

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Karl Kohlrus		
Organization: City Water, Light & Power (Springfield, IL)		
Telephone: 217-321-1391		
Email: kkohlrus@cwlp.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 checked="" 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

NERC has changed directions several times over the past several years in trying to develop Planning and Operating Standards. The current process is confusing, labor intensive, slow and seemed to be going nowhere fast.

Finally, it seems that NERC is getting its act together and developing an ANSI certerfied set of standards and getting rid of the existing Operating Policies and Planning Standards. NERC and its stakeholders have their work cut out for them this year. But, finally, NERC has a plan for getting to an end product, a timeline, and a finish date.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: William F. Pope		
Organization: Gulf Power Company		
Telephone: 850-444-6449		
Email: wfpope@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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

I believe that we need to refine, not scrap, what we have been working on since 1996 with regard to the planning and operating standards. What needs to be done is to make sure that the operating and planning standards and compliance measures are meaningful with regard to actions that should be taken by utilities, RTOs, ISOs, control areas, etc. to maintain an acceptable level of reliability and prevent cascading outages.

Additional comments you have to improve the SAR:



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

See previous comment.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information	
Name: Alan Gale	
Organization: City of Tallahassee	
Telephone: (850) 891-3025	
Email: galea@talgov.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 checked="" 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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> Not Applicable	
<input type="checkbox"/> I represent Canada.	

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

The need for this action is clear.
It is imperative to get the "measures" correct.

We must not end up with ANY requirements buried in a reference document (similar to the implications made during the Control Area Questionnaires). If it is important enough to make it a requirement, it is important enough to make a measure against it, and not use a blanket statement such as "Has your system implemented all of the recommendations from the NERC publication on voltage stability entitled "Survey of the Voltage Collapse Phenomenon?"

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

Should Figure 1 (Standards Transition Overview) include additional information on the Urgent Action Cyber Standard? This was approved balloted in June '03 and implemented in August '03. Its one year status will expire before the end of the transition period. I do not believe the permanent standard (1300) will be finalized before Feb '05.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Carter B. Edge		
Organization: Southeastern Power Administration		
Telephone: 706-213-3863		
Email: cartere@sepa.doe.gov		
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
<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 checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support the development of clear, measureable reliability standards.

Additional comments you have to improve the SAR:

The detailed description of the SAR does not appear to recognize that there are board approved planning standards and Compliance Templates that did not receive adequate due process prior to approval and thus the technical content needs to be reevaluated, not just reformatted to fit into the new standards process. The SAR should clearly describe the direction planned to address the many concerns that have been communicated on those standards that have not been through a complete due process.



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

Many comments and concerns on Board Approved Operating Policies and Planning Standards have been developed and documented. The conversion to a Version 0 needs to consider those comments. For example:

- Grid reliability standards must take into consideration existing statutory and legal requirements where appropriate. The standards should allow for continued operation within the framework of these requirements until potential conflicts can be identified and resolved.
- Any testing performed for verifying Reactive Capability of generation units must be coordinated to assure nuclear plant licensing requirements are not violated.
- Requirements for generation model validation are considered justified, but testing in the WECC has shown that testing of all generation on the system is not necessary. Testing experience indicates 90% of the model improvements obtained by that testing could have been captured by appropriate model configuration control practices. Testing of individual units may be justified if other validation methods are ineffective, but blanket generator testing requirements are not supported by generation operators.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: John Horakh : 05-10-2004		
Organization: MAAC		
Telephone: 609-625-6014		
Email: john.horakh@conectiv.com		
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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

The existing reliability rules are contained in a confusing variety of documents, developed and approved at different times by different bodies. The rules are therefore stated in different formats. Also, the rules have been judged to be too non-specific as to application and measurement.

There is now significant hope that enabling federal legislation will be passed soon to allow mandatory compliance and sanctions to be applied to the rules. FERC has stated that it will "enforce" the rules prior to the legislation. However, enforcement requires specific rules in a common format. This can be achieved fairly quickly by developing "Version 0" reliability standards.

Additional comments you have to improve the SAR:

Although this appears to be a worthwhile effort, the additional work required for this effort, in addition to that required for continuing existing programs, may result in insufficient manpower available. The SAR should state that this work has a higher priority than other programs, in the event that choices in manpower allocation must be made.

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

The "Milestone" list (page 8 in the Transition Plan), and especially the "Task" list (pages 9-11 in the Transition Plan) would be much more understandable if shown in chart form.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Alan Johnson		
Organization: Mirant Corporation		
Telephone: (678) 579-3108		
Email: alan.r.johnson@mirant.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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input checked="" type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Mirant is supportive of the stated objectives as they are consistent with the need for NERC to promulgate a set of clear and complete reliability standards in a condensed period of time. Completion of the stated objectives should provide that clarity in the short-term. Additionally, they will set the foundation for the development/implementation of the sixteen reliability standards either under development or scheduled to be developed in the future (e.g. version 1).

Additional comments you have to improve the SAR:

Regarding item 3, under the section entitled "Detailed Description", propose that the SAR be modified to enable consideration to not only identifying sections of existing policies for potential NAESB development, but also to "packaging of the standards" to maximize ease of use. In other words, will the user need to go to a NERC standards book and a NAESB standards book to fully understand the requirements/expectations of a given standard? Will they cross reference each other? There are many ways this issue could be handled, and it should be addressed within the SAR process, before Version 0 is finalized.

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

Consistent with the response to question 1, would like to see the implementation plan modified to include the undertaking of a coordination effort with NAESB for the purpose of addressing the merger of reliability standards and their associated (if applicable) NAESB business practice into one document or package. In other words, think it will be a problem to require system operators and other users of NERC standards to look in multiple places to acquire all of the information to efficiently implement a reliability standard. It would be good to address this issue as part of the implementation plan if possible.



SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Roger Dale Green		
Organization: Southern Co. Electric Generators		
Telephone: 205.992.7603		
Email: rdgreenr@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 type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 - Federal, State, and Provincial Regulatory or other
<input type="checkbox"/> Not Applicable		Government Entities
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support the redirection of resources and manpower back to the existing Policies and Standards and using them as a baseline to develop Version 0. This will be a huge effort to meet the February 5, 2005 target date and will require significant commitment of resources from the industry.

Therefore, we suggest that the current effort of submitting and writing new SARS and standards under the Functional Model be suspended or at least minimized to avoid the dilution of the limited industry experts. Of course, Standards which are ready for Ballot voting should be continue through the approval process.

If our Company is like most, the normal day-to-day operations is enough work without additional committee and Standard Drafting team meetings.

Again, we support NERC's efforts with Version 0 and want it to be done correctly.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

There is a need for the Standard Drafting team to communicate to the Industry whether Standards currently being drafted as Version 1 and which are approved by the Ballot Body by the end of 2004 could be included in Version 0. There is confusion on what the transition process will allow.

There should be clear evidence on how current NERC policy within Version 0 will be enforced where there is not a Template or Standard covering the applicable section. Currently, there are no financial penalties associated with Policy violations.

If improvements to the current Templates in Version 0 need changes made to them between now and Ballot Body voting, the Version 0 SDT should consider accommodating these changes if they clearly improve the Standard and do not "postpone" the transition timeline.

Policy 3 currently does not include the Interchange Authority (IA) Entity as described in the Functional Model. However, Policy 3 must be transformed into the Functional Model paradigm. Entities who seek to register as the IA and perform the functions of the IA must be governed against some criteria. Currently, there is only the Functional Model to look to for guidance. As we know, the Functional Model is designed to only provide guidance and not governance. The Version 0 SDT will need to address this issue.

It is recommended that NERC consider the ability of the Ballot Body to ratify Version 0 by Topic sections vs. having one vote to ratify the entire Standard. This would allow prompt modifications to deficient sections of the Standard without jeopardizing the entire Standard.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Roman Carter		
Organization: Southern Co. Generation & Energy Marketing (SCGEM)		
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 type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input checked="" 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support the redirection of resources and manpower back to the existing Policies and Standards and using them as a baseline to develop Version 0. This will be a huge effort to meet the February 5, 2005 target date and will require significant commitment of resources from the industry.

Therefore, we suggest that the current effort of submitting and writing new SARs and standards under the Functional Model be suspended or at least minimized to avoid the dilution of the limited industry experts. Of course, Standards which are ready for Ballot voting should be continue through the approval process.

If our Company is like most, the normal day-to-day operations is enough work without additional committee and Standard Drafting team meetings.

Again, we support NERC's efforts with Version 0 and want it to be done correctly.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

There is a need for the Standard Drafting team to communicate to the Industry whether Standards currently being drafted as Version 1 and which are approved by the Ballot Body by the end of 2004 could be included in Version 0. There is confusion on what the transition process will allow.

There should be clear evidence on how current NERC policy within Version 0 will be enforced where there is not a Template or Standard covering the applicable section. Currently, there are no financial penalties associated with Policy violations.

If improvements to the current Templates in Version 0 need changes made to them between now and Ballot Body voting, the Version 0 SDT should consider accommodating these changes if they clearly improve the Standard AND do not "postpone" the transition timeline.

Policy 3 currently does not include the Interchange Authority (IA) Entity as described in the Functional Model. However, Policy 3 must be transformed into the Functional Model paradigm. Entities who seek to register as the IA and perform the functions of the IA must be governed against some criteria. Currently, there is only the Functional Model to look to for guidance. As we know, the Functional Model is designed to only provide guidance and not governance. The Version 0 SDT will need to address this issue.

It is recommended that NERC consider the ability of the the Ballot Body to ratify Version 0 by Topic sections vs. having one vote to ratify the entire Standard. This would allow prompt modifications to deficient sections of the Standard without jeopardizing the entire Standard.

The Transition to Version 0 needs to consider a "reconciliation" group to make sure that the Version 0, Functional Model and Certification standards are consistent among themselves.

The development of a document (reference) or whatever that can be used by the operators to really operate the system per the requirements is critically important and needs to be developed to provide some sort of seamless interpretation between NERC and NAESB documents during training and daily operation.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Marc Butts		
Organization: Southern Company Services, Transm. Plann. & Operations		
Telephone: 205-257-4839		
Email: mmbutts@southernco.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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support the redirection of resources and manpower back to the existing Policies and Standards and using them as a baseline to develop Version 0. This will be a huge effort to meet the February 5, 2005 target date and will require significant commitment of resources from the industry.

Therefore, we suggest that the current effort of submitting and writing new SARs and standards under the Functional Model be suspended or at least minimized to avoid the dilution of the limited industry experts. Of course, Standards which are ready for Ballot voting should be continue through the approval process.

If our Company is like most, the normal day-to-day operations is enough work without additional committee and Standard Drafting team meetings.

Again, we support NERC's efforts with Version 0 and want it to be done correctly.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

There is a need for the Standard Drafting team to communicate to the Industry whether Standards currently being drafted as Version 1 and which are approved by the Ballot Body by the end of 2004 could be included in Version 0. There is confusion on what the transition process will allow.

There should be clear evidence on how current NERC policy within Version 0 will be enforced where there is not a Template or Standard covering the applicable section. Currently, there are no financial penalties associated with Policy violations.

If improvements to the current Templates in Version 0 need changes made to them between now and Ballot Body voting, the Version 0 SDT should consider accommodating these changes if they clearly improve the Standard AND do not "postpone" the transition timeline.

Policy 3 currently does not include the Interchange Authority (IA) Entity as described in the Functional Model. However, Policy 3 must be transformed into the Functional Model paradigm. Entities who seek to register as the IA and perform the functions of the IA must be governed against some criteria. Currently, there is only the Functional Model to look to for guidance. As we know, the Functional Model is designed to only provide guidance and not governance. The Version 0 SDT will need to address this issue.

It is recommended that NERC consider the ability of the the Ballot Body to ratify Version 0 by Topic sections vs. having one vote to ratify the entire Standard. This would allow prompt modifications to deficient sections of the Standard without jeopardizing the entire Standard.

The Transition to Version 0 needs to consider a "reconciliation" group to make sure that the Version 0, Functional Model and Certification standards are consistent among themselves.

The development of a document (reference) or whatever that can be used by the operators to really operate the system per the requirements is critically important and needs to be developed to provide some sort of seamless interpretation between NERC and NAESB documents during training and daily operation.

The detailed description of the SAR does not appear to recognize that the Phase III planning standards did not receive adequate due process after field testing. Additionally, the Phase IV measurements have not yet been through field testing and due process. The technical content of both the Phase III and Phase IV standards needs to be reevaluated, not just reformatted to fit into the new Reliability Standards process. The SAR should clearly describe the direction planned to address the many concerns that have been communicated on those standards that have not been addressed.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Chris Schaeffer		
Organization: Duke Energy		
Telephone: 704 382-3658		
Email: ceschaef@duke-energy.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 type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 - Federal, State, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support the concept of clear, reasonable standards.

Additional comments you have to improve the SAR:

The detailed description of the SAR does not appear to recognize that there are board approved planning standards that did not receive adequate due process prior to approval and thus the technical content needs to be reevaluated, not just reformatted to fit into the new standards process. The SAR should clearly describe the direction planned to address the many concerns that have been communicated on those standards that have not been through a complete due process.



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

Many comments and concerns on generator related planning standards have been developed and documented by the SERC Generation Subcommittee and also from other regions. The conversion of the planning standards to a Version 0 needs to consider those comments. For example:

- Grid reliability standards must take into consideration nuclear plant licensing requirements where appropriate. These requirements are mandated by the federal government and enforced by the Nuclear Regulatory Commission.
- Any testing performed for verifying Reactive Capability of generation units must be coordinated to assure nuclear plant licensing requirements are not violated.
- Requirements for generation model validation are considered justified, but testing in the WECC has shown that testing of all generation on the system is not necessary. Testing experience indicates 90% of the model improvements obtained by that testing could have been captured by appropriate model configuration control practices. Testing of individual units may be justified if other validation methods are ineffective, but blanket generator testing requirements are not supported by generation operators.

If a guiding principal (#7) of this effort is to build the consensus of generation owner/operators in implementing the final standards, NERC should consider a generation subgroup under the planning subgroup discussed in the Project Management section of the Transition Plan to address the many concerns that were communicated by various regions during the initial roll out of the planning standards.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Ed Davis		
Organization: Entergy Services, Inc		
Telephone: 504-310-5884		
Email: edavis@entergy.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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>	
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Entergy supports this effort. Since the emergence of NAESB WEQ we have supported the writing of reliability standards. This Version 0 effort will provide some certainty and clarification to the industry about the new reliability standards, NAESB standards, and which is which. We also commend NERC for continuing to use the existing standards development process for this adoption.

Additional comments you have to improve the SAR:



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

None .

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: SERC EC Planning Standards Subcommittee, Darrell Pace, Alabama Electric Cooperative, Inc. (1) Brian Moss, Duke Power Company (1) Kham Vongkhamchanh, Entergy Services, Inc. (1) Clay Young, South Carolina Electric & Gas Company (3) Arthur E. Brown, South Carolina Public Service Authority (1) Bob Jones, Southern Company Services, Inc. (1) Byron Stewart, Tennessee Valley Authority (1) Pat Huntley, SERC Staff (2)		
Organization: SERC EC Planning Standards Subcommittee		
Telephone: Chairman-Bob Jones: (205)257-6148		
Email: rajones@southernco.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 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"/>	7 - Large Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	8 - Small Electricity End Users

<input type="checkbox"/> WECC <input type="checkbox"/> Not Applicable	<input type="checkbox"/>	9 - Federal, State, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support these general objectives of moving to one set of standards and one standards process.

Additional comments you have to improve the SAR:

The detailed description of the SAR does not appear to recognize that the Phase III Planning Standards did not receive adequate due process after field testing. Additionally, the Phase IV measurements have not yet been through field testing and due process. The technical content of both the Phase III and Phase IV standards needs to be reevaluated, not just reformatted to fit into the new Reliability Standards process. The SAR should clearly describe the direction planned to address the many concerns that have been communicated on those standards that have not been addressed.

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

The SERC EC Planning Standards Subcommittee is concerned that if all the Version 0 standards are balloted as one group, there may be some standards that are very controversial, and would jeopardize approval of the entire group. We suggest that consideration be given to breaking the standards into logical sub-groupings for balloting purposes.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Ralph Rufrano		
Organization: New York Power Authority		
Telephone: 914-681-6265		
Email: rufrano.r@nypa.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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

One way to speed up the process would be to put the existing Operating Policies and the Planning Standards directly for comments before adapting them to the Functional Model? In that way the discussion would be more on the Policies/Standards and less on the Functional Model aspect.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Guy V. Zito		
Organization: Northeast Power Coordinating Council		
Telephone: 212-840-1070		
Email: gzito@npcc.org		
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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

NPCC fully supports this effort and its objectives which are critical to maintaining reliability by creating a set of standards that are measurable, incorporate the functional model authorities with their associated designations and also have the business practices separated out from the reliability issues.

Additional comments you have to improve the SAR:



Question 2:

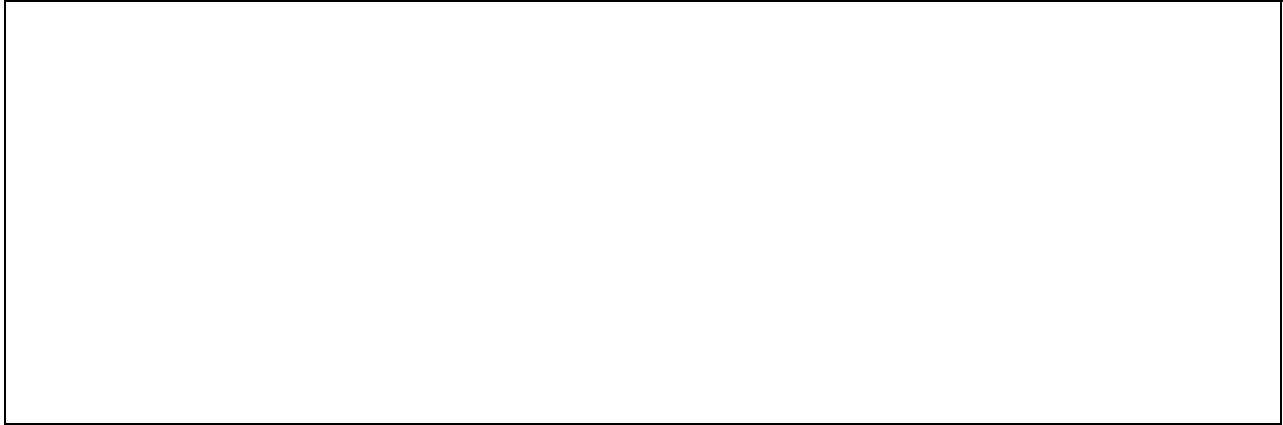
What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

NPCC hopes that the Version 0 standards and the Version 1 standards will be fully coordinated with each other such that Version 1 Standards already moving through the process will have similar attributes to the Version 0 Standards. It is not fully understood how these will be coordinated and how the parallel development of the standards will proceed. More clarification is needed.

NPCC also suggests utilizing the expertise of the CMC and the CCC for development of the compliance aspects of the Version 0 Stds. The drafting team should only be developing the expectations and metrics not the levels of compliance or sanctions. NPCC recommends this for efficiency and to expedite the process and adoption of the Stds.

Some NPCC members have expressed concern about potentially violating the ANSI approved RS process due to the urgent nature of implementation and Board approval/adoption and NPCC has conveyed to its members that every effort will be made to follow the steps outlined in the NERC RS Process Manual.

In addition, some members of NPCC have expressed concern over the seemingly "closed" process the under which the "Accelerating..Plan" was developed. NPCC questions the word "FINAL" appearing directly under the title on the first page. Members of NPCC have inquired what process was used to develop this Final as well as initial drafts of the document.



SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Mitch Needham, Kathy Davis, Jerry Wynne		
Organization: Tennessee Valley Authority - Trans./Power Supply		
Telephone: (423) 751-6013		
Email: meneedham@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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>	
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

It is very important to establish the "set of reliability standards" as referenced in item 1. There is confusion as to whether the intent is to create one umbrella standard which covers all of the existing policies and standards. Statement 1 is clear to TVA that this is not the intent. The SAR and Standard Drafting Teams will face difficulty in the fact that many of the policies in effect contain guidelines rather than hard and fast rules. Should any of these guidelines become rules, the industry must be given ample opportunity to reflect and comment, making consensus more difficult.

Statement 2 implies industry acceptance of the Functional Model. It is our experience that the functional model has changed, and extreme care must be taken to allow entities to determine their own organizational structure, and not require significant standard rewrites should the FM undergo additional revision.

Statement 3 is reasonable, but again there may be differences among entities as to what constitutes a 'business practice' versus a 'reliability objective'.

Statement 4 should be part of the overall process, and the approval of a new reliability standard built on an existing policy or standard should immediately supercede the existing policy or standard.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

It is TVA's opinion that this plan is extremely aggressive, given the amount of work to be done. A different approach might be to take one existing policy or standard, go through the conversion process, then see where efficiencies could be gained. We would expect that, for example, selecting one operating policy and one planning standard should indicate to NERC and the industry at large how willing the industry is to support this effort.

One additional possibility would be to hire a consulting firm to make an attempt at one policy/standard. It will be difficult to field an appropriate SAR/Standard drafting team given the magnitude of work in this area. The industry leaders that should be involved likely won't be able to provide the time resource to make this rapid approach reasonable.



SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Alan Adamson		
Organization: New York State Reliability Council		
Telephone: (518) 355-1937		
Email: aadamson@nycap.rr.com		
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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

The New York State Reliability Council (NYSRC) generally supports the objectives of the SAR. We agree with the views expressed by the U.S./Canada Power System Outage Task Force and FERC that adoption of enforceable standards must be accelerated. The present SAR process is too complex and overly time consuming for stakeholders, and as a result, progress towards developing new standards has been extremely slow. However, we are concerned as to whether the translation process described in this SAR will be conducted in a truly open process, such that NERC seriously considers and implements comments and input from its stakeholders. For example, although Question #2 asks for comments regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards", the cover of the document contains the word "Final". Further, there is no schedule in the Plan for revising that document. We are also concerned that, unless there is a fully open process, the translation process could lead to weakening of the existing standards as a result of removing critical portions of the existing rules, as permitted by the current version of the Plan document. Moreover, as a result of a NERC effort to adopt the Version 0 standards as quickly as possible, the scheduled period for reviewing and commenting on draft Version 0 standards is much too short.

Additional comments you have to improve the SAR:

The SAR should state that the translation process WILL NOT result in weaker Version 0 standards than in the existing reliability rules. Additional comments can be found under Question #2.

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

1. Although the comment form asks for comments and suggestions regarding the Plan document, we are concerned that the title page includes the word "Final" under its title. We therefore hope that NERC does not consider the Plan document, dated 4/19/04, as really "final", and strongly urge NERC to revise the document in accordance with comments received.
2. General comment: Unfortunately, other than the implementation schedule, the Plan document contains very little detail on the Version 0 development process as to how the Version 0 standards draft will be presented for comment. Many of the comments below suggest areas where additional detail is needed.
3. The Plan should say that any "Version 1" standards that are successfully balloted in 2004 will not replace the Version 0 standards until after Version 0 is adopted by the BOT.
4. Guiding Principle #6 describes a mapping of the translation process that will show how the existing reliability rules are translated into the Version 0 standards. This information should also include an explanation of the reasons the drafting team has decided to omit a particular portion of an existing rule when it develops a proposed Version 0 standard.
5. The implementation schedule shows a 28-day comment period for the first draft of Version 0 and 46 days for the second draft. The scheduled comment period for the first draft, in particular, is not nearly sufficient. Comment periods for "Version 1" standards have normally allowed four to six weeks. This latter review period applies to only one standard, whereas, there will be a significant number of Version 0 standards to review. From the Comment #4 discussion, the translation process is more than merely adopting existing rules tit-for-tat, it will involve reviewing the rule translation mapping process.
6. There is nothing in the Plan document as to whether sanction matrices will be included in the Version 0 standards.
7. It is not clear in the Plan document whether the Version 0 standards will be balloted individually or as a group.
8. There are only four weeks scheduled between completion of the first and second ballots. Four weeks is not sufficient time to redraft the standards (if Version 0 is defeated on the first ballot) and then allow enough time for the Ballot Body to review the revised standards and vote.
9. The SAR states that there are 9 operating policies and 48 planning standards that are to be translated into Version 0 standards. NERC has had a program of field testing and revising its standards. Have all the policies and standards that are intended to be translated gone through this an open review process and had final approval by the BOT?
10. The title and brief description of each of the existing operating policies, planning standards, and compliance templates to be used for developing the Version 0 standards should be included in an appendix. A link to the NERC web site to view these rules would also be useful.
11. There is no milestone date shown for revising and re-issuing the Plan document (see Comment #1).

12. Comment on the ANSI or SAR process for developing Version 1 standards: Development of the Version 0 standards does nothing to reduce or eliminate the complexities of the SAR process (cited by NERC as a reason for developing the Version 0 standards), even when used in the future to replace the Version 0 standards. There should be a separate NERC effort to streamline that process.

13. Finally, NERC should recognize that the Plan document should not only be intended as a drafting team resource, but also as a reference document for the stakeholders that will ultimately review and comment on the standards.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Gerald Rheault		
Organization: Manitoba Hydro		
Telephone: 204-487-5423		
Email: 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 checked="" 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, and Provincial Regulatory or other
<input type="checkbox"/> WECC	<input type="checkbox"/>	Government Entities
<input type="checkbox"/> Not Applicable		
<input checked="" type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Manitoba Hydro supports the objectives as stated above with reservations. The process to be undertaken is being presented as a relatively straightforward process which can be completed in a short period of time. Manitoba Hydro believes that this will not necessarily be the case for the following reasons:

1. The intent, as stated in 1) above, is that the work of translating all existing material into the new format will simply be an exercise of cut and paste of existing Planning Standards and Operating Policies into a set of Reliability Standards. However the reality is that the context for the words changes when this cut and paste process is done, and as a result, the interpretation of the words may change, resulting in the need for discussion and further revision.

2. Development of compliance material for these new Standards will be time consuming. The amount of work involved in developing compliance requirements for these Standards will be difficult, as can be attested by any Standard Drafting Team involved in the Version 1 Standards.

3. There is a great risk that in this exercise, some standards will be rejected because they are unnecessary, contradictory, lacking in benefit, high in cost, or impossible to implement in the time frames implied. Hence, there may have to be provision for more than one ballot and for more consultation with the industry.

4. Manitoba Hydro is quite concerned that some of the material being translated has never been examined in any meaningful way, yet it seems all previous NERC material is to be treated as having equivalent credibility and value. The planning standards which were developed over the last five years have been recognized as being deficient and needing improvement yet these are

the documents which are to be cut and pasted into Version 0. The end result may be that many of the new standards will have major deficiencies and will not be supported by the industry

5. The proposed approval process is contrary to the process defined in the ANSI Standards development process. This may become very important if financial penalties are attached to the compliance process related to these standards.

6. It is essential that a wide range of very experienced people be involved in the process to ensure that high quality documents are produced. The schedule assumes an idealistic world where there will be minimal disagreement on technical issues. The experience of Manitoba Hydro staff who have been members of SDT for Standards 200 and 600 is that this is not likely to be the case. The amount of time required to ensure that the wording used in the standard is as clear as possible to minimize the opportunities for interpretation and confusion and to maximize clarity. The discussion by the drafting teams has peeled back the layers on several topics and revealed a lot of confusion, multiple interpretations and errors in the existing standards.

7. A good set of standards requires input from all aspects of the industry. If such input is minimized at the early stages of the process, it will come later when it may be more difficult to accommodate or will have more impact on idealistic schedules (such as rejection later rather than modification now).

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

The time requirement at our organization to monitor and address the new version 1 standards as they were rolled out to the industry in the last 18 months was quite substantial and added significant workload to many of our staff in strategic areas of the organization. By introducing a new parallel path (version 0) in this process, NERC has increased the time demands for these staff to the point that we may not be able to thoroughly review these standards documents and provide timely and useful comments.

Many other organizations both in Canada and the US have similar problems. Therefore we are concerned that this may result in these new Version 0 standards being adopted in a format that will cause much problems to the industry without substantially increasing the reliability of the north american bulk electric network. However, even if Manitoba Hydro has concerns relative to the development of Version 0 standards, we have a staff member on the Standards Drafting Team and intend to devote all available resources to reviewing and commenting on these standards. We urge all other industry entities to do likewise.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Ed Riley		
Organization: California ISO		
Telephone: 916.351.4463		
Email: eriley@caiso.com		
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, and Provincial Regulatory or other Government Entities
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

The California ISO strongly supports this effort.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

The CAISO feels that there is a potential for conflict and error if the Version "0" Standards are used to "clarify", or, interpret the existing standards. If there is confusion as to the intent of a particular Standard or requirement, we feel that it should be clarified through the SAR process, not through the Version "0" process.

There should be no new requirements that were not in the policies already. Each standard should be accompanied by all reference materials, as attachments to each standard.



SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Linda Campbell, Patti Metro, Roger Westphal, Joe Krupar, Eric Grant, Bob Remley, Wayne Lewis, Ben Sharma		
Organization: FRCC		
Telephone: (813) 289-5644		
Email: pmetro@frcc.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 checked="" 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>	
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We support the objectives of this SAR because it is important to develop a consistent format for Reliability Standards. One set of Reliability Standards from which the industry can move forward will allow the flexibility to make necessary improvements and changes. It will also reduce the confusion on the process for implementing changes and reduce the duplication of efforts required to maintain the existing reliability rules.

Additional comments you have to improve the SAR:

The SAR needs to describe the mapping process to be used in converting from existing “reliability rules” to the new Version 0 Reliability Standards so the industry is comfortable with the transition process.



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

In order for the Version 0 Reliability Standards process to be successful, the drafting team must be provided instructions that emphasize the need to convert the existing "reliability rules" described in the SAR without incorporating changes to the existing rules. We believe the Version 0 Reliability Standards should not force specific quantifiable measurements where there are not any currently and where a restatement of the standard is all that is reasonable at this time. If changes are made to the existing measures, it could jeopardize the timely completion of the process and has the potential to affect the ability of the industry to continue the self-development of Reliability Standards. If the industry from compliance audits finds that industry participants need specific quantifiable measurements due to extreme unreasonable interpretations, the standard measurements can be changed in the first revision of the Version 0 Reliability Standards.



SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Roger Champagne		
Organization: Hydro-Québec TransÉnergie		
Telephone: 514-289-2211, ext. 2766		
Email: champagne.roger.2@hydro.qc.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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input checked="" type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Hydro-Québec TransÉnergie (HQTÉ) fully supports this effort and its objectives which are critical to maintaining reliability by creating a set of standards that are measurable, incorporate the functional model authorities with their associated designations and also have the business practices separated out from the reliability issues.

Additional comments you have to improve the SAR:



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

HQTE recommends that the Version 0 standards and the Version 1 standards be fully coordinated with each other such that Version 1 Standards already moving through the process will have similar attributes to the Version 0 Standards. It is not fully understood how these will be coordinated and how the parallel development of the standards will proceed. More clarification is needed.

HQTE also suggests utilizing the expertise of the CMC and the CCC for development of the compliance aspects of the Version 0 Stds. The drafting team should only be developing the expectations and metrics not the levels of compliance or sanctions. HQTE recommends this for efficiency and to expedite the process and adoption of the Standards.

HQTE is in favor of an "Accelerated Plan" to speed up the process of adopting the Version "0" Standards. However, that plan must respect the ANSI-accredited process.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: David Kiguel		
Organization: Hydro One Networks Inc.		
Telephone: 416-345-5313		
Email: David.Kiguel@HydroOne.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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> Not Applicable		
<input checked="" type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Hydro One Networks Inc. fully supports this effort and its objectives. Creating a set of standards that are measureable, incorporate the functional model authorities with their associated designations and also have the business practices separated out from the reliability issues is critical to maintaining reliability of the electricity System.

Additional comments you have to improve the SAR:



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

We recommend that the Version 0 standards and the Version 1 standards be fully coordinated with each other such that Version 1 Standards already moving through the process will have similar attributes to the Version 0 Standards. It is not fully understood how these will be coordinated and how the parallel development of the standards will proceed. More clarification is needed.

Hydro One Networks also suggests utilizing the expertise of the CMC and the CCC for the development of the compliance aspects of the Version 0 Standards. The drafting team should only be developing the expectations and metrics not the levels of compliance or sanctions. We recommend this for efficiency and to expedite the process and adoption of the Standards.

Hydro One Networks is in favor of an "Accelerated Plan" to speed up the process of adopting the Version 0 Standards. However, that plan must respect the ANSI-accredited process.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Khaqan Khan		
Organization: Independent Electricity Market Operator (IMO)		
Telephone: 905-855-6288		
Email: khaqan.khan@theIMO.com		
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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> Not Applicable		
<input checked="" type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

We fully support the NERC plan for the developemnt of Version 0 Reliability Standards.

With regards to item 4 of Question 1 above, it is our opinion that the development and implementation of "NERC reference documents" should be coincident with development and implementation of "Version 0 reliability Standards".

Additional comments you have to improve the SAR:



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

We also support the comments developed by ISO/RT0 Council- Standards Review Committee.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Kathleen Goodman		
Organization: ISO New England Inc.		
Telephone: (413) 535-4111		
Email: kgoodman@iso-ne.com		
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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

The ISO council supports the objectives of this SAR that move the existing policies/standards/templates into a consistent and measurable format.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

The ISO would like to ensure that the Version 0 standards and the Version 1 standards will be coordinated with each other such that Version 1 Standards already moving through the process will have similar attributes to the Version 0 Standards. It is important that the parties involved with the Version 1 process are fully aware of the efforts being taken in the development of the Version 0 standards.

ISO-NE would also like to ensure that no additional criteria are introduced into the Version 0 process that are not currently in the existing policy/standards/templates. As this process goes forward, enhancements to the current policy/standards/templates should be captured and addressed following completion of the Version 0 process.

ISO-NE agrees with the use of Reference Documents to capture material that did not transition to the Version 0 Standards. However, Reference Documents need to be available coincident with the Version 0 approval process.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Karl Tammar - Chair		
Organization: ISO/RTO Council - Standards Review Committee		
Telephone: 518-356-6205		
Email: ktammar@nyiso.com		
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, and Provincial Regulatory or other
<input type="checkbox"/> WECC	<input type="checkbox"/>	Government Entities
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

The ISO/RTO Council supports the objectives of this SAR that move the existing policies/standards/templates in the a consistent and measurable format.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

The ISOs/RTOs would like to ensure that the Version 0 standards and the Version 1 standards will be coordinated with each other such that Version 1 Standards already moving through the process will have similar attributes to the Version 0 Standards. It is important that the parties involved with the Version 1 process are fully aware of the efforts being taken in the development of the Version 0 standards.

The group would also like to ensure that no additional criteria are introduced into the Version 0 process that are not currently in the existing policy/standards/templates. As this process goes forward enhancements to the current policy/standards/templates should be captured and addressed following completion of the Version 0 process.

The Council agrees with the use of Reference Documents to capture material that did not transition to the Version 0 Standards. However, Reference Documents need to be available coincident with the Version 0 approval process.

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: MAPP		
Organization: Mid-Continent Area Power Pool		
Telephone: 651-632-8400		
Email: mapp.org		
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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

MAPP supports these objectives as being the underpinings for the type of response that NERC must make to the FERC April 14, 2004 Order that "states a policy objective addressing 'the need to expeditiously modify [NERC] reliability standards in order to make these standards clear and enforceable.'

Nonetheless MAPP has several concerns.

First, MAPP is concerned that the effort to accelerate the implementation of new standards into a "clear and enforceable" format may result in a failure to properly reflect regional differences with standards that cannot be overcome merely by statement but which would require significant additional investment and/or operation and maintenance or that would require practices in a certain region to be adopted that do not make sense. NERC must ensure that the accelerated process will not short circuit regional differences which are appropriate and that make sense.

Second, MAPP is concerned that the schedule is so accelerated that it may result in defeating the democratic elements that have been put in place in the new NERC standards making process. The accelerated schedule will result in members of the drafting team spending most of their time for a number of months on nothing but the drafting of NERC standards. How can most market participants whose employees have multiple responsibilities offer to participate on such an extensive effort? If a cross section of the industry is not represented on the drafting team, how can the resultant standards be truly fair and democratic? If all regions are not represented on the drafting team, how can the the resultant standards properly reflect regional differences? If the process is so accelerated that it is difficult for average market participants to provide members for the drafting team, how can NERC be sure that the standards that are generated are error free and do not

result in application problems in certain areas of NERC?

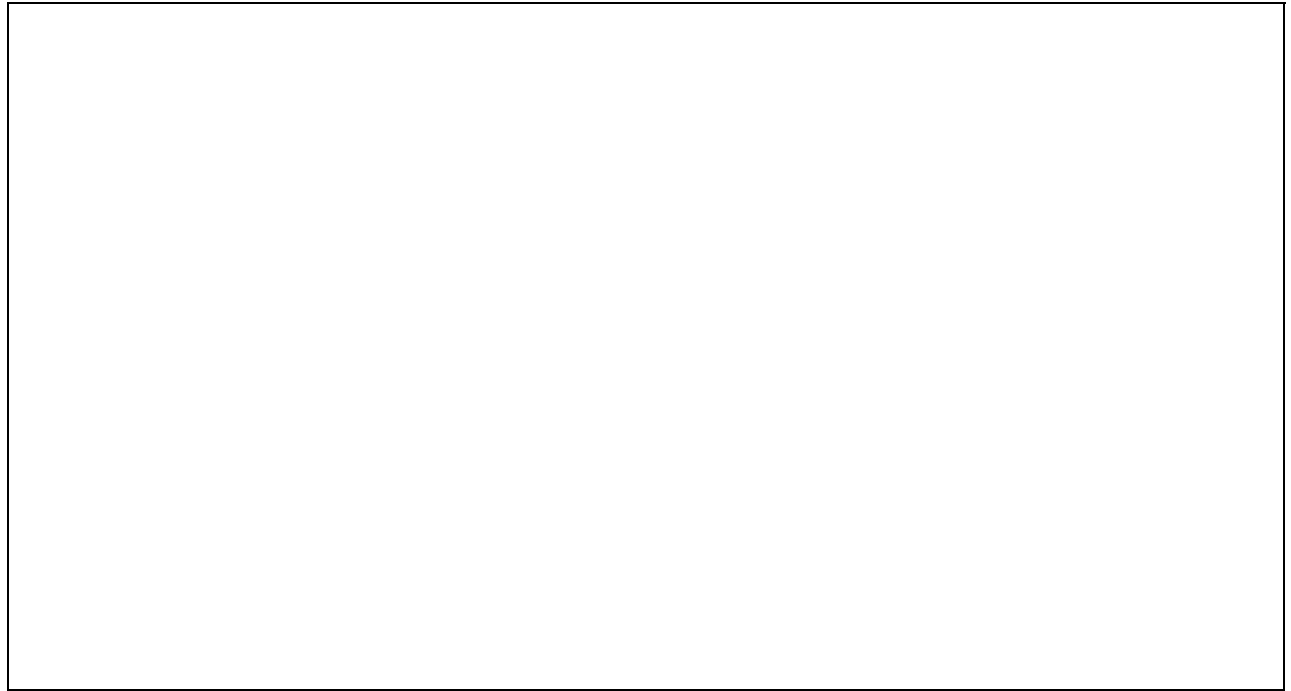
Third, MAPP is concerned that the schedule calls for shortened comment periods that do not allow for the development of regional comments. MAPP's working groups or subcommittees develop initial regional comments on NERC standards. These initial drafts are then distributed to MAPP members for comment before submitting to NERC as regional comments. Typically it takes quite an effort for MAPP to complete the development of regional comments within the normal NERC 45 day comment period. Yet, the schedule provided in the attached plan calls for some 30 day comment periods. MAPP asks that the schedule be modified so that all comment periods in the schedule are for a minimum of 45 days.

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

1. In order to ensure the democratic elements of the new NERC standards making process is maintained, MAPP asks NERC to ensure that, if at all possible, NERC provide for representatives from all industry sectors and all regions on the drafting team.
2. Provide a description of how regional differences will be reflected into the final set of standards. Explain how FERC's order for clear and enforceable standards can be accommodated with the adoption of regional differences.
3. Add provisions to the plan for ensuring that democratic elements of the new NERC standards making process is maintained, including, adding a provision that the schedule can be extended if comments are such that the set of draft standards are not ready to be voted on, adding a provision that if a particular standard needs additional work that such a standard can be held out and worked on during an additional period and refined until it is ready to be voted on by the ballot body, adding a provision that if a market sector or region is not adequately represented on the drafting team that if representatives of that sector or region attends a particular drafting team meeting that the representatives of the sector or region will be allowed to vote on drafting team decisions even though that these representatives are not official members of the drafting team, etc. Further, MAPP asks that a provision be added that if there are not representatives of every industry sector or region on the initial drafting team, that after the first draft and before the second draft, a second nominating period be provided for in which representatives of the missing industry sector or region be allowed to self-nominate and add a representative to the drafting team.
4. The minimum comment periods for standard drafts and procedure drafts should be 45 days. Change the schedule so that all 30 day comment periods are extended to at least 45 days.



SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Therese Kuehneman		
Organization: SRP		
Telephone: 602-236-4392		
Email: tmkuehne		
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 type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, and Provincial Regulatory or other Government Entities
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Gerry Burrows - Kansas City Power & Light Bill Nolte - Sunflower Electric Noman Williams - Sunflower Electric Robert Rhodes - Southwest Power Pool		
Organization: Operating Reliability Working Group, Southwest Power Pool		
Telephone: 501-614-3241		
Email: rrrhodes@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 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, and Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable	<input type="checkbox"/>	
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Going to Version 0 puts everything in a common format which minimizes confusion during the process.

Additional comments you have to improve the SAR:

It would appear that the decision to proceed with the Version 0 Reliability Standards has already been made when one considers the plan of action and what has already been done prior to approval of the SAR.



Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

General comments:

Guiding Principle 2 of the Plan indicates that no new requirements will be developed during the transition to Version 0 standards. We wholeheartedly support this position and are concerned that it may not be adhered to throughout this process.

While the project is a worthwhile effort and needs to be implemented, it includes an overly ambitious schedule that will be extremely difficult to maintain.

One of the reasons given for the Version 0 concept is the ambiguity of current operating policies and planning standards. Given this situation, is it reasonable to expect to be able to reach consensus on Version 0 standards in a timely manner?

Specific comments:

There was no direct indication of diverse stakeholder participation on the drafting team.

In the rush to complete this project we must be very careful in trying to make one size fit all concerning the standards. What is good for one may not be good for another, especially when smaller entities are involved.

With the fast-track schedule, time allowed for preparing drafts and comment periods have been cut to the bare minimum and could have a detrimental impact on the overall quality of the effort and acceptance of the new standards.

On page 7 in the Plan, it is mentioned that "no additional revisions" will be allowed once the standards reach the committee and ballot pool level, yet on page 11 in the Implementation Schedule a task has been included for a recirculation ballot. This appears to be in direct conflict. Also, in several places throughout the Plan, the deadline for comments is given as May 17 when in actuality it is May 19. These are the kind of mistakes that can be made when a process is rushed to completion. These types of errors could be detrimental in this process.

Additional detail on the balloting process would be helpful. Will voting be on the package as a whole or on individual standards? And what happens if a standard is not approved?

SAR Comment Form for Proposed Version 0 Reliability Standards

This form is to be used to submit comments on the SAR proposing the development of Version 0 Reliability Standards and the associated “Plan for Accelerating the Adoption of NERC Reliability Standards.”

These files may be downloaded at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Version-0-SAR-0101.pdf.

You may submit a completed comment form through May 19, 2004 to sarcomm@nerc.com with the words “SAR Comments” in the subject line.

If you have questions please contact Gerry Cauley at Gerry.Cauley@nerc.net.

SAR Commenter Information		
Name: Paul Arnold, Marv Landauer, Deanna Phillips, Rebecca Berdahl, Kathy Craig		
Organization: Bonneville Power Administration		
Telephone: 503-230-3859		
Email: kocraig@bpa.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 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, and Provincial Regulatory or other Government Entities
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> Not Applicable		
<input type="checkbox"/> I represent Canada.		

Question 1:

Do you support the objectives of the SAR as stated below?

1. Translate the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 being balloted in April 2004 – into an initial baseline (Version 0) set of reliability standards.
2. Identify the Functional Model designation for each performance requirement and measure in the Version 0 standards.
3. Identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into their equivalent “Version 0” business practice standards.
4. Retire existing NERC operating policies, planning standards and compliance templates coincident with adoption of the Version 0 standards. Material that is not part of Version 0 standards will be made into NERC reference documents or NAESB business practices, or dropped if not needed.

Yes, I support these objectives.

No, I do not support these objectives.

Comments describing your reasons for supporting or not supporting the objectives of the SAR:

Additional comments you have to improve the SAR:

Question 2:

What comments and suggestions for improvement do you have regarding the "Plan for Accelerating the Adoption of NERC Reliability Standards"?

BPA supports the stated objective of the SAR and supplies the following comments and questions for consideration:

(1) The NERC Board recently approved the recommendations of the Control Area Criteria Task Force (CCTF) including the Implementation Plan for the 38 templates, and follow-up assignments for Additional Standards. It is clear from the SAR description that the 38 templates will be included in the Version 0 standards. However, it is not clear how new requirements for operating reserves, reactive reserves and voltage control, system monitoring and tools used by the system operator, or cyber security actions will be addressed in Version 0. If these requirements are critical for reliability, it seems taking a year to develop Version 0 and putting implementation of other critical issues on hold may be too long to wait. BPA suggests allowances be made in this process to enable development of those new standards as necessary to implement these recommendations and improve the power system reliability.

(2) Will the Version 0 standards include any existing or new provisions for regional differences? If there are regional differences addressed in the current or pending standards and policies, it would seem reasonable that these differences should be recognized in Version 0.

Also, since the 38 compliance templates may have caused some regions to realize that they may have interpreted or implemented existing standards differently, it may be appropriate to entertain regional differences in development of the Version 0 standards. Examples where the compliance templates have created an awareness that regions are doing things differently, is P9T1, P9T2, P9T3, and P9T4 regarding the accountability of the Reliability Coordinator to run studies. Currently, not all Reliability Coordinators are staffed with the expertise to run studies. Nor do they have the necessary tools to perform such studies. However, this does not mean that their operation doesn't meet the underlying requirements for knowing the operational limits of the transmission system. The study tools that are required depend on off line study capability tools such as dynamic stability analysis that are not currently available on-line. Therefore, in these cases, the responsibility for performing studies and establishing procedures is left to the utilities and the regional council to determine safe operating limits and provide necessary information to the Security Coordinator. The NERC planning templates may create similar opportunities to identify regional differences.

Perhaps one way to determine whether regional differences are acceptable and reasonable is to form a technical body at NERC that could determine if a proposed regional difference meets the reliability need that is addressed by the standard, and whether given regional conditions, it is technically equal or better than the NERC standard. If the region and technical body cannot reach Agreement on an equal or better standard, then the region could appeal to an appellate body, possibly to the NERC BOT, to establish a regional difference in the standard.

(3) We assume that Version 0 standards will enable adoption of the Version 1 Standards that have already been identified (ie Coordinate Operations, Operate within Interconnection Reliability Operating Limits, etc). Is this a correct assumption?

(4) Guiding Principle No. 8 states "All stakeholders are strongly encouraged to provide inputs early in the transition, especially during the public comment period for the SAR and draft Version 0 standards. Because of

the complexity of the project, no additional revisions will be permitted once the Version 0 standards are posted for committee and ballot pool approval." This principle seems to be a little harsh. BPA understands past problems of commenter's waiting until the standards go to ballot to review and comment, and we support the request for "input early in the transition". However, to state "no additional revisions will be permitted..." places the Drafting Team at a disadvantage by not providing an additional review for completeness and providing an opportunity to revise the standard if necessary. BPA recommends an additional short window to review and comment prior to the standards going to committee and the ballot pool be provided. If this opportunity is not provided, the only recourse the industry will have to correct an oversight is the vote down the standard, which defeats the stated objective of the Accelerated Standards Transition.

(5) Under Purpose/Industry Need Nos. 2 and 3 both state development of "enforceable" standards. Please clarify what is meant by the term "enforceable"?

(6) Please clarify the impact that this Version 0 Standard conversion process will have upon the NERC Glossary, White Papers, and all other NERC Reference Documents. Do these documents contain any "standard" or "measurements" that should also be incorporated into the Version 0 work being performed? Also, will these documents be incorporated into the reference materials being developed through this Version 0 conversion process?

