITIES, TRANSMISSION OPERATORS, TRANSMISSION OWNERS, GENERATION OWNERS, GENERATION OPERATORS, and LOADSERVING ENTITIES or ADJACENT RELIABILITY AUTHORITIES. <i>How does Appendix 4B, "Electric System Security Data, Section A, Electric System Security Data", tie into this requirement?</i></p> <p>Comments: Related to Standard 029. <i>Disagree with comments, standard 029 deals with telecommunications not type of data required.</i></p>
		R3	<p>Comments:</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>A clearer version of this requirement may be: Upon request, RELIABILITY AUTHORITIES shall, via the ISN, exchange with each other operating data that is necessary to allow the RELIABILITY AUTHORITIES to perform their operational reliability assessments and coordinate their reliable operations. RELIABILITY AUTHORITIES shall share with each other the types of data as listed in Attachment A, unless otherwise agreed to.</p> <p>I agree with the highlighted section but the statement precludes the Balancing Authorities and Transmission Operators which need to be included as in R3.</p> <p>The Drafting Team asks: do TRANSMISSION OPERATORS and BALANCING AUTHORITIES have obligations to supply RELIABILITY AUTHORITY information through the NERC SDX? They have to supply data to their Reliability Authority through a secure network.</p>
038		R3	<p>The RELIABILITY AUTHORITY shall be able to utilize all resources, including load shedding, in addressing a potential or actual IROL violation.</p> <p>Policy 9 E - Current-Day Operations States that all resources, including load shedding shall be available to the Reliability Authority. The meaning changes when you say “shall be able to utilize” as opposed to “shall be available to”.</p>
		R7	<p>Only the INTERCONNECTION TIME MONITOR shall be able to issue a modified scheduled Interconnection frequency to implement a time error correction, and only a RELIABILITY AUTHORITY can be the Interconnection Time Monitor.</p> <p>Is this new? I cannot find anything that translates to this.</p> <p>Policy 1 D intro The Operating Reliability Subcommittee shall designate, on February 1st of each year, a RELIABILITY COORDINATOR to act as the Interconnection Time Monitor to monitor time error for each of the INTERCONNECTIONS and to issue time error correction orders.</p>
		R17	<p>The RELIABILITY AUTHORITY shall issue directives in a clear, concise, definitive manner. The RELIABILITY AUTHORITY shall receive a response from the person receiving the directive that repeats the information given.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			<p>The RELIABILITY AUTHORITY shall acknowledge the statement as correct or repeat the original statement to resolve misunderstandings.</p> <p>Comments: This requirement is identical to one in Standard 029 and should be deleted in Version 0. Disagree with comments.</p>
039		R7	<p>The TRANSMISSION OPERATOR experiencing a potential or actual SOL violation on the transmission system within its AREA shall, at its discretion, select from either a “local” (Regional, Interregional, or subregional) transmission loading relief procedure or may request it’s RELIABILITY AUTHORITY to issue an INTERCONNECTION-wide procedure.</p> <p>P9T2 Compliance Assessment Notes 1.1 Selecting transmission loading relief procedure. The RELIABILITY COORDINATOR experiencing a potential or actual SOL or IROL violation on the transmission system within its RELIABILITY COORDINATOR AREA shall, at its discretion, select from either a “local” (Regional, Interregional, or subregional) transmission loading relief procedure or an INTERCONNECTION-wide procedure, such as those listed in Appendix 9C1, 9C2, or 9C3 Changing from Reliability Coordinator to Transmission Operator changes the requirement rather than translating it.</p>
		Levels of non compliance	<p>Complying with interchange policies. During the implementation of relief procedures, and up to the point that emergency action is necessary, RELIABILITY AUTHORITIES and operating entities shall comply with the Interchange Scheduling Standards. Operating entities should be specified.</p>
040		R1	<p>The RELIABILITY AUTHORITY shall be aware of the restoration plan of each TRANSMISSION OPERATOR in its RELIABILITY AUTHORITY AREA in accordance with NERC and regional requirements. Comments: This requirement is redundant with Standard 027. Disagree with comments, this requirement is not stated in standard 027.</p>
051	Sections 1-4		Standards I.A specified the system performance criteria (Table I) required to be met for planning the system.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
	<p>Standard Applicability</p> <p>Corrective Plan and Levels of non-compliance.</p>		<p>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.</p> <p>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.</p> <p>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 assessment report or not. MH believes that it should be a separate document, and addressed as such in the compliance section.</p>
067		Purpose	<p>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.</p> <p>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.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Manitoba Hydro has the following additional comments:

The purpose statements were for the most part the first requirement restated. They should be rewritten to show the actual purpose of the standard.

There are many areas that were not translated in the policies.

The existing document references were poor, it appears the translation groups were working off different documentation.

Each Requirement in the Version 0 Planning Standards should have a corresponding Measure to ensure that each Requirement is met and facilitate the task of the compliance monitoring groups. Measures should be included for each Standard in the next posting of these Version 0 Standards for review by the industry.

The volume of material submitted by NERC to the industry was quite large and it was impossible to do a thorough and complete review in the 30 days allocated in a a period of the year when many key staff were away on vacation. Since this is a critical exercise for the industry, NERC should take into account the amount of material to review and provide adequate time to ensure that all industry participants can review the documents and provide constructive and thorough comments. The credibility of the process is at stake.

MH has only provided comment on planning standard 051 due to time restrictions. MH will comment in detail on 051 and the remaining planning standards in the next posting.

Many Requirement sections in the marked up operating policies have no comment attached to them It is therefore difficult to determine if or where these requirements were covered in the Version 0 documents. A more complete Mapping/Commenting exercise is required to give reviewers confidence that the translation is complete and accurate.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

We have significant concerns about the Planning standards included in version 0 which were part of Phases 3 and 4 earlier. While we support these standards in concept, the phase 4 standards should be field tested similar to the Phase 1 and 2 standards for requirements, and measurements. We also propose that the changes identified during field testing of standards included in phase 3 should be incorporated in the version 0 standards. Similarly the Vegetation Management Standard should be field tested also.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Yes. See comments to Question No.1.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Elimination of redundancies will make the Standards more clear in terms of responsibilities, requirements, and compliance. This is essential as we move away from the old industry structure to the NERC Reliability Functional model.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

We agree with the drafting team that none of the Planning Standards should be considered as business practices in Version 0.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

From the text above, we cannot tell which standards were field tested, but no changes were made following the field test. Also, which standards needed only minor changes and which ones needed significant changes?

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

We have recommended to delete most of these standards as that is the only alternative option offered to keeping them. We would propose to keep these Phase 4 standards and follow the same process as Phase 1 and Phase 2 of field testing and then including changes, if needed to remove ambiguity, before putting them at the same level of compliance as the other standards.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
51	1,2,3,4	R1-1,R2-1, R3-1, and R4-1	"Projected firm transfers" need to be defined so that a clear understanding exists of what is to be modeled.
53	1	R1-1	The Transmission Operator should be included along with Transmission Owner as applicable entity.
60	1	R1-1	Why is the Generator Owner included in here?
62	2		Refers to NERC SDDWG. Does this group exist or merged within MMWG?
57	2	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
63			<p>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.</p>
65			<p>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.</p>
67			<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.</p>
68			<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.</p>
69			<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.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Some of the guides included with original Planning Standards should be kept with the version 0 standards.

**COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards**

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Committer Information					
Name:		MAPP Planning Standards Development Working Group			
Organization:		MAPP (Part 1 – Comments on Translated Planning Standards)			
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input checked="" type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments		Group Name: MAPP Planning Standards Development Working Group			
Lead Contact	Tom Mielnik	Organization:	MAPP		
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Member Names	Organization	Segment	Member Names	Organization	Segment
Tom Mielnik	MEC	2	Delyn Helm	GRE	2
David Jacobson	MH	2	Dean Schiro	XEL	2
Jason Weiers	OTP	2			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

MAPP would not approve the planning standards as they appear today; but would approve the planning standards assuming acceptable improvements are made in response to our comments.

MAPP commends the Version 0 Drafting Team on producing a reasonably faithful translation of the NERC Planning Standards including Compliance Templates into the Version 0 Standards, and incorporating NERC Functional Model nomenclature while under extraordinary schedule pressures. Unfortunately, the time frame that the Drafting Team was faced with for producing this first draft was not conducive for producing a fool-proof set of documents. We urge NERC to consider additional time for review, comment, and clean-up of the Version 0 Standards before balloting the standards.

MAPP believes that one problem with the translation is the use of compliance templates for the planning standards which were adopted at different times. As a result, there are inconsistencies between standards and even within sections of standards. This is particularly noticeable in areas that are easy to compare, such as levels of noncompliance. For example, compare the levels of non-compliance of Section 3 of Standard 068 with the levels of non-compliance of the other sections of Standard 068. Section 3 provides that if a technical assessment did not address one of the requirements or was not provided it received a Level 4 Non Compliance; while in other sections there is a gradation of the levels of non compliance. In Section 5 of Standard 068, if the analysis is incomplete, the level of non compliance is listed as Level 1, while not providing the analysis is Level 4. This is because Section 3 is using a Compliance Template dated April, 2004, while Section 5 is using a Compliance Template dated October 9, 2000. Therefore, MAPP urges the Drafting Team to review each standard as a whole for the purpose of improving the consistency from section to section.

MAPP does not agree with the Drafting Team's approach of deleting the Planning Standard language from each section as being redundant to the more precise Compliance Template language. In some cases, the Standard language provides a better description of the overall direction and purpose of the Standard-writing that has resulted in the Compliance Templates. For example, Standard 051 deletes the old Standard S1 that provided a strong statement that "The interconnected transmission systems shall be planned, designed, and constructed such that...." with a weaker purpose statement that "System

simulations and associated assessments are required....". The weaker purpose is technically consistent with the Compliance Templates but leaves out so much of the big picture purpose for which the whole standard was written. If the current Compliance Templates do not accomplish all of the big picture yet, it is certainly lost by deleting it altogether before further work can be done.

Also note that given the time frame there are a number of minor errors in the Planning Standards that typically are not present in NERC Standards offered for comment. For example, in Standard 058, "quadrature" is misspelled as "quadrate". MAPP asks the Drafting Team to extend the Team's review in the next draft round to allow the Team to correct these minor errors.

There is numerous references to the Regional Reliability Council in the Version 0 Planning Standards but no reference to the Regional Reliability Organization. The Drafting Team should clarify the role of the RRO with regard to the Version 0 standards.

In summary, MAPP cannot support the Planning Standards that are provided in Version 0 as presented as being standards that are ready for compliance; however, MAPP would support Planning Standards conditioned on acceptable changes being made to resolve our comments. MAPP would support an effort to further clean the draft standards with an extra round of comments prior to ballot, and/or, adopting a trial use or best practices classification for certain standards that need more clean-up, field testing, or commenting prior to compliance.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

MAPP does not support adoption for compliance of Phase IV non-field tested Planning Standards that have not gone through the SAR process or Phase III field-tested standards in which significant feedback from the field testing is not incorporated in the planning standards. Significant comments received during field testing Phase III Compliance Templates should be incorporated into the Version 0 Phase III Standards prior to adopting these Phase III Standards for

compliance. Also, Version 0 Phase IV Planning Standards should either be field tested and revised or else be fully discussed and voted on through the SAR process before adopting these standards for compliance.

In particular, MAPP is concerned with the extraordinary cost and effort that would be required if Sections 3 through 6 of Standard 059 for generation testing is adopted for compliance. Further, MAPP is concerned that such testing has the possibility of causing generating unit damage under certain circumstances for certain facilities. MAPP urges the Drafting Team or NERC to pick out a few key 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. The transition period would allow for scheduling for outages for testing in such a way that system reliability would not be degraded.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

While MAPP believes it is a reasonable translation, MAPP is concerned about the translation of the Planning Standards as indicated in our response to Question 1. For example, the translation is based upon using different vintages of Compliance Templates resulting in standards that are somewhat uneven and inconsistent.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

MAPP does not completely support either of these statements for the Planning Standards.

MAPP believes that the Drafting Team has already eliminated some redundancies in the Planning Standards that should not have been eliminated. As indicated in our response to Question 1, MAPP believes that in some cases the Standard

language should be added back to the Version 0 standards. In these cases, the Standard language typically provides a broader view of the purpose of the standard than is provided by the Compliance Templates. When there are clear cases of exact redundancies, MAPP supports eliminating the redundancies when nothing is lost with the elimination.

On the other hand, MAPP does not support minimizing change to the Planning Standards merely to simplify the process. As we indicated in our response to Question 1, we believe the Drafting Team should make an attempt to clean-up some inconsistencies within the standards particularly with regard to Non Compliance Levels and with regard to terms from the NERC Functional Model.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

MAPP believes that the designation of functions from the NERC Functional Model as used in the Version 0 Planning Standards are for the most part acceptable. However, since there are several Planning Standards which require a significant effort to clean-up the functional designations, MAPP urges the Drafting Team to fix these inconsistencies before putting the Version 0 standards up for balloting.

Also, there are numerous references to the Regional Reliability Council in the Version 0 Planning Standards but no reference to the Regional Reliability Organization. The Drafting Team should clarify the role of the RRO with regard to the Version 0 Standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

MAPP notes that the SAR process for Standard 600 Facility Ratings, System Operating Limits, and Transfer Capabilities has resulted in standards associated with ATC component calculations as being classified as business practices. If the Drafting Team would wish to be consistent with this approach, the Drafting Team

should classify the portions of Standards 054, 055, and 056 which deal with ATC components, CBM, and TRM calculations as business practices. The portions of these standards which deal with the TTC and the reliability portion of TRM should continue as reliability standards.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

MAPP does not agree with the Drafting Team's approach because some of the existing Reliability Coordinators will continue to not have all the tasks of the Reliability Authority. The Version 0 Standards must reflect the continuing presence of Reliability Coordinators in the industry until such time as the industry changes and the Reliability Coordinator Function is eliminated.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

MAPP does not support adoption for compliance of field-tested Planning Standards in which significant feedback from the field testing is not incorporated in the standards. Significant comments received during field testing of Phase III Compliance Templates should be incorporated into the Version 0 standards prior

to adopting the standards for compliance. Therefore, MAPP urges that the Phase III non-revised Planning Standards be adopted on a non-compliance trial use or best practices basis.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

MAPP does not support adoption for compliance of non-field tested Planning Standards that have not gone through the SAR process. Version 0 Phase IV Planning Standards should either be field tested and revised or else be fully discussed and voted on through the SAR process before compliance. Therefore, MAPP urges that the non-field tested Phase IV Planning Standards be adopted on a non-compliance trial use or best practices basis.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	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"
051	1	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".
051	3	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".
051	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	3	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.
052	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."
053	1,2	R3, R4, R5, R6	<p>Good translation of existing standards to Version 0. Changes to language have made standard more clear.</p> <p>This standard should be kept.</p> <p>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.</p>
054	Purpose		Delete "and uniform" and replace "among transmission system users" with "by Transmission Service Providers and Transmission Owners". Consistent application not uniform application is what is needed. Non-uniformity may be needed to provide good TTC and ATC. Calculations are made by TSPs and TOs. This standard applies to them.
055	2	R2-1	List item (C) refers to "ATC" and else where acronyms have been spelled out. Suggest expand "ATC" to Available Transfer Capability.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
055	2	R2-1	List item (D) refers to "Regions". Suggest changing to Regional Reliability Council to match rest of document.
055	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.
055	heading	applicability	The applicability section in the main title should also include the Transmission Service Provider as section 3 and 4 refers to such.
055	3	M3-2	Replace "Regions" with Regional Reliability Council.
055	3	compliance monitoring process	Replace "Regions" with Regional Reliability Council.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
055	4	R4-2	Replace "Regions" with Regional Reliability Council.
055	4	M4-1	Replace "Regions" with Regional Reliability Council.
055	4	M4-2	Remove errand "." in the measure title.
056	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."
057	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
057	2	R2-1	The word "Regional" should be replaced with "Regional Reliability Council" in order to fit with the NERC functional model.
057	2	M1	It seems that M1 should be renamed as "M2-1" to conform to the rest of the Version 0 Standards.
057	2	M2	It seems that M2 should be renamed as "M2-2" to conform to the rest of the Version 0 Standards.
057	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.
057	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"?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
057	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 reporting requirements.
057	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.
057	5	Levels of Non-Compliance	The levels of Non-compliance need to be transferred to the new Version 0 Standards.
058	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."
058	Standard Applicability		Existing Document Language for M5 and M6. Replace "Regions" with "Regional Reliability Councils."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
058	Standard Applicability and Applicability Sections in each Section		Not all of these Functions accurately reflect the NERC Functional Model. Replace "Transmission System Owners" with "Transmission Owners" and "Generation Owners" with "Generator Owners".
058	All	All	Add a clause to reflect the need to protect the confidentiality of data. Refer to FERC Critical Energy Infrastructure Information provisions.
058	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.
058	Section 2	Compliance Monitoring	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.
058	All	Compliance Monitoring Process	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
058	Section 4	R4-1	In 2., replace "quadrate" with "quadrature" and "reactance's" with "reactances". In 3. , add common abbreviations back including SVC, HVDC, STATCOM, and FACTS.
058	Section 5	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.
058	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.
059	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

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
060	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.
060	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.
060	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.
060	2	R2-1	The word "Transmission owner" should be capitalized to "Transmission Owner" to properly be identified within the NERC functional model.
060	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	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".
061	Section 3	Levels of Compliance	Resolve what the Levels of Non Compliance should be so that this standard is complete.
067	1	R1-1	List item 4 refers to "Regional". Change to "Regional Reliability Council" to match rest of document.
067	2	R2-1	Replace "RRC" with "Regional Reliability Council" to be consistent with rest of document.
067			The original standard III.D. also included Guides. These should be carried over into Version 0.F

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	Section 4	Levels of Compliance	Replace "Region" with "Regional Reliability Council".
061	Section 7	R7-1	Replace "...Resource Planner shall be made known its amount..." with "...Resource Planner shall make known its amount..."
063			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.
063	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.
064	1	R1-3	R1-3 is redundant, it does not contain any thing different that what is in R1-1.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	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.
065	1	R1-3	Whose procedures are being referenced here? R1-2 should begin as "The Transmission Operator's procedures".
065	1	R1-2	Whose procedures are being referenced here? R1-2 should begin as "The Transmission Operator's procedures".
065	2	M2-1	The last part of the sentence (phrase "to be reviewed to verify compliance with this Reliability Standard") can be deleted.
065	5	M5-1	The term "Transmission Owner" should be "Transmission Operator" to align with R5-1 within 065.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	5	M5-2	The term "Transmission Owner" should be "Transmission Operator" to align with R5-1 within 065.
065	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>
065	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.
065	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	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.
065	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.
065	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.
065	9	M9-1	Item (b) would read better as "That confirms the proper coordination of boiler or nuclear reactor control..".
065	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	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?
065	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?
065	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?
065	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?
065	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	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.
065	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.
065	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?
065	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.
065	11	R11-2	The phrase "of all misoperations" should be added after "corrective actions" to clarify what documentation is needed by the Generator Operators.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	11	M11-1	M11-1 contains a reference to standard 069 instead of 065 of which this Measure is a part of.
065	11	M11-2	M11-2 contains a reference to standard 069 instead of 065 of which this Measure is a part of.
065	12	M12-2	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.
066	Standard Applicability		Listed as "Transmission Owners". Yet Applicability varies by section. Add "Planning Authority", "Transmission Planner", "Regional Reliability Council", and "Transmission Operator".
066	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
066	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.
068	1, 3-5	R1, R3-R5	<p>Approval dates of M1, M2, and M5 are October 9, 2000 not 2004.</p> <p>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</p>
068	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.
068	3		Section 3: The Level 4 compliance requirements should have "the technical assessment provided but not complete language" moved to Level 1.
069	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 should be retained in the standard.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	1	M1-1	Believe Reliability Standard # should be 064R1-1.
069	2	M2-1	At the end say "... as defined in section 2 R2 of the Reliability Standard." instead of "... section 2 R1 ..."
069	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", or "have evidence of" similar to other measures.
069	5	R5-1	Change 3rd line to "... shall analyse it's Special Protection System misoperations in accordance with ..."
069	1	R1-1 3)	Last line says "1, 2, 3 and 3 of ..." should say "1, 2, 3, and 4 of ..."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
070	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.
070	1	R1-1	The phrase "as appropriate" is repeated. The second phrase should be deleted.
070	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.
070	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.
070	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
070	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.
070	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.
070	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.
070	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.
070	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
070	4	R4-1	"Generator Operator" should be expanded to include "Generator Operator or Generator Owner".
071	1	R1-2	Applicable NERC Standards should be changed to the specific NERC standards. Level 1: Reliability Standard 071-R1-1 number 4 is quoted. "Number 4" should be deleted. Level 3: "as defined above in Reliability Standard 071-M1-1" should be deleted
071	1-4	R1-R4	Where automatic load restoration programs are in use to minimize restoration times, the requirements of this standard should be met. Therefore, suggest keeping these standards in Version 0.
071	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.
072	1	R1-1	Suggest changing "transmission owner" to "Transmission Owner"

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
072	1	compliance	Several places "Region" is used. Suggest replacing with "Regional Reliability Council"
072	1	levels	Suggest replacing "transmission owner" with "Transmission Owner" in the two places this occurs

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

MAPP believes that each Requirement in the Version 0 Planning Standards should have a corresponding Measure to prove that each of the Requirements is met. MAPP urges the Drafting Team to revise the translation to provide for a Measure for each Requirement.

MAPP urges that NERC provide for a transition period for compliance with the Phase 3 and Phase 4 standards. In some cases these standards would result in unreasonable hardship if immediate compliance was required.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

This first draft has too many incomplete sections, e.g. measures, levels of non compliance and compliance monitoring process. These must be posted for comment before conditional approval would be reasonable to expect.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

See comments for question 1.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Conditionally agree that what has been done so far is a reasonable translation of the Operating Policies. However there the translation has uncompleted sections, improvements per comments need to be made and there has not been sufficient time to make a sufficient review.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Minimizing redundancies is an important goal. However the drafting team should only attempt this where it can be accomplished without major reorganization and within the short time available. Major reorganization also takes considerable time and effort for the industry to review.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Generally acceptable, however, some requirements are applicable to Regional Reliability Councils which is not functionally identified in the Functional Model.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No comment at this time.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

No comment at this time.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

See file with MAPP PSDWG comments.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

See file with MAPP PSDWG comments.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R3	This appears to be detail for how to measure R1 and R2 when there is overlapping service. If this remains a requirement, a specific measure must be included so the requirement can be measured and enforced.
001		R4	This appears to be a detail on which BA's fall under R1 and R2. Either include this in R1 and R2 or develop a measure so the requirement can be measured and enforced.
001		M1	The formula on the 5th line has CPR1 instead of CPM1.
001		M2	The first formula in the measure has CPS2 instead of CPM2.
001		Compliance monitoring process	The statement on the reset period seems quite stringent. If you need to go a full calendar month without a violation (defined as a Violation clock-ten minute) it would be almost impossible to reset. A more reasonable reset would be in compliance for a calendar month.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R1	There is no measurement for this requirement. If this remains a requirement, a measure must be included to measure the requirement.
002		R2	There is no measurement for this requirement. If this remains a requirement, a measure must be included to measure the requirement. The requirement should state a minimum performance level that must be met by the reserve levels and mix of Operating Reserve - Spinning and Operating Reserve - Supplemental.
002		R3	There appear to be two requirements here. First the requirement to deploy contingency reserves. Second the requirement to review the amount of reserves to be carried. They should be split. There is no measurement included for review of the contingencies on an annual basis and there should be.
002		R6 Compliance Monitoring Process	There is no measurement for this requirement. If this remains a requirement, a measure must be included to measure the requirement. The Compliance monitoring process references the NERC Performance Standard Training Document. The details of the Standard training document that are necessary for compliance monitoring should be included in the standard.
002		M1	The first graph in this measurement has 10 min. as the recovery time. This should be generic as in the second graph. The second paragraph of the Determination of AceM or Acem is incomplete and redundant. It should be removed. The last sentence in this measurement is incomplete.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		Levels of Non-Compliance	Level 1 non-compliance should end with "95%". It is missing.
002		Reset Period	The reset period should be one calendar quarter without a violation on a reportable disturbance.
003		R1	There is no measurement for this requirement. If this remains a requirement, a measure must be included to measure the requirement. The section in R2 dealing with calculation of the Bias should be in R1.
003		R2	There is no measurement for this requirement. If this remains a requirement, a measure must be included to measure the requirement. The criteria for Tie Line Bias Control is only the method to calculate frequency bias. This portion should be included in R1 and not in R2. If there are criteria for Tie Line Bias Control they need to be added.
003		R3, R4, R5	There are no measurements for these requirements. Measures must be included for these requirements

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
003 004 005 006		R4 R1 R1-R15 R1-R4	There are no measurements for these requirements. Measures must be included for these requirements
006		R5 Compliance Monitoring Process	This requirement is more a process of how to resolve disputes than a requirement that must be met. There is also no measure for this requirement. If this remains a requirement, a measure must be included of measure the requirement. The compliance monitoring process includes requirements, i.e. dates by which action must be taken. These should be included in the requirements section.
006		Levels of Non-compliance	The only non-compliance is related to providing a report and does not support the purpose “to ensure that, over the long term, the BALANCING AUTHORITY AREAS do not excessively depend on other BALANCING AUTHORITY AREAS in the INTERCONNECTION for meeting their demand or INTERCHANGE obligations.” There should be different levels of non-compliance included instead of just being "non-compliant".
008		Measures	"Control Area Operator" should be replaced by "Balancing Authority"
010-013 010		Measures	It appears that Policy 3 A Requirement 1.1, which is identified in the marked up file as reliability, did not get translated into Version 0 Reliability Standards. There is no measure for the requirements applied to the Purchasing-Selling Entity in R1 and R4.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		R1	"Security Analysis Services" is not a Functional Model entity - entity responsible for this process needs to be identified.
012		R1 R2 R3	Incorrect existing document reference: "Policy 3C Requirement 3.4" should be "Policy 3B 4.1.3" Incorrect existing document reference: "Policy 3B Requirement 4.1.3" should be "Policy 3B Requirement 1" Incorrect existing document reference: "Policy 3B Requirement 1" should be "Policy 3A Requirement 6"
013		R1	This attempt at condensing the original policy wording has resulted in responsibility of entities becoming potentially unclear. For example, more than one entity may assume they have responsibility for setting the limit for a given situation or no one may assume responsibility.
013		R1	The concept that modifications "may be made only due to TLR events (or other regional congestion management practices), Loss of Generation, or Loss of Load." in Policy 3D Requirement 2 did not get translated into Version 0.
013		R2	Appears to disagree with Policy 3D Requirement 2.3 which is applicable to the Source BA. If this is not the case, the this requirement on the Source BA did not get translated into Version 0.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		R3	Using the words "release the limit" does not include the situation where partial reloading is required.
014		R4	Comment to the question in the comments section - Load forecasting is an important aspect of reliability to insure adequate resources are available.
015		R4	The word "and" should be removed in the second sentence prior to the word "shall". Also in the second sentence, the reference to Addendum A should be a reference to Attachment 1.
015		Levels of Non Compliance Level 1 and Level 4R5	Operating Authority should be changed to BALANCING AUTHORITY and TRANSMISSION OPERATOR and Reliability Coordinator should be changed to RELIABILITY AUTHORITY. In Level 4, RC's should be changed to RA's.
015		Attachment 1 - Electric System Security Data	In the first sentence, the reference to Policy 4B, "System Coordination - Operational Security Information." should actually be a reference to Standard 015, "Operational Reliability Information."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
015		Applicability	By not listing the GENERATOR OPERATORS in this section, does this assume that all real time generator data is being supplied by the BALANCING AUTHORITY?
016		Purpose Applicability	GENERATOR OPERATOR should also be listed in this section. The four entities listed should be in capital letters.
016		R1	The phrase at the end of the first sentence " or to neighboring BALANCING AUTHORITIES and TRANSMISSION OPERATORS." should be changed to "and to neighboring BALANCING AUTHORITIES and TRANSMISSION OPERATORS."
016		R2 - Existing Document References	This requirement actually references Policy 4C - Requirement 2.
016		Compliance Monitoring Process	"Operating Authority" specified under Periodic Review needs to be changed to "GENERATOR OPERATORS and TRANSMISSION OPERATORS." "Reliability Coordinator" should also be changed to "RELIABILITY AUTHORITY" in this section. Also, "Control Areas" in these section needs to be replaced with "BALANCING AUTHORITIES and TRANSMISSION OPERATORS."

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
016		Levels of Non Compliance	Level 1 - "BALANCING AREAS" should be "BALANCING AUTHORITIES."
017		Standard	Policy Reference should be Policy 4 - System Coordination Section D, not B.
018		Purpose	Change "all reliability entites" to "all entities" since this also applies to operating functions of the functional model. Also, delete the last sentence refering to policy 5.
		Applicability	Reliability Coordinators were excluded from Policy 5A but is is correct to include Reliabilty Authorities here.
018		R5	Generator Operators should be added to the list rendering all available assistance.
		R6	Captialize defined entites, e.g. RELAIBILITY AUTHORITIES
		In General	How are requirements 3 & 7 of Policy 5A addressed?
019			Consider including Distribution Providers and LSEs since communicaitons are required for laod shedding.
024		Purpose	Change "is to" to "shall" to be consistent with language contained in the Policy.
		Applicability	Change "GENERATION OPERATOR" to "GENERATOR OPERATOR" to be consistent with NERC functional model language.
024		R18	Please reference requirements "15-17 above" rather than "1-17 above" to be consistent with language of Policy 6A, Requirement 6.
R25		Purpose	Change "needs to" and "need to" to "shall" to be consistent with language contained in the Policy.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R4	<p>Consider rewording for consistency/clarity. Example: Each RELIABILITY AUTHORITY, TRANSMISSION OPERATOR, AND BALANCING AUTHORITY shall develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans shall address the following:</p> <ul style="list-style-type: none"> - Insufficient Generating Capacity - Transmission Load Shedding
028		Purpose R1	<p>Correct typo -"reliability entity needs to AUTHORITIES"</p> <p>Requirement bullet items 8 and 9 appear to incorrectly reference P6T2 (restoration plan) requirements not P6T3.</p> <p>Also, "Existing Document References" column should reference P6T3 (not P6T2).</p>
028		Measures Compliance Monitoring Process	<p>"Existing Document References" column should reference P6T3 (not P6T2).</p> <p>Self-Certification: "...the following criteria have been met;" appears to reference requirements 5, 6, and 7 from P6T2. Shouldn't it reference requirements 5, 6 and 7 from P6T3.</p> <p>Also, shouldn't the reset period be consistent with P6T3 rather than P6T2.</p>
028		Levels of Non Compliance	<p>This appears to be referencing P6T2 language. Shouldn't this use P6T3 levels of Non Compliance.</p>
033 035-040		Purpose R2 Purpose	<p>Change "must" to "shall" after the first RELIABILITY AUTHORITIES term to be consistent with language contained in the Policy</p> <p>Add in Existing Document Reference Column "Policy 9A, Requirement 4" as that is the source of this particular item</p> <p>Change "must" to "shall" after the first RELIABILITY AUTHORITIES term to be consistent with language contained in the Policy</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

To much material to do a proper review in 30 days. The comment form was hard to work with - the comment table cells should expand to accept more comments if necessary for a given Reliability Standard.

It appears that some requirements which have been identified as potential Business Practice Standards have not been included in NERC Version 0. Will NAESB develop there and when?

The SDT did an amirable job to translate the Operating Policies in the short time available to the extent this was achieved.

Many requirement sections in the marked up operating policies have no comment. It is therefore difficult to determine if or where these requirements were covered in the Version 0 Reliability Standards. A more complete Mapping/Commenting is required to give reviewers confidence that the translation is complete and accurate.

The incomplete sections in the translated operating policies need to be completed by the next comment period.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Numerous planning measurements have known needed revisions to become defined sufficiently to be practically monitored (Phase 3). In addition, a number of other planning measurements have never been reviewed or field tested to eliminate ambiguities and are therefore not ready for compliance monitoring (Phase 4). Some planning measurements are more procedure/data oriented and not really "standard" material, but are in fact reference or source material for other true standards. A number of planning standards contained in this posting must be removed from Version 0 as suggested in the following comments before a yes vote could be considered. Operating standards were not considered by these commenters.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Numerous planning measurements have known needed revisions to become defined sufficiently to be practically monitored (Phase 3). In addition, a number of other planning measurements have never been reviewed or field tested to eliminate ambiguities and are therefore not ready for compliance monitoring (Phase 4). More specific comments are addressed in the following questions. Operating standards were not considered by these commenters.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Operating standards were not considered by these commenters.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Operating standards were not considered by these commenters.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Operating standards were not considered by these commenters.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Operating standards were not considered by these commenters.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Operating standards were not considered by these commenters.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

There are no recommendations for the planning standards.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Operating standards were not considered by these commenters.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Operating standards were not considered by these commenters.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
053	2		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051
055	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.
057	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
057	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
057	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

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
057	5		This section should not move forward in Version 0. Not well defined and/or detailed, needs further drafting for implementation
058	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
058	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
058	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
058	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

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
059			<p>This entire standard should not move forward in Version 0. The NERC CTF 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.</p>
060	2		<p>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</p>
061			<p>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.</p>
062			<p>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</p>
063	3		<p>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</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
064	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 implementation. Consideration should be given to incorporating this into STD 051 for added emphasis.
064	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.
065	2		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 065, Section 1.
065	4		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 065, Section 3.
065	6		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 065, Section 5.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
065	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.
065	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.
065	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.
065	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.
066			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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
067	4		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.
068	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.
068	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.
069	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.
069	3		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	4		This section should not move forward in Version 0 since it is essentially already covered by Version 0 STD 051.
069	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.
070	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.
070	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.
071			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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

The question is not clear. What is need for understanding the question is a description of the service agreements, including what is typically covered in the service agreements.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Standard # 64, existing Planning standards, D. Voltage Support and Reactive power, measure M2, might not be implementable under the FERC Standards of Conduct due to Transmission Owners having to share transmission information with their energy and/or marketing affiliates.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Below are a number of issues that need to be address as acceptable improvements.

Implementation plan and associated realistic time periods need to be developed prior to compliance monitoring and assessment; the Functional Model structure has not been fully incorporated at the industry level.

The NYISO agrees with the drafting team and believes phase III & IV should NOT be included in the Version 0 Standard. Additional work needs to be completed to in sure the compliance components are fully tested to ensure compliance assessments can be performed fairly and equitably.

Until the division of responsibilities between NAESB and NERC is very clear, topics such as: The Time Control Standard and Inadverent interchange standard requirement should be carried forward.

The Version 0 Standards, as they are presently written have not achieved the initial requirement of ensuring that they are clear, well defined measurable and crisp. Significant comments will need to be incorporated to meet this criteria.

The NYISO would suggest a review of the planning standards in reference to the existing Standards and the paragraphs associated with the Standard (S) definition. It seams in many cases the translation the words in the Standard (S) paragraph has been lost. The standards paragraph in the existing standards provided direction to the standards and summarized the intent.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

The NYISO believes that inclusion of the Phase III and IV Planning Templates/Measures that did not go through the complete NERC process of field testing-evaluation and revision and could therefore result in a broad rejection of the entire set of Version 0 Standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The NYISO believe that the Planning translation appears to be reasonable, with the exception of the loss of the S1, S2 etc. language however, the Operating Policy Translations need additional work to address the initial requirement of ensuring that they are clear, well defined, measurable and crisp. Significant comments would need to be incorporated to meet this criteria.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Where there are clear duplication of requirements, consolidation should occur. Where there are obvious inconsistencies, they should be resolved and redundancy removed, ONLY IF there is an exact duplication. Otherwise the redundancies should be left "as is". These will be addressed in the Version 1 Standards.

In the interest of time, duplications would be preferred over loss of content.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The NYISO has endorsed Version 2 of the Functional Model as acceptable but improvement is required to better describe certain functions or to eliminate misconception of responsibilities. NYISO has concerns with the application of the Functional Model without further clarifications in this area. Comments to this have been submitted by NPCC.

The application of the FM to the industry is of concern and the NYISO believes that an implementation plan along with associated timelines to allow the industry to achieve full compliance will be vital to the Standards.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

This question was somewhat unclear. The NYISO feels that sufficient detail should be provided in the Standard to identify the specific function responsible for the task. service agreements should not be left solely to define responsibilities, but may be used to identify functions.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The NYISO tentatively agrees to the potential business practice standards with the understanding that a further chance shall be given to elaborate/comment on these individual standards/requirements. .

The NYISO believes that this would be best targeted for future development(i.e. version 1)

There must be only one set of business practice rules and they must reside in one place. What is being proposed is that both NERC and NAESB will address the same business practices in what is being referred to as" Shadow mode" This is inappropriate and may lead to jurisdictional issues and potential for conflict.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

There may be additional requirements that should be reviewed following the Version 0 process.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

The NYISO agree that the RA is the highest authority and must have ultimate accountability. Splitting and delegating tasks among different organizations must be carefully coordinated so as not to pose any risks to reliability.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

NYISO believes that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented and would be better served going through the SAR process for the Version 1 standards. Inconsistencies

for compliance measuring may for the present, pose problems without further consideration. The NYISO therefore strongly suggests that Phase III Planning Standards NOT be included in the set of Version 0 Standards.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

The NYISO believes that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented and would be better served going through the SAR process for the Version 1 standards. Inconsistencies for compliance measuring may for the present, pose problems without further consideration. The NYISO therefore strongly suggests that Phase IV Planning Standards NOT be included in the set of Version 0 Standards.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
			The NYISO worked closely with NPCC CP-9 and supports thier comments. Issues observed by the NYISO have been included in the comments submitted by NPCC CP-9.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

More work is needed in this area.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		M1, M2	<p>M1: Typo in formula?: $CPR1 = (2 - CF) * 100\%$ Should be: $CPM1 = (2 - CF) * 100\%$</p> <p>M2: Typo in formula?: $CPS2 = [.....]$ Should be: $CPM2 = [.....]$</p>
002		R2	<p>The statement “The same portion of resource capacity (eg. Reserves from jointly owned generation) shall not be counted more than once as CONTINGENCY RESERVE by multiple BALANCING AUTHORITIES” should be moved to the middle of R1 because of its universal nature. R2 specifically deals with only reserve sharing groups. The jointly owned unit could be shared by entities that belong to different reserve sharing groups</p>
002		M1	<p>1. Part of the formula for R_i when $ACEA < 0$ is missing. 2. The 2 existing graphs should be replaced. They do not clearly demonstrate ACEA, ACEM and the recovery time. Graph #1 should be shown for 15 minutes. 3. Delete ACEM. DCS is not intended to cover Loss of Load events and to keep it causes confusion to readers. Levels of Non Compliance: missing value in definition of Level 1 “...or equal 95%.” Date Retention Requirement for ACEM should be deleted</p>
003		R1, R4	<p>R4 requires a BA to "have a monthly average Frequency Bias Setting that is at least 1% " of yearly peak demand does not permit BA who uses variable frequency bias to "closely matches" its system response in R1. Utility with variable freq. bias may misrepresent its freq. bias for a significant part of the year because a minimum bias based on yearly peak demand does not properly reflect the seasonal variations of its unit commitment.</p>
004			<p>Even if this standard is moved to standard 038, it:</p> <ol style="list-style-type: none"> Should have a provisional clause allowing the use of Automatic Time Error Correction as established by Regional Councils. Should define the bound for (Manual) Time Error Correction, or a provisional clause allowing regional councils to define it.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005			Will “Appendix 1A- ACE equation” be retained in some form? Some other standards in this Version 0 show attachments that were the appendices in the current Policies, but appendix 1A can not be found.
006			No comment.
007		R1, R2	R1: The MSSC should be clearly defined as the MSSC in the TRANSMISSION OPERATOR’s system. Wording could be simply changed from “the” MSSC to “its” MSSC. R3: The BALANCING AUTHORITIES should be included (along with RELIABILITY AUHORITIES and TRANSMISSION OPERATORS) in the process described in this requirement
008		R1	The Levels of Non-Compliance require clarification. For example, if a CAO or TO fails to inform the RC of an IROL or SOL and the limit violation is corrected within the 30 minutes, does this count as non-compliance and how will the level of non-compliance be determined?
009			No comment

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
010			No comment
011		R2	This check can be automated to check the tag Market Path Product with the Transmission Allocation Product but this will only verify that the two codes select are compatible, it will not confirm that the actual Transmission is of the selected product. This being the case and with no or very limited impact to system reliability for a non match this check is unnecessary. Firm Energy being curtailed because its on Non-Firm Transmission becomes a settlement issue between the Generating and Load DSEs
012			No comment
013			Agree with the comments as submitted in the original document.
014			Agree that the Generation Operator is responsible for providing up to date information on status of all generation reactive power sources to the Transmission Operator.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
015		R1	Reliability Authority may be charged with greater responsibility than PNSC presently has. RA will now monitor and operate the bulk interconnection vs assess operational security and reliable operation.
016		R1, R2	R1: Where does the reference to the 100 kV line/transformer and 50 MW generator come from? R2: Coordination for AVR and supplementary excitation control would be onerous to do because these have mainly local impact. Outage planning and scheduling coordination between RA, BA and TO for S/C, reactors, shunt/series capacitors should only be required with the affected area(s).
017			Functional hierarchy should be clarified so that the roles of the various entities do not overlap.
018			Functional hierarchy should be clarified so that the roles of the various entities do not overlap.
019			No comment

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020		R5	Is Attach 5C Attachment 1 to this standard?
021		R4	"Analysis to be conducted in all operating timeframes" suggest real time analytical operating tools. This be difficult for entities who are constrained by transient or voltage stability limits.
022		R1, R3	<p>Purpose: The list of entities entitled to information should include BALANCING AUTHORITIES.</p> <p>R1: Will the Regional reporting procedure eliminate the need of the old appendix 5F-Reporting requirement from NERC and DOE?</p> <p>R3: The duty to report seems vague. Is it a shared duty between the affected RAs, BAs, and TOs? Which of the entities should assume the lead role? The concluding role?</p>
023			No comment
024			No comment

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025			No comment
026		R1	R1 is redundant and should be removed. Agree that the standard should be relocated from the Operations planning to standards focusing on emergency operations. The last part of Standard 26 appears to be missing from the document.
027		R4	R4 indicates that priority should be for the restoration of the interconnection. In some situation, it might be more appropriate to consider the restoration of the control area before the interconnection as the priority.
028			The purpose should be rewritten (remove “needs to authorities”) to make sense (looks like typo).
029			No comment

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
030			No comment
031			No measures, regional differences, compliance monitoring process or levels of non-compliance were listed. It seems like a page is missing in the document. The requirement in this item also refers to an attachment 1, but there are more than one attachment 1 in this document. Better referencing to attachment and better numbering of attachments is required.
032			No comment
033			Much of Reliability Authority language in this section is practiced by BCTC CA Operators within our CA even though we are not a "Reliability Authority".
034			No comment

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
035			No comment
036			No comment
037			Much of Reliability Authority language in this section is practiced by BCTC CA Operators within our CA even though we are not a "Reliability Authority".
038			Much of Reliability Authority language in this section is practiced by BCTC CA Operators within our CA even though we are not a "Reliability Authority". No measures were specified even though there are 19 requirements. Seems odd not to measure such a large item.
039			Much of Reliability Authority language in this section is practiced by BCTC CA Operators within our CA even though we are not a "Reliability Authority".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
040			Parts of this section is also covered in Item 27 (Restoration) and only the parts for Reliability Authorities coordinating between Interconnections need to be maintained or maybe this whole section can be deleted. No measures were specified.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
52			The proposed standard (52) appears to be consistent with the previous standards and we have no comments.
61			The proposed standard (61) appears to be consistent with the previous standards and we have no comments.
63	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.
63	2 & 3		Continued from above since comment was overflowing box and I could not see what was typed. 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.
63	3		M3-1 has extra words in the Measures box. It appears the words "has a system" should be deleted.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
69	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.
69	3		Level 1 in the Levels of noncompliance is missing the 1. It just says Level
69	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

See Progress Energy response to Question 13 below, otherwise this is a reasonable transition of the NERC Planning Standards from the original to a new format.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

See response to Questions 12 and 13.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Version 0 is a reasonable translation of the current version NERC Planning Standards (also see Question 13). With regard to the reference to "obligation", the NERC Planning Standards were developed along with an Implementation Plan designed to openly address industry feedback prior to full implementation of a standard including commenting and field testing.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

See Questions 12 and 13.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

See Question 13 for translation for Version 0 with respect to Planning Standards. Also, see Progress Energy's response submitted separately for operation policies.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Comments here focus on planning. See Progress Energy's comments on operation policies submitted separately.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Comments here focus on planning. See Progress Energy's comments on operation policies submitted separately.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The functional model creates error precursors with respect to communications and timely actions required in power system emergency scenarios and thus we cannot support implementation of the functional model in part or in whole.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Comments here focus on planning. See Progress Energy's comments on operation policies submitted separately.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

These standards were field tested and many comments followed the field testing. It is acceptable that these standards be included. Modifications to accommodate those industry comments, as well as any others, can be made in later revisions of this Version 0.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

NERC posted the following 2 bullets on its web-site in May of 2002:

- **Further development of the Phase IV Planning Standards will occur through the Organization Standards Process at some future date. Reviews for compliance to these Standards, while approved by the Board in 1997, will not be conducted until these Standards have gone thru the new Organization Standards Process.**
- **Further development of the Phase IV Planning Standards will occur through the Organization Standards Process at some future date. Reviews for compliance to these Standards, while approved by the Board in 1997, will not be conducted until these Standards have gone thru the new Organization Standards Process.**

Version 0 should exclude those Planning Standards NERC classified as Phase IV due to industry concerns and the lack of the Due Process that was afforded other standards. Doing so, Version 0, with respect to Planning Standards, will be closer to "implementation ready". PEC would support future standards that promote good dynamic modeling.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	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”.
051	1	M1-1 and M1-2	Evidence for assessments and corrective plans should be provided by the Planning Authority, not the Transmission Planner
051	2	R2-2	Wording is not consistent with R1-2. See comment for R1-2.
051	2	M2-1 and M2-2	Evidence for assessments and corrective plans should be provided by the Planning Authority, not the Transmission Planner
051	3	R3-2	Wording is not consistent with R1-2. See comment for R1-2.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	3	M3-1 and M3-2	Evidence for assessments and corrective plans should be provided by the Planning Authority, not the Transmission Planner
051	4	M4-1 and M4-2	Evidence for assessments and documentation should be provided by the Planning Authority, not the Transmission Planner
057		Standard Applicability	Applicability for Section 5 was omitted
058	6	R6-1	Incorrect reference of Standard II.A.M5. Needs to be updated to new Standard number
061	1	Levels of Non Compliance	“the entities responsible for the reliability of the interconnected systems” should be changed to the Planning Authority.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	3		Has this section been dropped?
064			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.
065	6	Levels of Non Compliance	Incorrect reference of Requirement IIIC.S2.Section C.R1. Needs to be updated to new Standard number
065	11	R11-1	Incorrect reference of Requirement III.C.S6.Section A.R1. Needs to be updated to new Standard number

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization: The PSEG Companies					
Telephone: (
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC					
<input type="checkbox"/> Not Applicable					
Group Comments Group Name: The PSEG Companies					
Lead Contact Jeff Mueller		Organization: The PSEG Companies			
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Jeff Mueller	PSEG Services	3			
Colin Loxley	PSE&G	1			
Jim Hebson	PSEG ER&T	6			
Tom Piascik	PSEG Power	5			
Bob Snow	PSE&G	1			
		2			
		2			
		2			
		2			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The PSEG Companies could approve the standards package in its entirety, if and only if:

- Untested Phase III and the entire Phase IV Planning Standards were not to be included in the Version 0 standards**
- Questions regarding compliance enforcement issues are adequately addresses. Will financial penalties be waived on Version 0 Standards? What is the role of the Regional Council in compliance and enforcement?**
- Inconsistencies in the levels of compliance need to be addressed. Some are based on potential; impacts on reliability while others are based on more direct impacts.**
- Inclusion of a statement in the final Version 0 document that passage of the Version 0 requirements does not necessarily represent the Industry's Consensus or approval of each and every one of those requirements**

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Yes. Inclusion of the Untested Phase III and the entire package of Phase IV Planning Standards in the Version 0 Standards. Requirements for Generator testing have the potential to be a 'show stopper'. Such requirements fit better in Operating Agreements or Tariffs than they do in NERC reliability standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The PSEG Companies agree that Version 0 is a reasonable translation with the exception of the Version 0 Standards identified in Question 2 above.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Redundancies should be eliminated whenever possible.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Acceptable, but not without errors (See specific comments regarding assignment of requirements to BA vs. RA and omission of IA).

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

The specific "Functional Category" must be included if the Version 0 Team intends to do a translation based on the Functional Model. The 'responsibility' for each requirement must be specified and assigned to whatever corporate organization registers for that category. How that organization carries out that requirement (i.e. using Market solutions or by contractual agreement) is not a NERC concern.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The PSEG Companies agree that the specified areas can and should be ceded to NAESB and then allow for NAESB to decide whether or not to continue those requirements.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

The PSEG Companies consider that the TLR requirements focus on transaction modification as the only solution to wide area congestion is an infringement on market solutions to congestion. We would prefer to have a NERC standard to relieve congestion and leave the solution of "How" to relieve the congestion to the RA or the Regional Council.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

The PSEG Companies agree with the recommendation - from a pragmatic perspective but not from a philosophic perspective.

To delegate upwards implies assigning the responsibility for a task from an entity with less responsibility to an entity with more authority. By definition the RA IS the entity with the highest authority, therefore it is incorrect to state that the RA is 'delegating up'.

NERC standards have become an issue mainly because those standards are not 'crisp'. What the Version 0 Team proposes is (at least for this requirement) to continue the old standards' lack of clarity. The RA is a set of responsibilities, and to the extent that today's Reliability Coordinators can meet the tasks set out in the RA category, those Reliability Coordinators can serve to fulfill the RA responsibilities. To the extent that the Reliability Coordinators cannot meet those tasks they risk being found non-compliant to a NERC RA standard. The probability is small that that will happen, hence the pragmatic agreement to continue. We note that a blanket acceptance of all Reliability Coordinators as the organizations that serve to fulfill the RA responsibilities flies in the face of the objective of the Functional Model. Quite simply if a Reliability Coordinator does not have the authority to shed load without asking permission, then, by definition of RA, that Reliability Coordinator should NOT be certified as an RA.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

The PSEG Companies agree with the recommendation - from a pragmatic perspective but not from a philosophic perspective.

The reason we agree to support the Team continuing without the IA function is that the time needed for the discussions to clarify this debate is not available. We do not agree that any 'new tools or procedures' would be needed to implement the simple requirement to implement a transaction. Transaction implementation is done today by control area to control area checkout and can be done tomorrow using the same process. The Functional Model's IA role does not mandate the elimination of BA to BA checkout, but that debate is best left to post Version 0 forums.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R1	Replace OC with STANDARDS DEVELOPER R1 references the NERC OC (The reference should be to the Standards Developer not to NERC and not to a committee)
002		all	Drop references to RSG Standards do not apply to RSG; responsibility is with BA RSG is "a way" to meet reserve obligations From INTRO, R1 holds RSG as responsible as BA; this can be a practice but it is not necessary as there are RSG models that don't hold entire RSG responsible. R5 indicates RSG has outage; outage is with BA not the Group.
002		Notes	Replace Resources Subcommittee with STANDARDS DEVELOPER R2 NOTES references the NERC RS (The reference should be to the Standards Developer not to NERC and not to a subcommittee)
005		R15	If the BA does not have a reliability requirement for Time Error, then the requirement to calibrate the Time error equipment is not needed
006		R5	Replace Resources Subcommittee with STANDARDS DEVELOPER R5 and Levels of Compliance reference the NERC RS (The reference should be to the Standards Developer not to NERC and not to a subcommittee)

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		R1 & R2	<p>RA vs. T-Oper</p> <p>Functional Model does not require T-Oper to have wide-area data, therefore R1 and R2 should be assigned to RA category.</p>
009		R3 & R10	<p>A Distribution Provider needs to present a reasonable Power Factor to the transmission system.</p> <p>RA vs. BA</p> <p>Functional Model does not assume BA has transmission information, thus R3 should place reactive requirements on RA not BA</p> <p>R10 - RA (not BA) will be taking actions re voltage collapse</p>
009		R4 & R6	<p>RA vs. T-Oper</p> <p>R4 is another wide-area vs. local area issue</p> <p>R6 - T-Oper can't be held responsible to disperse Reactive over wide area</p>
014		R4	<p>RA vs. BA</p> <p>Functional Model does not assume BA has transmission information, thus R4 should place analysis requirements on RA not BA</p>
016		M1	<p>The MEASUREMENT seems to be a Requirement.</p> <p>A Measure could be to "have evidence that outages were reported."</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
019		R1	<p>Change generator voice communications requirement with RA to "voice OR data" instead of "voice AND data"</p> <p>In Market environment voice communication with generators is not necessarily required</p>
020		M1 & M2	<p>M1 - The MEASUREMENT seems to be a Requirement on Compliance Manager</p> <p>M2 - The MEASUREMENT is not measurable. Level of Assessment is totally subjective.</p>
021		R3	<p>RA vs. BA</p> <p>R3 should be applied to RA since BA may not have transmission overload information.</p>
022		R4	<p>Replace OC and DAWG with STANDARDS DEVELOPER</p> <p>R4 references the NERC OC and DAWG (The reference should be to the Standards Developer)</p>
024		R10 & R14	<p>PJM agrees that R10 is unenforceable (i.e. that generators shall adhere to ramp schedules)</p> <p>R14 is not a reliability issue as written (Testing of generators on request)</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R4 & R5 & R7	<p>RA vs. BA R4 (second bullet) should be applied to RA since BA may not have transmission information.</p> <p>Business activity R5 many are Generator Operator responsibilities (Delivers, fuel switching, fuel optimization) and are outside RA/BA responsibility.</p>
025		R7	<p>R7 (last bullet) has RA/BA "arranging for fuel deliveries" This is outside the responsibility of such entities</p>
026			<p>RA vs. BA</p> <p>R3 (coordination of load shedding) should be applied to RA since BA may not have wide area information. R7 (coordination of load shedding) should be applied to RA since BA may not have wide area information.</p>
027		R8	<p>RA vs. BA Restoration requires transmission information that BA is not required (by the Functional Model) to have. Requirements must be practical R8 - Verification of Restoration Plans may be simulated but it can't be tested without severe consequences (Isolating NY to test the Plans for NY may not be smiled upon)</p>
031		M1	<p>The MEASUREMENT seems to be a Requirement (shall review program)</p> <p>Measure could be that one has a documented program.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		M1	<p>The MEASUREMENT seems to be a Requirement (shall have certified personnel) Measure could be that one has documentation of Certification of all personnel.</p>
033		R2	<p>Replace OC with STANDARDS DEVELOPER</p> <p>R2 references the NERC OC (The reference should be to the Standards Developer)</p>
034		R7	<p>Requirements must be practical R7 - adequate analysis tools is not a 'crisp' requirement</p>
035		R3	<p>Requirements must be practical R3 - shall KNOW of all facilities that COULD result in IROL. This is not a 'crisp' requirement</p>
039		R4 & M1	<p>Replace OC with STANDARDS DEVELOPER</p> <p>R4 references the NERC OC (The reference should be to the Standards Developer)</p> <p>M1 - The MEASUREMENT seems to be a Requirement (shall conduct an investigation) Measure could be that one has evidence that IROL was relieved in 30 minutes.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	S-1	R1-1 R1-2 M1-1	<p>The requirements under S-1 of the existing document language were eliminated. Significant reduction in requirements.</p> <p>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.</p> <p>M1-1 : Requires documentation and plans by an agent but nothing from the owner.</p>
051	S-2 S-3 S-4	Table 1	<p>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.</p> <p>Table 1: Should address deliverability of generation to load</p>
052	S-1		<p>Add section on corrective action plans that requires that identified issues are resolved in a timely manner.</p>
053	S-1	-	<p>Some of these requirements are by FERC filing or state mandate, not just NERC.</p> <p>This needs to apply to the Transmission Owner or its designated agency such as an RTO/ISO.</p> <p>Need to clarify requirements of end-users of the transmission system</p> <p>Removed requirement to not degrade system when making interconnections (No impairments)</p>
053	S-1	R1-1 R1-3	<p>Need to add Load Serving Entities to list</p> <p>Add "or designated agency" such as RTOs</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
053	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 DCS supply (Utilities are not LSEs)
054 055 056			These standards need to apply more broadly than regions. Probably needs to be with balancing or scheduling authority to be consistent with markets. 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 CDM?
057	S-1	R1-1.3 R1-1.6	Add digital inputs for breaker operation, etc. for sequence of events, harmonics for large HVDC installations, and sequence currents. Add generation and load to applicable installation requirements
058	S-1 S-5		While data on equipment is understandable, schedules for transactions between regions but within the same RTO do not make sense.
058	S-2	R2-1.2 R2-1.5	Add induction generators; governor dead band, droop and limits; generator step up transformer data and taps; metering; and auxiliary system limitations on generator voltage. Add no-load taps for voltage and angle; and type of cooling (FOA units can not be used during black start)

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
063			Looks like a reasonable summary for protection systems and it recognizes transmission, distribution, and generation.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
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NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/>	4 - Transmission-dependent Utilities			
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input checked="" type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments					
Group Name:		Transmission Access Policy Study Group			
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Gayle Mayo	IMPA	TDU			
Doug Curry	Lincoln Electric System	TDU			
William Gallagher	VPPSA	TDU			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

We have reviewed the results of the August 2-3, 2004 NERC-NAESB Joint Task Force Meeting and believe that progress has been made addressing issues we have identified in these comments and our comments to NAESB. At the meeting, apparent consensus was reached between NERC and NAESB Drafting Teams on the division of reliability and business standards. The number of proposed shadow or duplicate NERC/NAESB standards has been reduced, leaving the TLR procedure as the remaining duplicate standard. This reduces but does not eliminate our concerns regarding these shadow standards.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Should issues be successfully addressed, TAPS does not see any "show stoppers" to these Version 0 Standards.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

See comments on individual topics.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

TAPS has several comments on the Version 0 translation of the Functional Model entities in later sections.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

The standard requirements should only apply to the entities that currently are under existing reliability rules and standards. It would be impossible to incorporate all of these new functional entities without changing reliability responsibilities over the existing situation since many of these are not directly covered under today's standards.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Overall, there needs to be a consensus between NERC and NAESB on which parts of the existing reliability rules should be translated into Version 0 business practices. NAESB has a broader list of these than NERC and contemplates up to four other required business practices. TAPS understands that a special committee has been asked to address this issue and suggests waiting until this occurs before signing off on the business practice allocation.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R1 and others	Smaller control areas may be disadvantaged with the change in terminology from Control Area to Balancing Authority. The goal of Version 0 is to make no enhancements over existing the existing situation. TAPS wants to be assured that this name change puts no greater burden on existing control area operators.
004		NAESB interaction	Version 0 of the NERC requirements must be consistent with Version 0 NAESB standards on this topic. The split here between NERC and NAESB needs to be clear, especially where reliability becomes an issue. We agree that the RA has the authority to intervene in a time error correction for reliability purposes.
006		NAESB Drafting Team issue	Inadvertent interchange accounting and payback are primarily business functions. The NERC Drafting Team has retained similar provisions to ensure metering and recording of inadvertent is done for reliability purposes. It is important that these standards remain consistent. Further, only a single dispute resolution process should be put into place.
013		R4	For the TAPS Group, many with smaller loads and transactions, a change in deviation threshold from a percentage to MW value may be preferred. However, Version 0 is a translation of current policies only. For Version 1, a preferred change would be a straight MW deviation threshold level. This approach would maintain reliability and not overly burden small users with no added reliability increase.
014,019,024		Applicability	The hierarchy of the Functional Model requires Generator Operators to report to BAs and TOs even though they may not be required to do this today through reliability rules. Most small generator operators are obligated to provide information through service agreements, only. For many TAPS members, the reporting under 014 (and 016,017,018,019,024 & 065) would be a new burden.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
014,019,024		Continued	<p>The translation to Version 0 should cover current standards and not add new requirements. For Version 1, NERC rules ought to have a cut-off size where small generators would be exempt. In addition, generation behind the meter should be exempt.</p>
016-018		various	<p>For impact on TAPS small generator operators see discussion above. This provision also can add a new burden to Distribution Providers such as municipals, cooperatives and members of Joint Action Agencies. The small utilities may depend upon others for reliability conformance such as load shedding.</p>
016-018		Continued	<p>Since Version 0 is not supposed to change existing rules, this translation to the Functional Model needs to be revised to not place extra burdens on Distribution Providers. For Version 1 of NERC standards, there ought to be flexibility in how smaller distribution utilities participate. There could be a cut-off size thereby exempting small distribution utilities from requirements that do not add to reliability.</p>
005		Applicability	<p>Generator Operators and Load Serving Entities are listed as applicable entities under this translation. GOs and LSEs should not be listed as applicable entities as they are not obligated under existing standards.</p>
007-008		Definitions	<p>The terms System Operating Limits (SOL) and Interconnected Reliability Operating Limit (IROP) need definition either in a glossary or in the standard.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The version 0 standards, which were posted, should include a definition section. The present NERC policies contain appendix A which contains definition for terms. The nomenclature for terms used in defining CPS have changed. The new functional model terms and changes in terminology need to be clearly defined. The standards were difficult to follow without clear definitions.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The tagging standards and operator training standards contain refinements that are different than the present NERC policies. The separation of functions performed by control areas added complexity and differences in some standards that is not in the present policies.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

The use of operating authorities is not crisp. Clearly define the entities involved.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The time error correction, inadvertent payback, transmission loading relief standards, etc. are regional standards. These standards should be retained by the regions and not become NAESB standards.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

The functional model combines the functions provided by Reliability Centers and control areas. The oversight reliability functions performed by Reliability Centers needs to be separated from the reliability functions provided by control areas. The Reliability Center model needs to be retained in version 0.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
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		M9	<input type="checkbox"/>	<input type="checkbox"/>
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70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
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		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
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66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		M1, M2	Using the terms CPS, CPM1, CPM2, and CPR1 make following this standard very confusing. The standard needs to be consistent. It would be easier to stay with CPS 1 and CPS 2.
002		R1	The standard requires that the reserve sharing group have the same responsibilities and obligations of each Balancing Authority within it, with respect to monitoring and meeting the requirements. It is not clear. Does the reserve sharing group become a Balancing Authority? Do all Balancing Authorities within the reserve sharing group have to comply with DCS or just the group as a whole?
002		R5	DCM is not defined. The chart indicates a 10 minute recovery time.
008		Purpose	This standard requires SYSTEM OPERATING LIMIT (SOL) and INTERCONNECTED RELIABILITY OPERATING LIMIT (IROL) violations to be reported to other reliability entities, so that affected entities may take necessary actions to protect the reliability of their systems and the INTERCONNECTION. Is this a change in NERC philosophy to require that adjacent entities protect themselves from entities that violates the standards? It would be better to require that the violator to comply with
009		R2, R3	The version 0 proposal requires transmission operators to acquire reactive support. The transmission operator should have contracts or agreements in place to ensure reactive support to hold appropriate transmission voltages. The use of the term “acquire” implies a purchase.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
010		R2	<p>This standard says INTERCHANGE TRANSACTIONS established to replace unexpected generation loss due to emergency transactions to mitigate SOL or IROL violations are exempt from tagging for 60 minutes. Present policy requires a tag to be submitted within 60 minutes. This changes the current standard.</p>
031 & 032		Applicability, M1	<p>Applying the standards to transmission operators is different from the present policy 8 standard where the standard applies to operating authorities (control areas, ISOs, and reliability centers).</p> <p>The term, critical tasks, is used. This term is subjective and needs to be refined or better defined.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:		David Angell			
Organization:		Idaho Power			
Telephone:		(208) 388-2701			
Email:		daveangell@idahopower.com			
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: WECC Relay Work Group					
Lead Contact		David Angell		Organization: Idaho Power	
Telephone:		(208) 388-2701		Email: daveangell@idahopower.com	
Member Names	Organization	Segment	Member Names	Organization	Segment
Simon Cheng	Puget Sound Energy	1, 3, 5	Lane Cope	WAPA	1, 9
Dick Curtner	Public Service of New Mexico	1, 3, 5	Jon Daume	BPA	1, 9
Malkait Dhillon	Sacramento Municipal District	1, 3, 5	Gene Henneberg	Sierra Pacific Power	1, 3, 5
Michael Ibold	Xcel Energy	1, 3, 5	Bill Kennedy	Alberta Electric System Operator	2
Steven Leistner	PacifiCorp	1, 3, 5	Bill Middaugh	Tri-State Generation and Transmssion	1, 5
Steve Luther	Northwest	1, 3, 5	Craig Richart	Arizona Public	1, 3, 5

	Energy			Service	
Ed Taylor	Pacific Gas and Electric	1, 3, 5	Joe Uchiyama	U.s. Bureau of Reclamation	5
Make Yang	Portland General Electric	1, 3, 5	Gary Young	British Columbia Hydro	1, 3, 5
Ron Lavorine	Southern California Edison	1, 3, 5			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

I agree with regard only to the system protection and special system protection standards.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The Functional Model does not appear to adversely affect system protection

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

The have only marked measures pertaining to system protection.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

I have only marked measure pertaining to system protection.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
063			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).
065	11	M11-1	Should reference 065-R11-1 not 069
065	11	M11-2	Should reference 065-R11-1 not 069
065	12	R12-1	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.
067	3	R3-1	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The Midwest ISO's vote will most likely be based on what is done with Phase 3 and 4 planning standards.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Failure to field test planning standards that have not been in force is a concern. The "NERC Reliability Standards Process Manual" discusses the need for field testing, except in cases where the task is administrative. Implementing untested standards will cause problems, particularly in case where the standard has unforeseen problems but the respective authority conscientiously reports non-compliance.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Hopefully in V1 there will be a mechanism whereby a given functional entity can filter the standards to those items applicable to them.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The terms "transmission provider" and "transmission service provider" are both used in the planning and operating standards. A single term should be used to simplify searching for requirements.

There were a few cases where we believe the functional model mapping is incorrect. Refer to question 13.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

This answer is based on the assumption that naming the authority is intended to provide some clarity on responsibility, not that it creates a contractual obligation or a mandate to obtain agreements between linked Operating Authorities.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

It may be better to defer business practice development until Version 1 is complete.

With the possible exception of time error control. It could be said that the "selling of time" which still shows up in some agreements, is a business practice, however the tertiary control of frequency is not.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

The identification of on/off peak periods is probably a business practice. While not policy, the NERC IOS would be candidates for business practice standards.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

While it is important to migrate to implementation of these standards, circumventing process by not field testing them first is troublesome. Structuring the question this way (not asking whether field testing should be done beforehand, just deleting them) will significantly delay implementaiton.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

While it is important to migrate to implementation of these standards, circumventing process by not field testing them first is troublesome. Structuring the question this way (not asking whether field testing should be done beforehand, just deleting them) will significantly delay implementation.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
51	1		<p>It appears that the existing label heading “System Study/Testing Methods” should be prefixed with “R1-2” to read as follows:</p> <p>“R1-2 System Study/Testing Methods”</p> <p>Then re-number the subsequent R1-“n” headings one number higher than they are presently numbered.</p>
51	1		<p>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</p>
51	1		<p>Replace:</p> <p>5. Have all projected firm transfers modeled.</p> <p>With:</p> <p>5. Have projected firm transfers modeled (includes all firm transfers that are simultaneously possible).</p> <p>Or also affect a market-based notion of firm transfers by replacing with:</p>
18			<p>Why doesn't the Generator Operator have to follow the directives of the Balancing Authority? It seems more appropriate to have the GO accountable to the TO and BA rather than taking direction from the RA</p>
20			<p>This standard references appedicies that will not exist in the future.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
27		R9	While the TO and BA should know the status of their black start resources and the RA should have an understanding of their location and intended use, we're not sure how the RA would "ensure the availability" of the black start resources in its footprint.
37		R8	RAs should notify TOs and BAs about GMDs. It should be up to the BA or perhaps TO to notify their appropriate Generator Operators (not the RA).

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

There has never really been the equivalent of a “planning authority”. There may be some time needed to establish this organizational structure.

The terms "transmission provider" and "transmission service provider" are both used in the planning and operating standards. A single term should be used to simplify searching for requirements.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

In general, the requirements in the Version 0 standards have been incorporated into the new format while remaining true to the original documents. The applicability sections need significant improvements. Assigning responsibility of assessments to multiple parties is very confusing and will lead to duplicative and/or incomplete reports. ERCOT recommends specific important changes in an attempt to clarify the applicability and responsibility for the Version 0 standards.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Lack of clarity into the applicability and responsibility for assessment is a show stopper that can be fixed with the suggestions enclosed.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

ERCOT agrees with the translation of the standard and measurement language, but disagrees with the assignment of key obligations.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The designation of functions assigns multiple parties to several assessment requirements. As described above, this area needs more work. In several areas, the Regional Reliability Council is assigned to gather information or perform assessments that should be, and have been, delegated to transmission owner, operators or planners.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

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Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	I.A Annual Assessment under normal, category B, C and D contingencies	I.A.M1, I.A.M2, I.A.M3, I.A.M4	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 anywhere near the resources required to perform these assessments - the Transmission Planners will continue to perform all of the detailed assessments. Assigning the responsibility to both the Planning Authority and the Transmission Planner will lead to
055	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."
056	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."
058	II.A Steady State and Dynamic Data for modeling and simulations.	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
062	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.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	III.F Special Protection System Assessment	III.F.M3	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

My comments are limited to the Operating Standards only. Bill Bojorquez of ERCOT will submit ERCOT's comments on the Planning Standards.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

None

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Bill Bojorquez will respond to this question for ERCOT.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Bill Bojorquez will respond to this question for ERCOT.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Don't see any "show stoppers" at this point.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

An effort should be made to reduce reduncancies and to clarify requirements where possible without changing intent. However, it is important to track the "shuffling" of existing requirements so that they can be traced back to the original language/requirement. This is key so that a level of comfort can be attained that existing requirements have not been lost.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Overall, I agree, but in some cases, the translations move in the direction of new policy. I.e., it appears that in some cases new tasks/responsibilities are being placed on some entities.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Need to be consistent either way. If we are going to eliminate the Operating Authority term and instead specify the entities, then we need to specify all of the entities to whom the requirement is applicable. The problem here is the issue one gets into anytime a list is used. Did everyone get counted?

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Can't implement the IA without significant changes to existing policy.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Phase 4 compliance templates have not completed field testing and were not approved by the BOT in April 2004. Therefore, they should not be included in this "Version 0" effort.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		N/A	The ACE equation, including definitions needs to be pulled over from Appendix 1A and included within this standard. Also need to decide on whether we are going to use CPS or replace it with CPM. Whichever, need to be consistent.
001		R1	suggest replacing "NERC Operating Committee" with "NERC Operating Committee or its designee".
001		R2	Much of the information contained in this requirement actually comes from the Performance Standards Review Document, not Policy 1.A
001		R3	The proper reference is Policy 1A, Requirement 2.2
001		R4	The proper reference is Policy 1A, Requirement 2.3

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		R4	Should include definition of Reportable Disturbance from Section B.2.4, presently in the notes
005		R1	This requirement is an extension of what exists today. Current language only notes that generation, transmission and load be included in the CA
006		R6	Is the BA always responsible for this calculation or could the TP be the responsible entity?
009		R8	The 2nd paragraph of this requirement calls for the GOP to provide information to its TOP. The current language (see Policy 2B, requirement 4) only indicates that the System Operator is to be provided with information. The proposed language does clarify, but concerned that it is creating a new requirement. Should be a Version 1 consideration.
010		Attachment 1	May need to either add more text or include some references for clarity. For example, "E-Tag System" is referenced for the first time. Where does one go to find out what this is? As another example, there is a reference to a NERC TLR event. Again, this needs to be defined or a reference (to the NAESB TLR Standard?) provided.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		R2	The following text from Pollicy 3A, Requirement 4 should be inserted at the end of the first sentence: "based on established reliability criteria and adequacy of Interconnected Operating Services and transmission rights as well as the reasonableness of the Interchange Transaction Tag."
013		R4	Agree in concept with the proposed modification, but would like some technical support for the proposed breakpoints. It seems that should probably be addressed as a Version 1 modification.
014		R1	As written believe that the proposed requirement extends current policy. Prefer taking the approach that the standard applies only to the BAs and TOPs and that GOP and other functions are obligated through service agreements or interconnection requirements.
017		R2	The proposed language is more proscriptive than the current language. There should be a chain of communication such that the GOP notifies his BA and the BA notifies the TOP and RA.
021		R3	May need to include DP since it is the entity that actually sheds load. Also, GOPs should be notified of transmission overloads that will impact its operation

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
023		R3	Shouldn't the DP be included?
024		R4	This proposed requirement appears to be a new requirement. Policy 6A, Requirement 1.1 only references transmission and generation owners coordinating with their Control Area(s)
025		R5	In response to the Drafting Team's question, Yes, include the list of potential requirements
025		CMP	Why isn't Compliance Template P6T1 incorporated into this standard?
028		LNC	The levels of non-compliance shown in the standard comes from P6T2. Believe P6T3 levels of non-compliance fit here.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
031		R1	In bullet 5, reference is made to Attachment 1, which is Appendix 8B1. However, the appendix was not attached to the standard.
033		R6	The proposed translation appears to be much tighter than the original intent. Current language calls for the OAs and entities to ensure delegated tasks are carried out by NERC certified operators. The proposed language shifts this responsibility to the RA.
034		R3	Believe the proposed change weakens the standard as the current language specifies use of the ISN or RCIS.
038		R11	Under the Functional Model, don't see the RA working directly with the GOP. Should be communicating with the TOP and BA, who then communicates with the GOP.
039		R2	After "For a transmission system", insert " that is experiencing a potential or actual SOL or IROL violation"

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

A few general comments:

- From a format perspective, the operating standards should be consistent in presentation with respect to the incorporation of the Compliance Templates. All categories weren't included in all standards.
- In several operating standards, the drafting team included the RA in its list of entities that qualify as an Operating Authority. Based upon the definition of OA in the NERC Operating Policy, the RC (RA) is specifically excluded from being an OA.
- In some cases, the standard that the Compliance Template is measuring was not incorporated into the standard as a requirement. This should be corrected.
- The Phase IV Planning Standards/templates should not be included in Version 0. They should go through the standard development process as a Version 1 or later items.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The CAISO supports the development of measurable and enforceable reliability standards.

Where no measures or levels of noncompliance exist in Version 0 or the existing compliance templates we would expect that no sanctions would be applied.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

A matrix or cross reference of deleted redundancies will need to be developed.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The RRO and the Reliability Coordinator should be added to the Functional Model!

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
002		Levels of Noncompliance	Level 1 – need to add “...to 95%.”
006		Purpose	Should include "interchange ramps" in the list of things that cause inadvertent.
006		R4	In the last paragraph, the term "non-reliability considerations" is going to be impossible to define in this context. After-the-fact changes that are made between consenting BAs do not affect the interconnection. "Standards" without measures should not be standards as it is not possible to identify compliance/ non - compliance. This should be addressed in Version 1.
006		R4	The Version 1 of this Standard should review the language in the second sentence of the last paragraph "Changes or corrections.." The language should state that reliability functions should drive the after the fact process to reflect system interchange and not market conditions.
006		R5	Should read: BALANCING AUTHORITIES shall report their NET ACTUAL AND NET SCHEDULED INTERCHANGE quantities to their respective Resources Subcommittee Survey Contact by the 15th calendar day of the following month for the purposes of comparison and dispute resolution. The report shall describe..." The 3rd to last paragraph of this section states that only the "monthly summary report" is due by the 15th.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
006		R5	CAISO uses the dispute resolution process designed by WECC, and would continue to use this process. This should be identified as a Regional Difference.
006		R5	Speaks about Appendix 1F. Where will this reside? The WECC is currently revising (updating) its reconciliation that is in due process at this time and it is expected that WECC (and the CAISO) will continue to use this process. This should be identified as a Regional Difference.
006			There does not appear to be a methodology for paying back inadvertent in this procedure. While we realize that NAESB has been given this to handle as a business practice, but that discussion has been going for quite sometime without resolution, and until there is a business practice from NAESB, this needs to be addressed in the NERC Standards.
008		R5	Additionally, the RRO should report to NERC.
008		Measures	2nd paragraph should be changed to read "...within IROL or SOL..." The CAISO believes that suggesting that the determination of an SOL becoming an IROL after the fact is inappropriate.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
010		R1	2.1 P3T3 goes directly to Level 4 violations. The CAISO agrees with the sanctions for a tag violation, but believes the practice as written is too stringent and there should be Level 1 through 4 violations. This should be identified as a Regional Difference.
010		R2	Change "exempt from tagging for 60 minutes" to "tagged within 60 minutes".
011		Regional Differences	Losses are tagged separately in the WECC and the CAISO does not use the losses portion of the tag in its current form. The CAISO would like to add "WECC Losses Waiver" to identify this Regional Difference.
013		R4	The CAISO agrees with the drafting team proposal.
015		R1	Current policy is for data to be updated every 10 minutes, and is in Standard 15. This rate is too slow and should be increased (every 4-10 seconds) when possible. This should be addressed in Version 1.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020		R6	<p>First sentence is confusing. It should state “The Reliability Authority that has any Balancing Authority within its Reliability Authority Area experiencing a potential or actual Energy Emergency shall initiate...”</p> <p>The way it’s written now insinuates that the Reliability Authority is experiencing the Energy Emergency. The standard should be written to say that the BA should be responsible for issuing the EEA.</p>
020		Levels of Noncompliance	<p>Level 4 Non-compliance needs to define what the time frame for a “delay or gap in communications” is. It’s too vague to measure for compliance.</p>
020		Attachment 1	<p>Section 1, 1.1 should read “The LSE cannot schedule the resources necessary to provide its customers energy requirements due to, for example...”</p>
020		Attachment 1	<p>NERC defines what counts as "Reserves" differently than the WECC Minimum Operating Reliability Criteria. A regional difference may be necessary.</p>
020		Attachment 1	<p>Section 1, 2 “Balancing Authorizes” should be Balancing Authorities and the reference to “his” should be changed to “within its”.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R2	In the “Comments” section, the Drafting Team asks about adding the attached “must” statements to the R5 requirement. My answer would be “no” because there are elements to that additional list that not everyone faces such as “Optimizing fuel supply” and “Interruptible and curtailable loads” Keep R5 to a minimum as it’s currently written.
026		Purpose	The purpose statement needs to indicate that this standard is for plans associated with frequency, voltage, and overload conditions.
027		R1	“Load Serving Entities” need to also be identified in the Standard as their restoration plans impact others.
027		R4	The CAISO agrees with the Drafting Team comment, but this needs to be addressed in Version 1.
027		R7	Training of personnel should be on an annual basis to align with the requirement in R3.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
027		Regional Differences	"None Identified" doesn't take into account the WECC automatic load restoration feature to prevent frequency overshoot required as part of the coordinated plan.
028		Purpose	"Each reliability entity needs to Authorities shall have a plan to continue..." Something is missing to make this statement make sense but I'm not sure what that is.
028		R1	3rd bullet on the second page needs to have "are" inserted after "The functions"
033		R1	This Standard presents a challenge because of the way Reliability Coordination has been implemented in the WECC. Empowerment Agreements will need to be modified, along with funding mechanism currently in place. This will likely take a considerable length of time to agree upon and then transition to.
033		R2	Reliability Plan does not have to be an individual RA plan; it can be Regional Reliability Plan. This should be made clear in the Standard

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
034		R1	Should be moved to Standard 29.
034		R3	Should be moved to Standard 29. As for the Drafting teams question “Do TO’s & BA’s have obligations to supply RA’s through the NERC SDX?” The SDX should not become a poor man’s ISN, although this is an Eastern Interconnection issue and of no consequence to WECC operations.
034		R8	“The RELIABILITY AUTHORITY shall have provisions for backup facilities that shall be exercised if the main monitoring system is unavailable.”Not clear in this Standard or Policy 9 if this requirement is for a backup facility or a backup EMS. The RELIABILITY AUTHORITY shall ensure SOL and IROL monitoring and derivations continue if the main monitoring system is unavailable.
038		R1	1.3.9 Planned generation dispatches: The term “generation dispatches” needs clarification; does this mean the AGC set points? Generation hourly schedules? This level of detail is best left to the BA.
038		R10, R11, R12	Regarding directing BA’s to return to CPS and DCS compliance, what Standard (or Policy) will empower the RA to do this? The BA could tell the RA “I’m having a bad CPS day, but I will be O.K. for the year (CPS1) and the month (CPS2)” Is the RA expected to direct the TO they must manually shed load to help the BA meet DCS? At what point in the post disturbance recovery does the RA issue this directive? T+15? Or T+10 so no violation occurs? These actions, if that is what this Standard is

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
038		R17	R17 is about issuing directives, but in the comments section I find this statement; "This requirement is identical to one in Standard 029 and should be deleted in Version 0. R17 is NOT included in S-029, which is about telecommunications.
039		Purpose	Should be changed to "...until adequate relief is obtained through the use of any Interconnection wide, Regional, Interregional or subregional congestion relief process."
039		R7	The column "Existing Document References" lists Policy 9F4, which is about interconnection frequency error. It appears that this Standard is taken from Policy 9F3.1, 9F3.2, and 9F3.3, with TO used in place of RA.
Various			There is an inconsistent usage of capitalization in Standards 20-29 in phrases such as Transmission Operator, Generator Operator, Reliability Authority, and Balancing Authority.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The CAISO recognizes the incredible effort and work that has gone into the translation of these Standards, and thanks the NERC and those individuals responsible. The CAISO also appreciates the opportunity to comment on the proposed new Standards.

Additional comments:

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization:					
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name:					
Lead Contact R. Peter Mackin		Organization: Transmission Agency of Northern California (TANC)			
Telephone: 916-631-3212		Email:			
pmackin@navigantconsulting.com					
Member Names	Organization	Segment	Member Names	Organization	Segment
Chifong Thomas	PG&E	1	Jay Seitz	USBR	5
Matthew Stoltz	Basin Electric Power Cooperative	1	Tom Green	Excel Energy	1
Kyle Kohne	Bonneville Power Administration	1	Donald Davies	WECC	2
John Collins	Platte River Power Authority	1	Steve Rueckert	WECC	2

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		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
062	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.
066			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..."
058			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.
058	2	R2-2	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.
058	6	R6-2	In R6-2, a few of the words in the last sentence duplicate an earlier stated concept. Delete "shall be provided".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
071	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).
051	2 and 3	M2-1, M2-2, M3-1, M3-2	Page 10 of 24, Section 2; Page 16 of 24, Section 3 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?
051	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 measurable standard’. However, M4-1 and M4-2 state, “shall provide assessments” instead of “have available assessments of”. Is this intentional?
065	12		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:
068	3		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).

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
060			Change title to "Electrical Facility Ratings" to better describe the Standard.
060	1		Change time frame for compliance to 30 days. The time frame from the original compliance template appears to have been copied over incorrectly.
060	2	R2-2	Change "Transmission Facility" to "Facility" to more closely match the existing template.
060	2	M2-1	Change "Facility Rating" to "Electrical Facility Rating" to more closely match the existing template.
051	4	M4-1	We believe Measure M4-1 should actually reference Standard 051R4-1 (not Standard 051 R3-1).

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	4	M3-2 (sic)	We believe that Measure M3-2 in Section 4 should actually be designated as Measure M4-2.
063	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.
063	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.
069	1	R1-1	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....
069	3		Under levels of noncompliance Level 1 is missing the 1, it only says Level

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
069	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.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The WECC TSS would like to compliment the NERC Version 0 Drafting Team for an outstanding effort to develop this first draft of the NERC Version 0 Standards.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

I would prefer that all deficiencies be addresses first.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

No comment.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No Comment.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
65	2	2	1st – Poor use of the King's English. If a voltage regulator were out of service without permission for up to nine hours it would be a Level 1, level 2 and a Level 3 crime. Each level should have language such as "for a period greater than __ but less than __ hours".
			2nd – The nature of voltage regulator problems usually take at least an hour to know what you have. The "Level 1" statement should include wordage such as "Failure to report non-automatic voltage regulator operation within one hour of the regulator coming out of service". Subsequent levels of severity of operation without permission would be: 1 to 12 hours, 12 to 24 hours and more than 24 hours.
			Neither of these is a showstopper; they just make sense.
59		4, 5, & 6	Testing for turbine, generator and excitation system dynamic modeling data would best be obtained by the installation of real time digital fault recorders. NERC should specify and approve recorder standards, which would derive the needed information on a per unit basis during the frequent disturbances that occur on a daily basis. Such data would be much more consistent, timely and useful.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:		ISO/RTO Council Standards Review Committee			
Organization:		ISO/RTO Council			
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input checked="" type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments		Group Name: ISO/RTO Council Standards Review Committee			
Lead Contact	Karl Tammar	Organization:			
Telephone:	518-356-6205	Email:		ktammar@nyiso.com	
Member Names	Organization	Segment	Member Names	Organization	Segment
Dale McMaster	AESO	2			
Ed Riley	CAISO	2			
Sam Jones	ERCOT	2			
Don Tench	IMO	2			
Peter Brandien	ISO-NE	2			
Bill Phillips	MISO	2			
Karl Tammar	NYISO	2			
Bruce Balmat	PJM	2			
Charles Yeung	SPP	2			

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The ISO/RTOs believes that the Phase III & IV planning standards should be excluded from the Version 0 Standards. While we are supportive of the Phase III and IV standards, we believe that the industry would benefit from putting these standards through the full standards making process for inclusion in Version 1. Any implementation of the Phase III and IV standards should go through a pilot program and implementation period before formal compliance assessments are completed.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Inclusion of the Phase III and Phase IV Planning Standards would be of great concern to the ISOs and RTOs.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Specific examples and additional commentary may be found in individual ISO/RTO submissions.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

The ISOs/RTOs believe that there should be clear delineation between Business Practices and Reliability standards. The ISOs/RTOs agree that Time Error Correction, Inadvertent Interchange payback, and some Tagging practices are appropriate for Version 0 Business Practices. We strongly encourage a carefully coordinated and timed implementation to avoid conflicts and duplication. The Version 0 Rel Stds must accomplish the fundamental reliability requirements. Further review and comment on the revised standards in anticipation of implementation of Version 1 Reliability Standards would be appropriate.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

The ISO/RTOs agree that the RA is the highest authority and must have ultimate accountability. Splitting and delegating tasks among different organizations must be carefully coordinated so as not to pose any risks to reliability.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
All			Comments on specific Version 0 standards will be included in individual ISO/RTO comment submissions.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Individual ISO/RTO comment submissions will include further details and specific examples on Version 0 standards and related issues.

Every effort should be made to ensure the standards are clearly measurable and complimented by a concise compliance process.

An updated Glossary of Terms and Definitions will be required.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Based on our company's current methods of documentation, some of the required Generator Operator documents are recorded and kept by our company's Transmission Operator's. Our company's departments work together to achieve the required documentation.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

See comments/changes to Version 0

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

See comments/changes to Version 0

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

NipSCO's Transmission Operator Agree's

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Nipco's Transmission Operator Agree's

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Nipco's Transmission Operator Agree's

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
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		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Standard	065	Compliance Templates III.C.M1 III.C.M2 III.C.M3 III.C.M4 III.C.M5 III.C.M6 III.C.M7 III.C.M8 III.C.M9 III.C.M10 III.C.M11 III.C.M12	III. System Protection and Control C. Generation Control and Protection Measurements M1-M12	
Title	Generation Control and Protection	Section	III. System Protection and Control C. Generation Control and Protection	
Purpose	To ensure that generation control and protection systems are planned and designed to provide a balance between the need for generation to support the electrical system and the need to protect generation equipment and to ensure that generation control and protection equipment is accurately modeled in system reliability studies			.
Effective Date	February 8, 2005 all Sections	Approval dates	III.C.M1-12 effective October 9, 2000 Phase III	
Standard Applicability	Section 1 Transmission Operator Section 2 Generator Operator Section 3 Transmission Operator Section 4 Generator Owner Section 5 Transmission Operator Section 6 Generator Owner	Applicable to	III.C.M1 Transmission System Operators III.C.M2 Generation owners/operators III.C.M3 Transmission System Operators III.C.M4 Generation owners/operators III.C.M5 Transmission System Operators III.C.M6 Generation owners/operators	To clarify accountability, responsibility was assigned to either Generator Owner or Generator Operator as

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	Section 7 Regional Reliability Council Section 8 Generator Owner Section 9 Generator Owner Section 10 Regional Reliability Council Section 11 Generator Owner Section 12 Generator Owner		III.C.M7 Regions III.C.M8 Generation owners/operators III.C.M9 Generation owner/operator III.C.M10 Regions III.C.M11 Generation owner/operator III.C.M12 Generation owner/operator	considered appropriate
Section 1	Operation of all synchronous generators in the automatic voltage control mode.	III.C.M1 Brief Description	Operation of all synchronous generators in the automatic voltage control mode.	
Section 1 Applicability	Transmission Operator	III.C.M1 Applicable to	Transmission System Operators	
Section 1 Requirements	<p>R1-1. The Transmission Operator_ shall have procedures <u>requiring Transmission Operator or Generator Operator</u> requiring Generator Operator to provide the following information to them, the Regional Reliability Council, and NERC on request (five business days):</p> <p>a. Summary reports showing the number of hours each synchronous generator did not operate in the automatic voltage control mode during a specified time period, and</p> <p>b. Detailed reports of the date, duration, and reason for each period when a synchronous generator was not operated in the automatic voltage control mode.</p> <p>R1-2. The procedures shall require the Generator Operator <u>and/or Transmission Operator</u> to retain the above information for 12 rolling months.</p>	III.C.M1 Standards and Measurements	<p>S1. All synchronous generators connected to the interconnected transmission systems shall be operated with their excitation system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless approved otherwise by the Transmission Operator.</p> <p>M1. Transmission Operators shall have procedures requiring synchronous generator owners/operators to provide the following information to them, the Region, and NERC on request (five business days):</p> <p>a. Summary reports showing the number of hours each synchronous generator did not operate in the automatic voltage control mode during a specified time period, and</p> <p>b. Detailed reports of the date, duration, and reason for each period when a synchronous generator was not operated in the automatic voltage control mode.</p>	The Functional Model assigns to the Generator Operator the responsibility of reporting of status of automatic voltage regulators to Transmission Operators

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	R1-3. The procedures shall also specify criteria by which generators are to be exempt from the above requirements.		The procedures shall require the generator owner/operator to retain the above information for 12 rolling months. The procedures shall also specify criteria by which generators are to be exempt from the above requirements.	
Section 1 Measures	M1-1. The Transmission Operator has evidence that the written procedures for synchronous generators meet Reliability Standard 065-R1-1 to 065-R1-3.	III.C.M1 Items to be measured	Documentation of procedures for reporting when a synchronous generator is operated without automatic voltage control equipment in service.	
Section 1 Regional Differences	None identified		None identified	
Section 1 Compliance Monitoring Process	On request (five business days). Regional Reliability Council	III.C.M1 Timeframe Compliance Monitoring Responsibility	On request (five business days). Regions	
Section 1 Levels of Non Compliance	Level 1 - Transmission Operator has procedures for Generator Operators to follow but they do not include all of the requirements of above Requirements R1-1 to R1-3. Level 2 - N/A. Level 3 - N/A. Level 4 - Transmission Operator has no procedures for Generator Operator to follow to report generator operation in the non-automatic voltage control mode.	III.C.M1 Levels of Non-Compliance	Level 1 - Transmission Operator has procedures for synchronous generator owners/operators to follow but they do not include all of the requirements of above Measurement M1. Level 2 - N/A. Level 3 - N/A. Level 4 - Transmission Operator has no procedures for synchronous generator owners/operators to follow to report generator operation in the non-automatic voltage control mode.	The Functional Model assigns to the Generator Operator the responsibility of reporting of status of automatic voltage regulators to Transmission Operators

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments

Section 2	Operation of all synchronous generators in the automatic voltage control mode.	III.C.M2 Brief Description	Operation of all synchronous generators in the automatic voltage control mode.	
Section 2 Applicability	Generator Operator	III.C.M2 Applicable to	Generation owners/operators	The Functional Model assigns to the Generator Operator the responsibility of reporting of status of automatic voltage regulators to Transmission Operators
Section 2 Requirements	<p>R2-1 The Generation Operator shall operate each synchronous generating unit connected to the interconnected transmission system in the automatic voltage control mode unless otherwise approved by the Transmission Operator.</p> <p>R2-2 The Generator Operator <u>and/or Transmission Operator</u> shall provide to the Transmission Operator, the Regional Reliability Council, and NERC, on request (30 business days), information on the operation of the synchronous generator’s excitation system according to the Transmission Operator’s procedures for synchronous generators as defined in Reliability Standard 065- R1-1 to 065-R1-3.</p>	<p>III.C.M2 Standard</p> <p>Measurements</p>	<p>S1. All synchronous generators connected to the interconnected transmission systems shall be operated with their excitation system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless approved otherwise by the Transmission Operator.</p> <p>M2. Each synchronous generating unit shall be operated in the automatic voltage control mode unless otherwise approved by the Transmission Operator.</p> <p>Each synchronous generator owner/operator shall provide to the Transmission Operator, the Region, and NERC, on request (30 business days), information on the operation of the synchronous generator’s excitation system according to the</p>	The Functional Model assigns to the Generator Operator the responsibility of reporting of status of automatic voltage regulators to Transmission Operators

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
			Transmission Operator's procedures for synchronous generators as defined in Measurement III.C. S1, M1.	
Section 2 Measures	M2-1. The Generator Operator and/or Transmission Operator shall submit the documentation to be measured to the Regional Reliability Council on request (30 business days) to be reviewed to verify compliance with this Reliability Standard.	III.C.M2 Items to be measured	Information on the operation of synchronous generators in the non-automatic voltage control mode as defined in Measurement III.C. S1, M1.	
Section 2 Regional Differences	None identified		None identified	
Section 2 Compliance Monitoring Process	On request (30 business days). Regional Reliability Councils	III.C.M2 Timeframe Compliance Monitoring Responsibility	On request (30 business days). Regions	
Section 2 Levels of Non Compliance	Level 1 - Reports indicate incidents of synchronous generator operation without automatic voltage control for a total of less than 8 <u>1</u> unit-hours, without permission from the Transmission Operator. Level 2 - Reports indicate incidents of synchronous generator operation without automatic voltage control for a total of less than 16 <u>8</u> unit-hours, without permission from the Transmission Operator. Level 3 - Reports were incomplete, or indicate incidents of synchronous generator operation without automatic voltage control for a total of less than 24 <u>16</u> unit-hours, without permission from the Transmission Operator. Level 4 - Reports on the requested information were not	III.C.M2 Levels of Non-Compliance	Level 1 - Reports indicate incidents of synchronous generator operation without automatic voltage control for a total of less than 8 unit-hours, without permission from the Transmission Operator. Level 2 - Reports indicate incidents of synchronous generator operation without automatic voltage control for a total of less than 16 unit-hours, without permission from the Transmission Operator. Level 3 - Reports were incomplete, or indicate incidents of synchronous generator operation without automatic voltage control for a total of less than 24 unit-hours, without permission from the Transmission Operator. Level 4 - Reports on the requested information were not	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	provided, or indicate incidents of synchronous generator operation without automatic voltage control for a total of 24 unit-hours or more, without permission from the Transmission Operator.		provided, or indicate incidents of synchronous generator operation without automatic voltage control for a total of 24 unit-hours or more, without permission from the Transmission Operator.	

Section 3				
Section 3	Generator operation for maintaining network voltage schedules.	III.C.M3 Brief Description	Generator operation for maintaining network voltage schedules.	
Section 3 Applicability	Transmission Operator	III.C.M3 Applicable to	III.C.M3 Transmission Operator/owner	
Section 3 Requirements	<p>R3-1. Each Transmission Operator shall specify a voltage or reactive schedule to be maintained by each synchronous generator, within the reactive capability of the unit, at a specified bus <u>or as directed by Transmission Operator</u> and shall provide this information to the Generator Operator. The Transmission Operator shall provide documentation of the information provided to the Generator Operator to the Regional Reliability Council and NERC on request (five business days).</p> <p>R3-2. Each Transmission Operator shall maintain a list of synchronous generators that are exempt from the requirement of maintaining a network voltage or reactive schedule. The Transmission Operator shall make available the list of exempt generators to the Regional Reliability Council and NERC on request (five business days).</p>	<p>III.C.M3 Standard</p> <p>III.C.M3 Measurements</p>	<p>S2. Synchronous generators shall maintain a network voltage or reactive power output as required by the Transmission Operator within the reactive capability of the units. Generator step-up and auxiliary transformers shall have their tap settings coordinated with electric system voltage requirements.</p> <p>M3. Each Transmission Operator shall specify a voltage or reactive schedule to be maintained by each synchronous generator at a specified bus and shall provide this information to the generator owner/operator. Documentation of the information provided to the generator owner/operator shall be provided to the Region and NERC on request (five business days).</p> <p>Each Transmission Operator shall maintain a list of synchronous generators that are exempt from the requirement of maintaining a network voltage or reactive schedule. The list of exempt generators</p>	<p>Added the phrase “within the reactive capability of the unit” from S2 to M3 to get R3-1</p> <p>The Generator Operator should receive the voltage or reactive schedule rather than the Generator Owner as the Generation Operator is responsible for generator operation.</p>

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
			shall be made available to the Region and NERC on request (five business days).	
Section 3 Measures	M3-1. The Transmission Operator has documentation of the voltage or reactive schedule provided to the Generator Operator <u>or procedure</u> . M3-2. The Transmission Operator provides to the Regional Reliability Council and NERC upon request (five business days) the list of exempt generators.	III.C.M3 Items to be measured	Documentation of the voltage or reactive schedule provided to synchronous generator owners/operators. List of exempt synchronous generators.	
Section 3 Regional Differences	None identified		None identified	
Section 3 Compliance Monitoring Process	On request (five business days). Regional Reliability Council	III.C.M3 Timeframe Compliance Monitoring Responsibility	On request (five business days). Regions	
Section 3 Levels of Non Compliance	Level 1 - Not applicable. Level 2 - An incomplete list of exempt synchronous generators was provided Level 3 - Incomplete documentation of the requested voltage or reactive schedule <u>or procedure</u> was provided. Level 4 - No documentation of the voltage or reactive schedule was provided	III.C.M3 Levels of Non-Compliance	Level 1 - Not applicable. Level 2 - An incomplete list of exempt synchronous generators was provided Level 3 - Incomplete documentation of the requested voltage or reactive schedule was provided. Level 4 - No documentation of the voltage or reactive schedule was provided	
Section 4	Generator operation for maintaining network voltage schedules.	III.C.M4 Brief	Generator operation for maintaining network voltage	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
		Description	schedules.	
Section 4 Applicability	Generator Operator	III.C.M4 Applicable to	Generation owners/operators	
Section 4 Requirements	<p>R4-1. Generator Operator <u>and/or Transmission Operator</u> shall maintain the synchronous generator voltage or reactive output as specified <u>or as directed</u> by the Transmission Operator <u>within the reactive capability of the units</u>, unless otherwise approved by the Transmission Operator.</p> <p>R4-2. When requested by the Regional Reliability Council and NERC, the Generator Operator <u>and/or Transmission Operator</u> shall provide (30 business days) a log that specifies the date, duration, and reason for not maintaining the established voltage or reactive power schedule, along with approvals for such operation received from the Transmission Operator.</p>	<p>III.C.M4 Standard</p> <p>III.C.M4 Measurements</p>	<p>S2. Synchronous generators shall maintain a network voltage or reactive power output as required by the Transmission Operator within the reactive capability of the units. Generator step-up and auxiliary transformers shall have their tap settings coordinated with electric system voltage requirements.</p> <p>M4. Synchronous generator owners/operators shall maintain the voltage or reactive output as specified by the Transmission Operator, unless otherwise approved by the Transmission Operator.</p> <p>When requested by the Region and NERC, the synchronous generator owner/operator shall provide (30 business days) a log that specifies the date, duration, and reason for not maintaining the established voltage or reactive power schedule, along with approvals for such operation received from the Transmission Operator.</p>	Generator Operators are responsible for generator operation
Section 4 Measures	M4-1. Generator Operator <u>and/or Transmission Operator</u> has a log that specifies the date, duration, and reason for not maintaining the established voltage or reactive power schedule, along with approvals for such operation received from the Transmission Operator.	III.C.M4 Items to be measured	Log of date, duration, and reason for each specified period when the synchronous generator did not maintain the established network voltage or reactive power schedule, with documentation of any approvals for such operation received from the Transmission Operator.	
Section 4 Regional Differences	None identified		None identified	
Section 4 Compliance	On request (30 business days).	III.C.M4	On request (30 business days).	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments

Monitoring Process	Regional Reliability Council	Timeframe Compliance Monitoring Responsibility	Regions	
Section 4 Levels of Non Compliance	<p>Level 1 - Logs indicate incidents of synchronous generator operation off the voltage or reactive schedule for a total of less than 8 <u>1</u> unit-hours, without permission from the Transmission Operator.</p> <p>Level 2 - Logs indicate incidents of synchronous generator operation off the voltage or reactive schedule for a total of less than 16 <u>8</u> unit-hours, without permission from the Transmission Operator.</p> <p>Level 3 - Logs of synchronous generator operation off the voltage or reactive schedule were incomplete, or the logs indicate incidents of operating off the voltage or reactive schedule for a total of less than 24 <u>16</u> unit-hours, without permission from the Transmission Operator.</p> <p>Level 4 - Logs of synchronous generator operation off the voltage or reactive schedule were not provided, or the logs indicate incidents of operating off the voltage or reactive schedule for a total of 24 unit-hours or more, without permission from the Transmission Operator.</p>	III.C.M4 Levels of Non-Compliance	<p>Level 1 - Logs indicate incidents of synchronous generator operation off the voltage or reactive schedule for a total of less than 8 unit-hours, without permission from the Transmission Operator.</p> <p>Level 2 - Logs indicate incidents of synchronous generator operation off the voltage or reactive schedule for a total of less than 16 unit-hours, without permission from the Transmission Operator.</p> <p>Level 3 - Logs of synchronous generator operation off the voltage or reactive schedule were incomplete, or the logs indicate incidents of operating off the voltage or reactive schedule for a total of less than 24 unit-hours, without permission from the Transmission Operator.</p> <p>Level 4 - Logs of synchronous generator operation off the voltage or reactive schedule were not provided, or the logs indicate incidents of operating off the voltage or reactive schedule for a total of 24 unit-hours or more, without permission from the Transmission Operator.</p>	

Section 5	Tap settings of generator step-up and auxiliary transformers.	III.C.M5 Brief Description	Tap settings of generator step-up and auxiliary transformers.	
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Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 5 Applicability	Transmission Operator	III.C.M5 Applicable to	Transmission System Operators	
Section 5 Requirements	<p>R5-1. The Transmission Operator shall have procedures requiring the Generator Owner to provide tap settings, available tap ranges, and impedance data for generator step-up and auxiliary transformers. When tap changes are necessary, the Transmission Operator shall provide the Generator Owner and Generator Operator with a report that specifies the required tap changes and technical justification for these changes. (Suggest) R5-3 The procedures for reporting the data shall also address generating unit exemption criteria (including any that may apply to nuclear units) and shall require documentation of those generating units that are exempt from a portion or all of these reporting requirements.</p> <p>R5-2. The Transmission Operator shall provide documentation of these procedures to the Regional Reliability Council and NERC on request (five business days).</p>	III.C.M5 Standards and Measurements	<p>S2. Synchronous generators shall maintain a network voltage or reactive power output as required by the Transmission Operator within the reactive capability of the units. Generator step-up and auxiliary transformers shall have their tap settings coordinated with electric system voltage requirements.</p> <p>M5. The Transmission Operator shall have procedures requiring synchronous generator owners/operators to provide tap settings, available tap ranges, and impedance data for generator step-up and auxiliary transformers. When tap changes are necessary, the Transmission Operator shall provide the generator owner/operator with a report that specifies the required tap changes and technical justification for these changes. The procedures for reporting the data shall also address generating unit exemption criteria (including any that may apply to nuclear units) and shall require documentation of those generating units that are exempt from a portion or all of these reporting requirements.</p> <p>Documentation of these procedures shall be provided to the Region and NERC on request (five business days).</p>	
Section 5 Measures	M5-1. The Transmission Owner shall have procedures for reporting synchronous generator step-up and auxiliary transformer tap settings and available tap ranges as specified in Reliability Standard 065-R5-1.	III.C.M5 Items to be measured	Procedures for reporting synchronous generator step-up and auxiliary transformer tap settings and available tap ranges.	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	M5-2. The Transmission Owner shall have evidence it provided its procedures for reporting synchronous generator step-up and auxiliary transformer tap settings and available tap ranges to the Regional Reliability Council and NERC on request (five business days).			
Section 5 Regional Differences	None identified		None identified	
Section 5 Compliance Monitoring Process	On request (five business days). Regional Reliability Council	III.C.M5 Timeframe Compliance Monitoring Responsibility	On request (five business days). Regions	
Levels of Non Compliance	Level 1 - Procedures exist but do not include all the requirements as defined in above Requirement R1. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - Procedures were not provided.	III.C.M5 Levels of Non- Compliance	Level 1 - Procedures exist but do not include all the requirements as defined in above Measurement M5. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - Procedures were not provided.	

Section 6	Tap settings of generator step-up and auxiliary transformers.	III.C.M6 Brief Description	Tap settings of generator step-up and auxiliary transformers.	
Section 6 Applicability	Generator Owner	III.C.M6 Applicable to	Generation owners/operators	
Section 6	R6-1. The Generator Owner shall provide the tap settings and the available tap ranges and impedance data for	III.C.M6	S2. Synchronous generators shall maintain a network voltage or reactive power output as required by the	The Generation Owner is responsible for maintenance,

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Requirements	<p>generator step-up and auxiliary transformers (<u>only if Transmission Operator request</u>) to the Transmission Operator, the Regional Reliability Council, and NERC on request (five business days) as defined in Requirement R5-1 of this Reliability Standard.</p> <p>R6-2. The Generator Owner shall change tap positions according to the procedures provided by the Transmission Operator within a mutually agreed upon time frame as defined in Requirement R5-1 of this Reliability Standard <u>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.</u></p>	Standards and Measurements	<p>Transmission Operator within the reactive capability of the units. Generator step-up and auxiliary transformers shall have their tap settings coordinated with electric system voltage requirements.</p> <p>M6. A synchronous generator owner/operator shall provide the tap settings and the available tap ranges and impedance data for generator step-up and auxiliary transformers to the Transmission Operator, the Region, and NERC on request (five business days). A generator owner/operator shall change tap positions according to the procedures provided by the Transmission Operator within a mutually agreed upon time frame as defined in Measurement III.C. S2, M5.</p>	including equipment data, and for providing voltage support to the Transmission Operator
Section 6 Measures	M6-1. The Generator Owner has documentation of tap settings and changes, available tap ranges, and impedances for generator step-up and auxiliary transformers. <u>Auxiliary transformer tap information only required if specifically requested by the Transmission Operators.</u>	III.C.M6 Items to be measured	Reporting of tap settings, available tap ranges, and impedances for generator step-up and auxiliary transformers.	
Section 6 Regional Differences	None identified		None identified	
Section 6 Compliance Monitoring Process	<p>On request (five business days).</p> <p>Regional Reliability Council</p>	<p>III.C.M6 Timeframe</p> <p>Compliance Monitoring Responsibility</p>	<p>On request (five business days).</p> <p>Regions</p>	
Levels of Non Compliance	Level 1 - Report does not include all the information requested as defined Requirement III.C.S2.Section C.R1	III.C.M6 Levels of Non-Compliance	Level 1 - Report does not include all the information requested as defined in Measurement III.C. S2, M5.	

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Heading	New Language	Heading	Existing Document Language	Comments
	<p>Level 2 - Not applicable.</p> <p>Level 3 - Not applicable.</p> <p>Level 4 - Report on tap settings, available tap ranges, and impedances for generator step-up and auxiliary transformers was not provided, or report indicates generator operator did not change tap settings as requested by the Transmission Operator during the mutually agreed upon time frame.</p>		<p>Level 2 - Not applicable.</p> <p>Level 3 - Not applicable.</p> <p>Level 4 - Report on tap settings, available tap ranges, and impedances for generator step-up and auxiliary transformers was not provided, or report indicates generator owner/operator did not change tap settings as requested by the Transmission Operator during the mutually agreed upon time frame.</p>	
Section 7	Generators performance during temporary excursions in frequency, voltage, etc.	III.C.M7 Brief Description	Generators performance during temporary excursions in frequency, voltage, etc.	
Section 7 Applicability	Regional Reliability Council	III.C.M7 Applicable to	Regions	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 7 Requirements	<p>R7-1. The Regional Reliability Council shall establish requirements for generators to remain interconnected during temporary excursions in voltage, frequency, and real and reactive power output. These requirements shall include generator exemption criteria.</p> <p>R7-2. The Regional Reliability Council shall make available documentation of these excursion requirements to the Transmission Operator and NERC upon request (30 business days).</p>	III.C.M7 Standards and Measurements	<p>S3. Temporary excursions in voltage, frequency, and real and reactive power output that a generator shall be able to sustain shall be defined and coordinated on a Regional basis.</p> <p>M7. The Regions shall establish requirements for generators to remain interconnected during temporary excursions in voltage, frequency, and real and reactive power output. These requirements shall include generator exemption criteria.</p> <p>Documentation of these excursion requirements shall be available to the Transmission Operator and NERC upon request (30 business days).</p>	
Section 7 Measures	M7-1. The Regional Reliability Council shall provide to the Transmission Operator and NERC upon request (30 business days) documentation of the requirements for withstanding temporary excursions in voltage, frequency, and real and reactive power output of a generator.	III.C.M7 Items to be measured	Requirements for withstanding temporary excursions in voltage, frequency, and real and reactive power output of a generator.	
Section 7 Regional Differences	None identified		None identified	
Section 7 Compliance Monitoring Process	<p>On request (30 business days).</p> <p>NERC</p>	III.C.M7 Timeframe Compliance Monitoring Responsibility	<p>On request (30 business days).</p> <p>NERC</p>	
Section 7 Levels of Non Compliance	Level 1 - Documentation of Regional Reliability Council requirements provided does not address all three generator parameters (voltage, frequency, or real and reactive power output).	III.C.M7 Levels of Non-Compliance	Level 1 - Documentation of Regional requirements provided does not address all three generator parameters (voltage, frequency, or real and reactive power output).	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	<p>Level 2 - Not applicable.</p> <p>Level 3 - Not applicable.</p> <p>Level 4 - Documentation of Regional Reliability Council requirements was not provided.</p>		<p>Level 2 - Not applicable.</p> <p>Level 3 - Not applicable.</p> <p>Level 4 - Documentation of Regional requirements was not provided.</p>	

Section 8				
Section 8	Coordination of generator controls with the generator's short-term capabilities and protective relays.	III.C.M8 Brief Description	Coordination of generator controls with the generator's short-term capabilities and protective relays.	
Section 8 Applicability	Generator Owner	III.C.M8 Applicable to	III.C.M8 Generator owner/operator	Generation Owner is responsible for this
Section 8 Requirements	R8-1. The Generator Owner shall provide the Regional Reliability Council, the Transmission Operator, and NERC, as requested (30 business days), with information that ensures that the generator voltage regulator controls and limit functions (such as over and under excitation and volts/hertz limiters) coordinate with the generator's short-term capabilities and protective relays, unless exempted by the Regional Reliability Councils.	III.C.M8 Standard Measurements	<p>S4. Voltage regulator controls and limit functions (such as over and under excitation and volts/hertz limiters) shall coordinate with the generator's short duration capabilities and protective relays.</p> <p>M8. Generator owners/operators shall provide the Region, the Transmission Operator, and NERC, as requested (30 business days), with information that ensures that the generator voltage regulator controls and limit functions (such as over and under excitation and volts/hertz limiters) coordinate with the generator's short-term capabilities and protective relays, unless exempted by the Region.</p>	
Section 8	M8-1. The Generator Owner shall have information indicating	III.C.M8	Information indicating coordination of generator voltage	

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Heading	New Language	Heading	Existing Document Language	Comments

Measures	coordination of generator voltage regulator controls and limit functions with the generator's short-term capabilities and protective relays.	Items to be measured	regulator controls and limit functions with the generator's short-term capabilities and protective relays.	
Section 8 Regional Differences	None identified		None identified	
Section 8 Compliance Monitoring Process	On request (30 business days). Regional Reliability Council	III.C.M8 Timeframe Compliance Monitoring Responsibility	On request (30 business days). Regions	
Section 8 Levels of Non Compliance	Level 1 - Information on generator voltage regulator controls and limit functions and their coordination with the generator's short-term capabilities and protective relays was provided, but was incomplete in one or more areas. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - Information on generator controls and their coordination with the generator's short-term capabilities and protective relays was not provided.	III.C.M8 Levels of Non-Compliance	Level 1 - Information on generator voltage regulator controls and limit functions and their coordination with the generator's short-term capabilities and protective relays was provided, but was incomplete in one or more areas. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - Information on generator controls and their coordination with the generator's short-term capabilities and protective relays was not provided.	

Section 9	Speed/load governing system.	III.C.M9 Brief Description	Speed/load governing system.	
Section 9 Applicability	Generator Owners	III.C.M9 Applicable to	Generator owner/operator	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 9 Requirements	<p>R9-1. The Generator Owner shall:</p> <p>(a) Provide the Regional Reliability Council, the Transmission Operator, and NERC as requested (30 business days) with the characteristics of the generator’s speed/load governing system.</p> <p>(b) Coordinate boiler <u>and/or turbine</u>, or nuclear reactor control to maintain the capability of the generator to aid control of system frequency during an electric system disturbance.</p> <p>(c) Report non-functioning or blocked speed/load governor controls to the Regional Reliability Council, the Transmission Operator, and NERC on request (30 business days).</p>	<p>III.C.M9 Standard</p> <p>Measurement</p>	<p>S5. Prime mover control (governors) shall operate with appropriate speed/load characteristics to regulate frequency.</p> <p>M9. Generator owners/operators shall provide the Region, the Transmission Operator, and NERC as requested (30 business days) with the characteristics of the generator’s speed/load governing system. Boiler or nuclear reactor control shall be coordinated to maintain the capability of the generator to aid control of system frequency during an electric system disturbance. Non-functioning or blocked speed/load governor controls shall be reported to the Region, the Transmission Operator, and NERC on request (30 business days).</p>	
Section 9 Measures	<p>M9-1. The Generator Owner shall have documentation:</p> <p>(a) Of the characteristics of the generator’s speed/load governing system</p> <p>(b) That confirms the coordinate boiler <u>and/or turbine</u> or nuclear reactor control to maintain the capability of the generator to aid control of system frequency during an electric system disturbance.</p> <p>(c) Of non-functioning or blocked speed/load governor controls.</p> <p>M9-2. The Generator Owner shall have evidence it reported non-functioning or blocked speed/load governor controls to the Regional Reliability Council, the Transmission Operator, and</p>	<p>III.C.M9 Items to be measured</p>	<p>Documentation of the characteristics of the generator’s speed/load governing system and notification of blocked speed/load governor controls.</p>	

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Heading	New Language	Heading	Existing Document Language	Comments

	NERC on request (30 business days).			
Section 9 Regional Differences	None identified		None identified	
Section 9 Compliance Monitoring Process	On request (30 business days). Regional Reliability Council	III.C.M9 Timeframe Compliance Monitoring Responsibility	On request (30 business days). Regions	
Section 9 Levels of Non Compliance	Level 1 - Information on the generator's speed/load governing system was provided but did not include all the requirements as defined above in Requirement R1. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - Information on the generator's speed/load governing system was not provided.	III.C.M9 Levels of Non- Compliance	Level 1 - Information on the generator's speed/load governing system was provided but did not include all the requirements as defined above in Measurement M9. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - Information on the generator's speed/load governing system was not provided.	

Section 10	Regional procedure on generator protection operations	III.C.M10 Brief Description	Regional procedure on generator protection operation	
Section 10 Applicability	Regional Reliability Council	III.C.M10 Applicable to	III.C.M10 Regions	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 10 Requirements	<p>R10-1. Each Regional Reliability Council shall have in place a procedure for the monitoring, review, analysis, and correction of generation protection system operations.</p> <p>The procedure shall require that misoperations be analyzed for cause and that corrective actions be implemented. The procedure shall also require that a record of such analysis and corrective actions be maintained and be provided to the Regional Reliability Council and NERC on request (five business days).</p> <p>The procedure shall include the following elements:</p> <ol style="list-style-type: none"> 1. Requirements for monitoring, analysis, and notification of all generation protective device misoperations. 2. List of the data reporting requirements (periodically and format). 3. Requirements for analysis and documentation of corrective action plans for misoperations. 4. Periodicity of review of the procedure by the Regional Reliability Council. 5. Identification of the Regional group responsible for the procedure and the process for Regional approval of the procedure. 6. Regional definition of misoperation. <p>R10-2 The Regional Reliability Council shall provide documentation of the procedure for the monitoring,</p>	<p>III.C.M10 Standard</p> <p>III.C.M10 Measurements</p>	<p>S6. All generation protection system misoperations shall be analyzed for cause and corrective action.</p> <p>M10. Each Region shall have in place a procedure for the monitoring, review, analysis, and correction of generation protection system operations.</p> <p>The procedure shall require that misoperations be analyzed for cause and that corrective actions be implemented. (Each Region shall define misoperations.) The procedure shall also require that a record of such analysis and corrective actions be maintained and be provided to the Region and NERC on request (five business days).</p> <p>The Regional procedure shall include the following elements:</p> <ol style="list-style-type: none"> 1. Requirements for monitoring, analysis, and notification of all generation protective device misoperations. 2. List of the data reporting requirements (periodically and format). 3. Requirements for analysis and documentation of corrective action plans for misoperations. 4. Periodicity of review of the procedure by the Region. 5. Identification of the Regional group responsible for the procedure and the process for Regional 	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
	review, analysis, and correction of generation protection system operations to NERC on request (five business days).		approval of the procedure. 6. Regional definition of misoperation.	
Section 10 Measures	M10-1. The Regional Reliability Council has documentation of the procedure for monitoring, review, analysis, and correction of all generator protection operations. M10-2. The Regional Reliability Council shall have evidence it provided documentation of its procedure for monitoring, review, analysis, and correction of generation protection system operations to NERC as requested (five business days).	III.C.M10 Items to be measured	Procedure for monitoring, review, analysis, and correction of all generator protection operations. .	
Section 10 Regional Differences	None identified		None identified	
Section 10 Compliance Monitoring Process	On request (five business days). NERC	III.C.M10 Timeframe Compliance Monitoring Responsibility	On request (five business days). NERC	
Section 10 Levels of Non Compliance	Level 1 - The Regional procedure does not address all the requirements as defined above in Requirement R1. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - The Regional procedure was not provided.	III.C.M10 Levels of Non-Compliance	Level 1 - The Regional procedure does not address all the requirements as defined above in Measurement M10. Level 2 - Not applicable. Level 3 - Not applicable. Level 4 - The Regional procedure was not provided.	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 11	Analysis of misoperations of generator protection equipment	III.C.M11 Brief Description	Analysis of misoperations of generator protection equipment	
Applicability	Generator Owners	III.C.M11 Applicable to	Generation owner/operator	
Requirements	<p>R11-1. The Generator Operator shall:</p> <p>(a) Analyze protection system operations and report and maintain a record of all misoperations in accordance with the Regional Reliability Council procedures in Requirement III.C.S6.Section A.R1.</p> <p>(b) Take corrective actions to avoid future misoperations.</p> <p>R11-2. The Generator Operator shall provide documentation of the analysis and corrective actions to the Regional Reliability Council and NERC on request (30 business days).</p>	<p>III.C.M11 Standard</p> <p>III.C.M11 Measurements</p>	<p>S6. All generation protection system misoperations shall be analyzed for cause and corrective action.</p> <p>M11. Generator owners/operators shall analyze protection system operations and report and maintain a record of all misoperations in accordance with Regional procedures in Measurement III.C. S6, M10. Corrective actions shall be taken to avoid future misoperations.</p> <p>Documentation of the analysis and corrective actions shall be provided to the affected Regions and NERC on request (30 business days).</p>	<p>Comment: “affected” was removed. The original idea was that more than one Region could be affected by a misoperation. Perhaps this should be covered under disturbance reporting</p>
Section 11 Measures	<p>M11-1 The Generator Operator’s documentation of generator protection misoperations, analyses, and corrective actions includes all items specified in Reliability Standard 069-R11-1.</p> <p>M11-2. The Generator Operator shall have evidence it provided the Regional Reliability Council and NERC with documentation of the protective misoperations, analyses and corrective actions as specified in Reliability Standard 069-R11-2.</p>	<p>III.C.M11 Items to be measured</p>	Documentation of protection misoperations, analyses, and corrective actions.	
Section 11 Regional	None identified		None identified	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments

Differences				
Section 11 Compliance Monitoring Process	On request (30 business days). Regional Reliability Council	III.C.M11 Timeframe Compliance Monitoring Responsibility	On request (30 business days). Regions	
Section 11 Levels of Non Compliance	Level 1 - Documentation of generator protection system misoperations was provided but does not address all identified misoperations or does not provide a record of corrective actions taken for all identified misoperations. Level 2 - Documentation of generator protection system misoperations was provided but was lacking one of these three elements: (a) a complete record of misoperations for the time and place requested, (b) an analysis of all misoperations, and (c) a record of corrective actions taken. Level 3 - Documentation was provided but was lacking two of these three elements: (a) a complete record of misoperations for the time and place requested; (b) an analysis of all misoperations; (c) a record of corrective actions taken. Level 4 - No documentation of generator protection system misoperations was provided	III.C.M11 Levels of Non- Compliance	Level 1 - Documentation of generator protection system misoperations was provided but does not address all identified misoperations or does not provide a record of corrective actions taken for all identified misoperations. Level 2 - Documentation of generator protection system misoperations was provided but was lacking one of these three elements: (a) a complete record of misoperations for the time and place requested, (b) an analysis of all misoperations, and (c) a record of corrective actions taken. Level 3 - Documentation was provided but was lacking two of these three elements: (a) a complete record of misoperations for the time and place requested; (b) an analysis of all misoperations; (c) a record of corrective actions taken. Level 4 - No documentation of generator protection system misoperations was provided	

Section 12	Maintenance and testing of generator protection systems	III.C.M12 Brief Description	Maintenance and testing of generator protection systems	
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Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Section 12 Applicability	Generator Operator	III.C.M12 Applicable to	III.C.M12 Generator owner/operator.	
Section 12 Requirements	<p>R12-1. Generator Operators shall have a generator protection system maintenance and testing program in place. This program shall include protection system identification, frequency of protection system testing, and frequency of protection system maintenance.</p> <p>R12-2. Documentation of the program and its implementation shall be provided to the appropriate Regional Reliability Council and NERC on request (30 business days).</p>	III.C.M12 Standards and Measurements	<p>S7. Generation protection system maintenance and testing programs shall be developed and implemented.</p> <p>M12. Generator owners/operators shall have a generator protection system maintenance and testing program in place. This program shall include protection system identification, frequency of protection system testing, and frequency of protection system maintenance.</p> <p>Documentation of the program and its implementation shall be provided to the appropriate Regions and NERC on request (30 business days).</p>	
Section 12 Measures	<p>M12-1. The Generator Operator 's generator protection system maintenance and testing program and its implementation includes all items specified in Reliability Standard 065-R12-1.</p> <p>M12-2. The Generator Operator shall have evidence it provided documentation of its generator protection system maintenance and testing program and its implementation to as specified in Reliability Standard 065-R12-2.</p>	III.C.M12 Items to be measured	Documentation and implementation of generator protection system maintenance and testing program.	
Section 12 Regional Differences	None identified		None identified	
Section 12 Compliance Monitoring	On request (30 business days).	III.C.M12 Timeframe	On request (30 business days).	

Draft Version 0 Standard Language		Source Document		
Heading	New Language	Heading	Existing Document Language	Comments
Process	Regional Reliability Council	Compliance Monitoring Responsibility	Regions	
Section 12 Levels of Non Compliance	<p>Level 1 - Documentation of the maintenance and testing program was provided, but records indicate that implementation was not on schedule.</p> <p>Level 2 - Documentation of the maintenance and testing program was incomplete, but records indicate implementation was on schedule.</p> <p>Level 3 - Documentation of the maintenance and testing program was incomplete, and records indicate implementation was not on schedule.</p> <p>Level 4 - No documentation of the maintenance and testing program or its implementation was provided.</p>	III.C.M12 Levels of Non-Compliance	<p>Level 1 - Documentation of the maintenance and testing program was provided, but records indicate that implementation was not on schedule.</p> <p>Level 2 - Documentation of the maintenance and testing program was incomplete, but records indicate implementation was on schedule..</p> <p>Level 3 - Documentation of the maintenance and testing program was incomplete, and records indicate implementation was not on schedule.</p> <p>Level 4 - No documentation of the maintenance and testing program or its implementation was provided.</p>	

COMMENT FORM PART 2 – QUESTIONNAIRE
Draft 1 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 1 of the Version 0 Reliability Standards. Comments must be submitted by **August 9, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Version 0 Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

Commenter Information					
Name:					
Organization:					
Telephone:					
Email:					
NERC Region		Registered Ballot Body Segment			
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners			
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils			
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities			
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities			
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators			
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers			
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users			
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users			
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities			
<input type="checkbox"/> WECC	<input type="checkbox"/>				
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>				
Group Comments Group Name: SERC Generation Subcommittee (GS)					
Lead Contact		Chris Schaeffer (GS Chair)		Organization: Duke Power Co.	
Telephone:		704-382-3658		Email: ceschaef@duke-energy.com	
Member Names	Organization	Segment	Member Names	Organization	Segment
Mike Mears	Alcoa Power Generating, Inc.	5	Chris Schaeffer	Duke Power Co.	5
James E. Freshwater	Entergy Services, Inc.	5	Chris Georgeson	Progress Energy Carolinas	5
Troy Reynolds	Progress Energy Carolinas	5	Carter Edge	Southeastern Power Administration	5
Terry Crawley	Southern Company Services, Inc.	5	David Thompson	Tennessee Valley Authority	5
Jerry Nicely	Tennessee Valley Authority	5	Howard Mindel	U S Army Corps of Engineers	5

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

This assumes that measurements that have not completed field testing/due process are excluded from the Version 0 standards. (See our responses to Questions # 11 and # 12).

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Yes, see our responses to Questions # 1, # 11, and # 12)

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The inclusion of generator standards that have not been through due process causes a significant change in the obligations imposed on the generator operators/owners.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

We do not believe developing new responsibilities should be included as the translation of the Operating Policies.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No Comment

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

No Comment

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

There were a significant number of comments recommending numerous "fixes" to the III.C standards/measurements when they were field tested. These comments have not yet been addressed, and should be considered in Version 1. If any of the III.C measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

All Phase IV standards/measurements require significant "fixes" and should be considered in Version 1, not Version 0. However, we realize that there may be other factors influencing the decision to keep some of these in Version 0. If any Phase IV measurements are included in Version 0, standards should be revised as per previously provided comments, and then they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

No additional comments

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

No

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Any improvements and clarified redundancies should be clearly identified in the next draft of the Version 0 standards. In addition, the same approach should be applied when combining the planning and operating standards.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

The DST did a very good job for a first-cut at the transition.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Including these functions in the standards clearly identifies who is responsible for specific items and eliminates any potential confusion at a later date.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

NAESB has already been working on these issues and is well along the way in the development of these business practices. Isn't it too late to be asking if this is where these items belong?

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

None at this time.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

We agree due to the limited time available to complete the transition. There are concerns that given this approach, how difficult will it be to make the change to the Interchange Function at a later date.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
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		M11	<input type="checkbox"/>	<input type="checkbox"/>
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71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
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62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
005		R2	This requirement could be an example of redundancy in that it could be handled in Standard 001 to the extent that Standard 001 and 005 could be combined.
001		Compliance Monitoring Process	Why will the Compliance Monitoring Process be removed from the Version 0 Standards? Won't they have to be re-inserted at a later date?
002		M1	Something is missing between Determination of ACEM or ACEm and the following ACE chart.
008		Compliance Monitoring Process	Some words are missing in the sentence immediately following the five bulleted items.
009		R5	Should be incorporated into R4.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
010		Regional Differences	SPP has a Scheduling Agent Waiver and should be listed here also.
013		R4	We concur with the changes proposed by the DST and further agree to the 10% criteria for transactions larger than 100 MW.
014		R4	Yes, load forecasting, or the ability to "predict the system's near-term load pattern" is a reliability issue.
016		R1	We concur with the DST recommendation to use the timing requirements contained in Policy 9.
024		R10	We don't fully appreciate the comment that the DST has inserted for this requirement. We would not be comfortable if this requirement were deleted.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
025		R5	The list should be included in the standard as a list of considerations for the plan but not as required actions.
026		R4	This requirement calls for the TO or BA to manually initiate automatic load shedding schemes. Manual intervention should not be required for automatic load shedding schemes.
026		Purpose	Yes, some of these requirements could be carefully moved to the emergency operations standard.
027		R4	Leave the requirement as it is currently worded.
028		Applicability	Should Generation Operators be included?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		R1	Attachment 1 is missing from item 5.
034		R3	<p>We do not feel that the requirement needs any additional clarification.</p> <p>Also, TOs and BAs do not have an obligation to supply RA information through the NERC SDX, the RA has that obligation.</p>
038		R17	We can not find a duplicate requirement in Standard 029. Standard 029 addresses communications facilities while this requirement deals with the mechanics of voice communications.
015		R4	<p>The last sentence in this requirement should read:</p> <p>Balancing Authorities and Transmission Operators shall provide the types of data as listed in Attachment 1, unless otherwise agreed to by the Balancing Authorities and Transmission Operators with immediate responsibility for operational security.</p>
020		R5	Attach 5C in the last bullet item should be Attachment 1.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
028		Purpose	<p>Shouldn't the purpose read:</p> <p>Each Reliability Authority shall have a plan to continue reliability operations in the event its control center becomes inoperable.</p>
028		R1	Inter-area in the second bullet item should be hyphenated.
030		M1	Remove "exists" from the first line of 1.
031		R1	Attachment 1 in 5. is missing.
033		Purpose	Remove the duplicate "that" in the last line.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Please number or label the pages in the next draft.

Some of the document references do not exist. For example, the reference for Requirement 3 of Standard 001 is Policy 1A, Requirement 2.4 which doesn't exist. The correct reference is Policy 1A, Requirement 2.2. Similarly, the reference for Requirement 4 of the same Standard is Policy 1A, Requirement 2.3. This occurs randomly throughout the standards and is very confusing.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

These new NERC Standards are designed to encompass all market participants. It is imperative that all market participants (including Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing Selling Entities) register in their applicable areas and provide the needed information as requested from the Reliability Authority, Balancing Authority, or Transmission Operator. NERC must ensure that full registration of all parties is required and accomplished.

Commenting on the Operating Standards, in general, the standards appear to be a fair translation from the operating policies into the proposed standards incorporating the functional entities. Overall, there appear to be a significant number of requirements which do not have accompanying compliance measures and therefore are not enforceable. Some specific comments on individual standards need to be addressed prior to approval.

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

None

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Some seemingly redundant statements in the draft standards, when taken into context, offer conflicting points of view or can be misinterpreted and lead to confusion on implementing the overall purpose of the standards (e.g. Energy Emergency Alerts and Emergency Load Shedding discussed in the Policy 5, 6, and 9 standards)

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

The functional model creates error precursors with respect to communications and timely actions required in power system emergency scenarios and thus we cannot support implementation of the functional model in part or in whole.

There are some aspects of the standards that tend to dilute authority among these entities leading to "who has overarching authority?" with respect to directing actions for preserving reliability. Segregating reliability functions via the functional model lends itself to miscommunications and/or lack of communications and questions of authority as revealed in the August 14 blackout.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

- Include these other functions as appropriate in a specific requirement.
- Do not include these functions in the requirements.

Comments

Need to make sure hierarchy among these entities is established and referenced in standards. Also, with respect to service agreements outside of the standards, our stance is that if it's warranted standard practice for maintaining reliability, then it should be included in the Reliability Standards.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
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- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Inadvertent payback is a reliability issue with respect to bounds placed on when and how much inadvertent can be paid back via a unilateral process. Also, tag approval should remain a reliability standard.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Within this question it is stated that in certain regions control areas will need to be deemed the Reliability Authority. If you must implement the functional model in part or in whole, we adamantly support this position. Certain state regulatory statutes will require such designation. The ability of a utility to be designated as the Reliability Authority which would then have the capability to support an "upward" delegation of certain tasks to a third party that could provide a wide-area view is an essential component in the acceptance and implementation of the NERC functional model.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
		M9	<input type="checkbox"/>	<input type="checkbox"/>
		M10	<input type="checkbox"/>	<input type="checkbox"/>
		M11	<input type="checkbox"/>	<input type="checkbox"/>
		M12	<input type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments

See comments on Planning Standards submitted by Progress Energy Transmission Planning

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
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62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

See comments on Planning Standards submitted by Progress Energy Transmission Planning

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
02		R6	As a "Standard", the 90 minute rule for re-establishing contingency reserves should not be subject to arbitrary change by the NERC OC. This statement applies across the board to each standard represented in Version 0. In addition, many Reserve Sharing Groups have legally binding contracts in place that cannot easily be changed, resulting in noncompliance.
08		R4	"Applicability" for this standard should include "Reliability Authorities"
08		R1-R5	In general, unless better bounds/criteria are set for the determination of IROLs, this standard will not be enforceable or auditable.
010		R2	Will a new tag template be issued to conform with the functional entities? Will E-tag Spec need to be changed to implement this standard?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
013		R4	The Drafting Team proposed improvement is acceptable. I still have reservations with the fact that this standard could require me to re-tag a firm dynamic transaction in a window that would cause it to be treated as non-firm for curtailment purposes during TLR. In addition, large balancing authorities which do not have to tag internal transactions, and thus are not subject to this standard, may cause harm to smaller neighboring balancing authorities which are subject to this standard.
014		R4	Load forecasting is the starting point for planning capacity for obligations and thus, deemed to be required for reliability.
016		R1	These requirements should be left to policy 9 in version 0
019		R1	In general, with the large amount of merchant generators, how can we ensure they will register as generator operators and thus comply with these standards?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R10	Adherence to ramp schedules should be required. This requirement is a good example of where developing a meaningful measure may be difficult.
026		R1	Implementation of load shedding should be moved to policy 5 and 9 requirements
028		R1	"AREAS" needs to be redefined in terms of the functional entities.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Comments on proposed NAESB Business Practices:

NAESB Coordinate Interchange Business Practice Standard

Comment: A new tag template which incorporates the new functional model entities needs to be developed and incorporated into the e-tag specification documentation.

Comment: The "Timing Requirements for Reallocation when in a TLR Event" should be waived for all firm dynamic schedules which must be re-tagged for compliance with Reliability Standard 013 Requirement 4 within the "35 minute prior to the top of the hour" window.

NAESB Transmission Loading Relief Standard

Comment: Only the definitions of TLR levels and order of implementation of the TLR process should be included as a Business Practice Standard in order to ensure equitable treatment for curtailments and adjustments of transactions. Actual implementation is a reliability function only and thus, should not be included in the Business Practice Standard.

Area Control Error (ACE) Special Cases

Comment: Tagging requirements for dynamic schedules are governed in Policy 3 Reliability Standards, yet dynamic schedule impacts on the ACE equation are included as a Business Practice. Since ACE dictates compliant Balancing Authority actions associated with performing the BA's required actions for reliable operations, it is important that all components of the ACE equation be governed by through a Reliability Standard.

NAESB Time Error Correction Standard

Comment: Time Error Correction is appropriate for a Business Practice since it has commercial implications associated with ensuring all Balancing Authorities participate. In addition, the Reliability Authority may terminate a time error correction in order to preserve reliability.

NAESB Inadvertent Interchange Standard

Comment: Inadvertent interchange payback can have both commercial and reliable operations impacts and thus should be governed by both Business Practice Standard and Reliability Standard.

Business Standard Emergency Operations

Comment: It is clearly stated that emergency actions shall be performed "regardless of costs". Since Policy 5 provides specific direction for emergency actions that state commercial implications should not be a consideration in mitigating energy emergencies, it is deemed inappropriate to govern these actions through a Business Practice Standard.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Reliant recognizes and supports the importance of reliability. The new Version 0 Standard 59 is the applicable standard for generator testing. Some portions of this Standard are being performed and complied with now in the regions where Reliant generators are located. In cases where older units have analog systems it is impossible to do the required testing without adding additional equipment. It appears that these standards are being applied " across the Board " , regardless of generator size, location, age, etc. Testing requirements should differentiate among the type and size of the unit. Grandfathering units 50 MW's and under and that operate less than 100 hours per year may be a reasonable exception criteria. As written the proposed standards do not allow engineering judgement and/or manufacturers data to be used in lieu of testing. Operational data and event response data should be acceptable in lieu of testing.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

See question 13 potential show stoppers are the generator testing requirements. We feel that these requirements more appropriately belong in Operating agreements and Tariffs.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Version 0 is a reasonable translation.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Include the other functions as appropriate. It is the responsibility of each organization to meet its obligation.

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

No comment.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

No comment.

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

No comment.

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>
		M5	<input type="checkbox"/>	<input type="checkbox"/>
		M6	<input type="checkbox"/>	<input type="checkbox"/>
		M7	<input type="checkbox"/>	<input type="checkbox"/>
		M8	<input type="checkbox"/>	<input type="checkbox"/>
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68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input type="checkbox"/>
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		M5	<input type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
		M4	<input type="checkbox"/>	<input type="checkbox"/>

Comments
No comment.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input type="checkbox"/>
		M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>

Comments

Reliant is commenting on Standard 59 only. Reliant supports keeping the standards with the modifications noted in question 13.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
59		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.
59		R3-1	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.
59		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.
59		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.
59		R6-1	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.

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Could have the first round of comments based on no simplification of existing standards and then have the second round incorporate the improvements.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Had some questions on individual standards that are noted at the end.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

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- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Time error correction needs to be limited to a frequency range that should be defined by NERC.

In general we believe the idea of having "shadow" standards is troublesome as it presents the industry with a problem of having one area addressed by differing standards in the future. We believe that the Version 0 NERC/NAESB Standards should keep any overlapping items in NERC Version 0 (items with overlapping business practices), and address the split of such business practices in NERC/NAESB Version 1.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Responsibilities need to be specified. This would be the only way to determine level of compliance in audits or when an event triggers an investigation.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

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		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Standard 70 list IV.A.M2 and IV.A.M3. I was not able to find existing M2 and M3 to compare with.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

If standard was not translated then recommended it be deleted.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		R3	Are CPM 1 & 2 replacing CPS 1 & 2?
002		R5	Is DCM replacing DCS?
002		M1	Under Determination of ACE(M) or ACE(m) the last paragraph ends with "...the ACE measured fifteen minutes following the" The What?
005	All		Who is the Balancing Authority – Title not utilized in Policy 1 section E.
008		Levels of Non- Compliance	Third item in this section. A limit violation which is reported to the Reliability Coordinator appears to become a level of violation for the Transmission Owner. This item should be included in the Reliability Coordinator Standards and not in this Standard or the Level of non-compliance should be detailed as to who is non-compliant.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
009	All		What is the difference between Balancing Authority and Reliability Authority
009		R8	Policy 2B Requirement 4.2 does not currently exist in the NERC Operating Policies.
014			This Standards Requirements should be incorporated into Standards 7 and 9 in order to remove some redundancy.
015		Applicability and R1	This Standard does not include as Applicability, Generation Operators. This would require the Transmission Owner or Balancing Authority to be responsible in providing Merchant generator data. The Applicability should include Generation Operator.
017		R1	The policy only addresses the Transmission Operator as only being required to have knowledge of the protective systems and limitations. The standard includes the Balancing Authority, Reliability Authority, Generation Operator and Transmission Operators are all required to be familiar with protection systems and limitations. (Major change from the way the policy is written).

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
017		R2	If a protective relay or equipment failure reduces system reliability, the Transmission Operator or Generator Operator shall notify the affected Reliability Authorities, Transmission Operators and Balancing Authorities and shall take corrective action as soon as possible. (The notification protocol needs to be specified)
017		R3	Transmission Operators and Generator Operators shall coordinate all new protective systems and all protective system changes with affected Reliability Authorities, Transmission Operators and Balancing Authorities. (Again-protocol for coordination should be established)
017		R5	Each Transmission Operator and Generator Operator shall notify its Reliability Authorities, Transmission Operators, and Balancing Authorities. (Does the TO and GO both need to notify RA)
019		R1	The Balancing Authority, Transmission Operator, and Generator Operator shall have communications (voice and data links) with appropriate Reliability Authorities, Balancing Authorities and Transmission Operators. Such communications shall be staffed and available for addressing a real-time emergency condition. (Should the voice link be defined? (Landline, emg. radio)?)
019		R2	The Balancing Authority and Transmission Operator shall notify its Reliability Authority and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area. (Should communication paths be consistent)?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
019		R4	<p>The Reliability Authority, Transmission Operator and Balancing Authority shall issue directives in a clear, concise and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings. (What is the protocol for directives?)</p>
020	All	R2, R5, 6	<p>The term "Reliability Coordinator" is used. Should this read "Reliability Authority"?</p> <p>Keep the font size the same where it states "Balancing Authority".</p> <p>In the "Existing Document References" column, it says Requirement "7" and should be Requirement "6"</p>
020	All	Attachment 1 Energy Emergency Alerts document Section B	<p>Section 2.4 (third page) it states, "Evaluating and mitigating...review all "Operating Security Limits"..." Should these read "Security Operating Limits (SOL)"? This also appears twice in section 2.4.4.</p>
020	All	Attachment 1 Energy Emergency Alerts document Section B	<p>Section 2.6 states, "Before declaring an Alert 3, the Energy Deficient..." Should this read Before "requesting" an Alert 3... The Energy Deficient Entity requests the declaration of an Alert, whereas the Reliability Authority declares the Alert.</p>
020	All	Attachment 1 Energy Emergency Alerts document Section B	<p>Section 3.4, third sentence states, "...Energy Deficient Entity who has declared an Energy Emergency... Once again as above, this should read, "...Energy Deficient Entity who has "requested declaration of" an Energy Emergency..."</p> <p>Section 3.4, uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020	All	Attachment 1 Energy Emergency Alerts document Section B	<p>Section 3.4.2, 3.5, 3.5.1 also contain "Operating Security Limits" instead of SOL's as stated above.</p> <p>Section 3.5, the last line states, "...shall notify its respective Reliability Authority and downgrade the Alert." It should read "...shall notify its respective Reliability Authority "to" downgrade the Alert." The EDE does not declare or downgrade the Alerts.</p>
020	All	Attachment 1 Energy Emergency Alerts document Section C	<p>Section C, second line states, "...declaring an Emergency Alert 3 must..." It should read, ..."requesting declaration of" an Emergency Alert 3 must..."</p>
023		R1	<p>Shouldn't this include sabotage event notification for any part of the interconnection and not only "larger" portions?</p>
023	All	R1	<p>Second line states, "...shall have procedures for making operating...". Should read, "shall have procedures for "the recognition of and for" making operating..."</p>
024	Purpose	R1	<p>Shouldn't "reasonable future time period" be defined?</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
024		R1, R2, R3 & R4	Should one group take ownership of this responsibility and coordinate with others or should this be managed internally?
024		R14	Shouldn't one authority or TO make the request of the GO.
024		R15	Does the GO need to notify both the Balancing Authority and TO. Wouldn't it be better for the GO to notify the Balancing Authority and then in turn notify the TO?
024		R16	There should be protocol here. The request should come from either the Balancing Authority or TO not from both.
027	All	Purpose	First line states, "To ensure each reliability entity develops and annually...". Should this read, "To ensure each "Reliability Authority, Transmission Operator, and Balancing Authority" develops and annually...".

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
027	All		In standard # 27, page 104 is a copy (repeat) of page 100 in standard # 26 (page 100). Delete page 104 as it is a copy of page 100 and does not belong there.
028		R1	Bullet item 9 does not fit this Standard and should be removed. This bullet item would better fit into Black Start Standard not Backup Facilities Plans.
028		Compliance Monitoring	Remove Item 3. This would better fit into Black Start Standard not Backup Facilities Plans.
028	All	Purpose, Levels of Non Compliance	<p>First line states, "Each Reliability entity needs to Authorities shall have..." This should read, "Each "Reliability Authorities, Transmission Operator, and Balancing Authorities" need to have..."</p> <p>Last line states, "Plan exist but does not address two or more of the nine requirements...". Should read, "Plan exist but does not address two or more of the "10"...".</p>
037	All		This standard refers to the Generation Operator and Generation Owner. What is the difference? Should the standards be consistent and use Generation Owner or Generation Operator in all applications?

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
051	All		PA and TP are identified as applicable entities. If the footprint of the PA is comprised of the TP's and the requirements of the std relate to applying performance measures against the footprint then what additional requirement would the Planning Authority have that is not already covered by the Transmission Planners? In cases where a PA exists then it would seem more appropriate for the PA to be the responsible entity for its entire footprint.
053	Purpose		Change "those responsible for reliability..." to "the applicable Transmission Owners". This makes it consistent with the functional model concept.
058	2-4	R2-1, R3-2, R4-1	Change "...entities responsible for reliability..." to "Planning Authorities, Transmission Planners and Transmission Owners..." This makes it consistent with the functional model concept.
059		R1-1	What is defined as a Generator test Schedule? Over what timeframe and what information should it include? The generator testing requirements are defined in the ECAR Document 4 and does not include a schedule.
061	1	Non-Compliance Levels 1 & 4	Change "...the entities responsible for reliability..." to "the applicable Planning Authority..." This makes it consistent with the functional model concept. Change "Region" to "Regional Reliability Council.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
061	3		What does “no translation attempted” mean? What will Version 0 look like?
061	4	R4-1	Change “...entities responsible for reliability...” to “Planning Authorities, Transmission Planners and Transmission Owners...” This makes it consistent with the functional model concept.
063	3		Need to include “Distribution Provider that owns transmission protection systems” in this section, since it was included in Section 2.
063	2	R2	R2 (relay misoperations) applies to Distribution Providers but this group is not included in R3 (relay maintenance responsibility).
063		M3-1	Delete the phrase “has a system”.

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

- Be consistent in utilizing the term “Responsible Entity” in places to avoid repeating each entity. Some standards utilize this method while others spell out each entity throughout the standard.**
- Be consistent in how entities are listed in Standard Applicability. Some standards break it down by listing the section number and entities while others just list all the entities without reference to section number.**
- Avoid use of the term “entities responsible for the reliability of the interconnected transmission system” in the new standards and use the Functional Model entities.**
- No significant change in requirements from the old language; mostly formatting and changing from ‘region’ to ‘regional reliability council’.**
- Boilerplate language has been added to most standards; “...shall have evidence it provided...” This requires the transmission owner, etc. to ‘have evidence’ that it complied with the data reporting requirements. In the past ECAR compliance data has been transmitted by fax, e-mail, U.S. mail. Evidence could mean (a) keep a copy, (b) a receipt from ECAR or NERC, (c) a central log book of such transmissions, (d) something else.**
- The time allowed to respond to a NERC data request is sometimes in terms of days and sometime in business days.**

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Could have the first round of comments based on no simplification of existing standards and then have the second round incorporate the improvements.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Had some questions on individual standards that are noted at the end.

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Time error correction needs to be limited to a frequency range that should be defined by NERC.

In general we believe the idea of having "shadow" standards is troublesome as it presents the industry with a problem of having one area addressed by differing standards in the future. We believe that the Version 0 NERC/NAESB Standards should keep any overlapping items in NERC Version 0 (items with overlapping business practices), and address the split of such business practices in NERC/NAESB Version 1.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Responsibilities need to be specified. This would be the only way to determine level of compliance in audits or when an event triggers an investigation.

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

- Agree.
- Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M9	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M10	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M12	<input checked="" type="checkbox"/>	<input type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Standard 70 list IV.A.M2 and IV.A.M3. I was not able to find existing M2 and M3 to compare with.

Question 12:

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57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M4	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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		M3	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

If standard was not translated then recommended it be deleted.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
063		Levels of Non- Compliance Level 1 & 2	Level 1 and 2 appear to be reversed. They do not agree with the Level 1 and 2 Levels of Non-Compliance in standard 065, Section 12 nor the Level 1 and 2 Levels of Non-Compliance in NERC Planning Standard III.A.M4.
065	5		Requirements section refers to Transmission Operator but the measurement section refers to Transmission Owner. Need to be consistent across all sections of this standard.
065	All		Still inconsistent with language i.e. Generation Owner Vs. Generator Operator? Which should be used? Seems like two completely different standards (Protection and Generation Control) seems they should be separate.
066	All	Standard Applicability, R1-1, M1-1	Change Transmission Owners to “Planning Authority, Transmission Planner and Transmission Owner” to match up with each section.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
066	3	R3-1	Eliminate “Transmission Operator” to match up with Applicability.
066			Refers to transmission control devices (e.g. phase shifting transformers, FACTS devices) – not relays.
068	All	Standard Applicability	Entities listed in Section 1 should be same as those listed in Section 3 and 4.
070	All		Language should be consistent by using Generator Owners or Generator Operators not both. Generator Owner is more consistent with NERC language.
070			Page 6-9, Section 2 and Section 3 is applicable to IV.A.M2 and IV.A.M3. I could not find any Planning Standard (M2 or M3) to compare this too. I searched all web sites and could not find anything about M2 or M3.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

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Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

- Be consistent in utilizing the term “Responsible Entity” in places to avoid repeating each entity. Some standards utilize this method while others spell out each entity throughout the standard.**
- Be consistent in how entities are listed in Standard Applicability. Some standards break it down by listing the section number and entities while others just list all the entities without reference to section number.**
- Avoid use of the term “entities responsible for the reliability of the interconnected transmission system” in the new standards and use the Functional Model entities.**
- No significant change in requirements from the old language; mostly formatting and changing from ‘region’ to ‘regional reliability council’.**
- Boilerplate language has been added to most standards; “...shall have evidence it provided...” This requires the transmission owner, etc. to ‘have evidence’ that it complied with the data reporting requirements. In the past ECAR compliance data has been transmitted by fax, e-mail, U.S. mail. Evidence could mean (a) keep a copy, (b) a receipt from ECAR or NERC, (c) a central log book of such transmissions, (d) something else.**
- The time allowed to respond to a NERC data request is sometimes in terms of days and sometime in business days.**

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

The Version 0 drafting Team must remember that a standard needs to be doable and the expense and risk to meet the standard must be justifiable by the benefits attained from meeting the standard. The standards are there to improve reliability with minimal risk of damage to the equipment needed to maintain reliability.