

## Version 0 SAR Consideration of Comments

Organization	Contact	Segment	Canada	Do you support the SAR objectives?	
				Yes	No
BPA	Paul Arnold	1		X	
CA-ISO	Ed Riley	2		X	
City of Springfield IL	Karl Kohlrus	5		X	
City of Tallahassee	Alan Gale	5		X	
Duke Energy	Chris Schaeffer	5		X	
Entergy	Ed Davis	1		X	
FRCC	Linda Campbell	1, 2, 3, 5		X	
Gulf Power Co	William Pope	3			X
Hydro One	David Kiguel	1,3	X	X	
IMO	Khaqan Khan	2	X	X	
IRC	Karl Tammar	2		X	
ISO-NE	Kathleen Goodman	2		X	
KCP&L/ORWG	Gerry Burrows	1, 2		X	
MAAC (Connective)	John Horakh	2		X	
Manitoba Hydro	Gerald Rheault	1, 3, 5, 6	X	X	
MAPP	Lloyd Linke	2		X	
Mirant	Alan Johnson	6		X	
NPCC	Guy Zito	2		X	
NYPA	Ralph Rufrano	1		X	
NYS Reliability Council	Alan Adamson	2		X	
SERC EC	Bob Jones	1, 2, 3		X	
Southeastern PA	Carter Edge	4, 5		X	
Southern Company	Marc Butts	1		X	
Southern Company	Roman Carter	6		X	
Southern Company	Roger Green	5		X	
SRP	Therese Kuehneman	1, 3		X	
TransEnergie	Roger Champagne	1	X	X	
TVA	Mitch Needham	1		X	
<b>TOTAL</b>				<b>27</b>	<b>1</b>

## Response to Comments

Commenter	Comment	Response to Comments
G. Burrows	Going to Version 0 puts everything in a common format which minimizes confusion during the process.	
G. Burrows	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.	In order to meet the aggressive timetable, work has begun on Version 0 standards. However, the SAC established a checkpoint to determine if the project should go forward prior to the NERC Board meeting on June 15. The comments on this SAR are the primary input for that recommendation.
G. Burrows	<p>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.</p> <p>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.</p> <p>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?</p> <p>Specific comments:</p> <p>There was no direct indication of diverse stakeholder participation on the drafting team.</p> <p>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.</p> <p>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.</p>	<p>The Drafting Team has been directed to not include new requirements. Ultimately the success of the balloting of Version 0 standards rests on the approach of ‘no new requirements’.</p> <p>The schedule is aggressive but doable if carefully managed. Progress to date is on track with the plan.</p> <p>The SAC has appointed a drafting team based on an open nominations process and established the greatest diversity possible from the names submitted. The team represents all regions and Canada, and each segment that provided a nomination was included.</p> <p>‘One size fits all’ should not be a concern because no new requirements are being introduced.</p> <p>Quality is a concern given the fast</p>

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	<p>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.</p> <p>Additional detail on the balloting process would help. Will voting be on the package as a whole or on individual standards? And what happens if a standard is not approved?</p>	<p>schedule and will be closely monitored by the SAC.</p> <p>A recirculation ballot does not imply the standards will be modified. In fact, the process manual precludes that. Recirculation means that the second ballot will include comments from the first ballot and how those comments were resolved.</p> <p>The schedule in the plan remains, but not every date will be hit precisely. The SAR was scheduled for posting so as to have the 30 day period end on May 17. It was posted 2 days late and the closing date was May 19. The plan was still correct – it is the plan. It would not be helpful to rewrite the plan every time a milestone was completed on a different date than scheduled.</p>
MAPP	<p>MAPP supports these objectives as being the underpinnings 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.'</p> <p>Nonetheless MAPP has several concerns.</p> <p>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.</p>	<p>Existing regional waivers will be carried forward as regional differences. There is a section on Regional Differences in the template being used for the Version 0 standards. There will be no new regional differences introduced and all existing regional differences (waivers) will be retained intact.</p> <p>The SAC is committed to the full ANSI-accredited process in developing and approving Version 0 standards. Industry will have two comment periods, one for 30 days and one for 45 days, plus an</p>

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	<p>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 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?</p> <p>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.</p>	<p>opportunity to vote on the standards. All regions are represented on the drafting team, and the SAC maximized diversity across segments with the nominations that were received.</p> <p>The fact that the existing reliability rules are to be translated into Version 0, with no changes to the requirements should help to expedite the review and comment process – the question is whether the Version 0 requirements are a good translation, not whether the requirements need to be changed.</p>
MAPP	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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</li> </ol>	<p>The SAC maximized diversity across segments from the available nominees and ensured all ten regions were represented.</p> <p>Regional differences currently approved as waivers to operating policies and planning standards will remain exactly as they are. No new regional differences will be introduced, since the reliability requirements are not changing.</p>

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	<p>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.</p> <p>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.</p>	<p>The SAC is using the ANSI-accredited process to ensure full due process.</p> <p>Drafting team meetings are open and active participation is encouraged. The drafting team will perform very little formal voting, if any. Voting is limited to members, but observers are encouraged to participate in the discussion.</p> <p>The initial 30-day period is a preliminary comment period. The 45-day posting beginning on August 30 conforms to the standards process manual. The SAC believes these two periods will be sufficient, but can modify the schedule in the future if there is a need for further comment to reach consensus on the Version 0 standards.</p>
IRC	The ISO/RTO Council supports the objectives of this SAR that move the existing policies/standards/templates in the a consistent and measurable format.	
IRC	<p>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.</p> <p>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.</p> <p>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</p>	<p>Version 1 standards will be adjusted to align with and become replacements for relevant sections of the Version 0 standards. Version 1 drafting teams are being briefed.</p> <p>No new requirements will be permitted.</p> <p>The Operating and Planning Committees will be requested in July to develop reference documents to complement the Version 0 standards.</p>

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	available coincident with the Version 0 approval process.	
ISO-NE	The ISO council supports the objectives of this SAR that move the existing policies/standards/templates into a consistent and measurable format.	See response to IRC.
ISO-NE	<p>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.</p> <p>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.</p> <p>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.</p>	See response to IRC.
IMO	<p>We fully support the NERC plan for the development of Version 0 Reliability Standards.</p> <p>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".</p>	The Operating and Planning Committees will be requested in July to develop reference documents to complement the Version 0 standards.
IMO	We also support the comments developed by ISO/RTO Council- Standards Review Committee.	
Hydro One	Hydro One Networks Inc. fully supports this effort and its objectives. 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 is critical to maintaining reliability of the electricity System.	
Hydro One	<p>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.</p> <p>Hydro One Networks also suggests utilizing the expertise of the CMC and the CCC for</p>	<p>Version 1 standards will be adjusted to align with and become replacements for relevant sections of the Version 0 standards. Version 1 drafting teams are being briefed.</p> <p>The drafting team will only be</p>

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	<p>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.</p> <p>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.</p>	<p>transferring existing compliance measures and compliance monitoring elements. They will not develop any new ones, even where a requirement in an operating policy does not have any measures. In these cases, the block will indicate 'Not Specified' and the CCC and CMC will address implementation in the compliance program.</p> <p>The ANSI-accredited process is being used.</p>
TransÉnergie	<p>Hydro-Québec TransÉnergie (HQTE) 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.</p>	
TransÉnergie	<p>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.</p> <p>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.</p> <p>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.</p>	<p>See response to Hydro One.</p>
FRCC	<p>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.</p>	

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FRCC	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.	The working drafts will show how each requirement was addressed in the translation to Version 0.
FRCC	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.	Agreed.
CA-ISO	The California ISO strongly supports this effort.	
CA-ISO	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.	Agreed.
Manitoba	<p>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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Development of compliance material for these new Standards will be time</li> </ol>	<p>The ANSI-accredited process is being used to ensure there is a consensus on the interpretations. Ultimately, each person in the ballot pool is allowed to vote his or her support for the interpretations. The drafting team and SAC will seek a wide range of inputs on how best to translate existing reliability requirements.</p> <p>No new compliance measures or procedures will be introduced. If a reliability requirement has no measures or compliance elements today, it will not</p>

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	<p>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.</p> <p>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.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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).</p>	<p>have any in Version 0. That part of the standard will state 'Not Specified'. Any new compliance requirements will have to go through a separate SAR process.</p> <p>The process is not allowing for some requirements to be rejected. All current rules will be carried forward. Judging the benefit of a rule would only create unnecessary controversy, as suggested.</p> <p>Judging whether some standards are credible or beneficial is subjective. The project goal is to translate all rules that are approved and in effect today. Going forward beyond Version 0 these will be an opportunity to improve, expand upon, or delete individual standards.</p> <p>The approval process will follow the existing ANSI-accredited process manual. No financial penalties will be included in the Version 0 standards.</p> <p>The SAC has appointed a drafting team to maximize experience and knowledge of the reliability rules and to maximize diversity.</p> <p>All available inputs will be considered and everyone in industry who is interested is encouraged to participate in the work.</p>

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Manitoba	<p>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.</p> <p>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.</p>	<p>One goal of the Version 0 project is to reduce the number of processes and documents that industry participants need to follow. There will be a temporary increase in work load while we get the Version 0 standards done and all industry participants are strongly encouraged to be as active as possible in the Version 0 conversion.</p>
NYSRC	<p>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 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.</p>	<p>The SAC is seeking inputs from the industry on the transition plan. It was inadvertently labeled “final” because it was approved by the SAC and the Standards Transition Management Team for posting. The SAC has always intended to review the consensus of the industry through this SAR process to make a determination whether or not to proceed with Version 0.</p> <p>The SAC is committed to using the ANSI-accredited process for Version 0.</p> <p>The draft will be available for two comment periods of 30 and 45 days, plus another 30 days prior to balloting and another 30 days prior to Board adoption.</p>
NYSRC	The SAR should state that the translation process WILL NOT result in weaker Version 0	The drafting team believes the plan is

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	standards than in the existing reliability rules. Additional comments can be found under Question #2.	clear that no new standards will be introduced and no existing standards will be dropped.
NYSRC	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>6. There is nothing in the Plan document as to whether sanction matrices will be included in the Version 0 standards.</p>	<p>The transition plan is a working plan that will be maintained going forward by the SAC.</p> <p>While the intent is to not approve Version 1 standards prior to Version 0, it would be a breach of due process to dictate that an urgent action affecting reliability could not proceed according to the process manual.</p> <p>An explanation will be provided on each section of the existing rules that becomes a business practice or reference document. No existing requirements will be deleted.</p> <p>See prior response to comment periods.</p> <p>The sanctions and penalties will be shown as “not specified” for all Version 0 standards.</p> <p>Version 0 standards will be balloted as a block.</p> <p>Redrafting of the standard is not permitted by our ANSI-accredited process between the first and second ballot. The second ballot may occur immediately and its only purpose is to allow all ballot pool members to see comments submitted with negative votes on the first ballot.</p>

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	<p>7. It is not clear in the Plan document whether the Version 0 standards will be balloted individually or as a group.</p> <p>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.</p> <p>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?</p> <p>10. The title and brief description of each of the existing operating polices, 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.</p> <p>11. There is no milestone date shown for revising and re-issuing the Plan document (see Comment #1).</p> <p>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.</p> <p>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.</p>	<p>Only approved operating policies and planning standards that are in effect today will be included in Version 0. Some of the Phase IV planning standards may not have been field tested. Part of the Version 0 development process will be to evaluate whether the Phase IV planning standards are practical and being implemented. Industry inputs will be sought on that issue. All other policies and standards have been field tested, either explicitly or implicitly by implementation in the compliance program.</p> <p>All existing operating policies and planning standards are on the NERC web site at:  <a href="http://www.nerc.com/~oc/pds.html">http://www.nerc.com/~oc/pds.html</a>  <a href="http://www.nerc.com/~filez/pss-psg.html">http://www.nerc.com/~filez/pss-psg.html</a></p> <p>There is already a separate effort well underway to revise the standards process manual.</p> <p>The plan is a resource for the industry, not just a management tool for the Drafting Team or SAC. The plan is posted on the standards web page.</p>
TVA	<p>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</p>	<p>Multiple standards will be developed, but they will be voted on as a block. As a guideline, each section of a policy should become a standard and each planning</p>

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	<p>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.</p> <p>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.</p> <p>Statement 3 is reasonable, but again there may be differences among entities as to what constitutes a 'business practice' versus a 'reliability objective'.</p> <p>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.</p>	<p>standard will be a Version 0 standard. An initial estimate is there are less than 100 standards.</p> <p>The functional model has been approved by the NERC board. Care will be taken in incorporating the functional model into the standards to ensure reliability is not harmed and there is clear accountability for meeting reliability requirements. The functional model and the Version 0 standards will not specify or limit organizational structure.</p> <p>The Joint Interface Committee will review recommendations on what is a business practice in the Version 0 translation.</p>
TVA	<p>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.</p> <p>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.</p>	<p>Completing all policies and standards in one step will be easier than dividing the work into many smaller projects. It also will prevent having part of the rules in the old format and part in the new format.</p> <p>The drafting team has been supplemented by staff and consultant resources to get the work done.</p>
NPCC	<p>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.</p>	
	<p>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</p>	<p>Work plans will be revised to focus the Version 1 drafting teams on developing</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>revisions, replacements, or additions to Version 0 standards. The SAC will be carefully coordinating this work and the priorities and inform the drafting teams.</p> <p>There will be no new measures, compliance levels or sanctions developed as part of Version 0. Where these do not exist today, the Version 0 standards will state 'not specified'.</p> <p>The SAC is being careful to meet all the steps and requirements of the existing, ANSI-accredited standards process.</p> <p>This SAR process was intended as a checkpoint to assess industry support and to allow a go/no go decision if there was not support for the plan. The concepts of the plan were presented at the standing committee meetings in March.</p>
NYPA	<p>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.</p>	<p>This is a reasonable suggestion, however, the time schedule would not permit the additional posting times required by this approach.</p>
SERC EC	<p>We support these general objectives of moving to one set of standards and one standards process.</p>	
SERC EC	<p>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.</p>	<p>Phase III and IV planning standards will be reviewed to assess whether necessary field testing has been completed and whether the standards are currently being implemented. While the objective is to translate all existing standards, if a standard has not been adopted for</p>

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		implementation or is impractical for implementation, there is an opportunity to not include those standards in Version 0.
SERC EC	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.	With the purpose of translating existing rules, there should be little controversy on the requirements. Any issues that do suggest a need to change the rules should be addressed through separate SARs. The preferred approach will remain to vote the standards as a block, since they are a translation of existing rules.
Ed Davis	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.	
Chris Schaeffer	We support the concept of clear, reasonable standards.	
Chris Schaeffer	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.	Phase III and IV planning standards will be reviewed to assess whether necessary field testing has been completed and whether the standards are currently being implemented. While the objective is to translate all existing standards, if a standard has not been adopted for implementation or is impractical for implementation, there is an opportunity to not include those standards in Version 0.
Chris Schaeffer	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>There should not be an issue with introducing generator testing requirements, since the goal is to translate existing operating policies and planning standards without adding any new requirements or measures.</p> <p>Since the focus of the work is on</p>

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	<ul style="list-style-type: none"> <li>• Any testing performed for verifying Reactive Capability of generation units must be coordinated to assure nuclear plant licensing requirements are not violated.</li> <li>• 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.</li> </ul> <p>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.</p>	<p>translating existing operating policies and planning standards, the drafting team is working with subgroups on that basis. There are individuals with generator expertise on the team. Since there is no attempt in Version 0 to draft new generator requirements, a distinct group for that purpose is unnecessary. Regional or other generator interest groups are welcome to participate by attending drafting team meetings or through the comment process.</p>
Marc Butts	<p>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.</p> <p>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.</p> <p>If our Company is like most, the normal day-to-day operations is enough work without additional committee and Standard Drafting team meetings.</p> <p>Again, we support NERC's efforts with Version 0 and want it to be done correctly.</p>	<p>The SAC has reviewed the existing standards projects and shifted priorities to better accommodate the development of Version 0 standards. Standards that were incremental improvements of existing policies and standards have been slowed or stopped. Other projects that address an urgent reliability need or proposal new approaches to standards to replace current approaches are selectively being allowed to continue.</p>
Marc Butts	<p>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.</p> <p>There should be clear evidence on how current NERC policy within Version 0 will be</p>	<p>No new Version 1 standards will be incorporated into the Version 0 project. The most optimistic timing is that a Version 1 standard could immediately replace or be added to the Version 0 standards when Version 0 is approved by</p>

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	<p>enforced where there is not a Template or Standard covering the applicable section. Currently, there are no financial penalties associated with Policy violations.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>the NERC board in February 2005.</p> <p>There is a substantial risk of introducing improvements to the standards in Version 0, because the changes might not be seen by all as an improvement. Improvements will become parts of SARs to revise the Version 0 standards. Some of those may begin prior to approval of Version 0 so there is no unnecessary delay in adopting improvements. However, these improvements must be balloted separately from Version 0 to avoid concerns that would arise if the requirements change.</p> <p>Because implementing the IA scheduling method described in the functional model would result in substantive changes to the reliability rules, the IA function will only be partially implemented in Version 0. Version 0 will translate today's control area scheduling approach to a similar method that refers to Balancing Areas.</p> <p>The SAC believes the goals of the Version 0 project are better served by a single block vote. Opening the voting to topical areas introduces risks that some portions of today's requirements would not be successfully adopted, leaving an incomplete set of standards at the onset.</p> <p>The drafting team is carefully considering the functional model in developing Version 0. Although there are no</p>

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	<p>communicated on those standards that have not been addressed.</p>	<p>certification standards in place today, by focusing on the functional model, the three should be consistent.</p> <p>The drafting team is considering planning standards that were not field tested and whether those standards are practical for implementation and are in fact being used by industry today. If the standards are not practical and not being used, they will be omitted from Version 0.</p>
Roman Carter	<p>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.</p> <p>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.</p> <p>If our Company is like most, the normal day-to-day operations is enough work without additional committee and Standard Drafting team meetings.</p> <p>Again, we support NERC's efforts with Version 0 and want it to be done correctly.</p>	See comment above for Marc Butts.
Roman Carter	<p>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.</p> <p>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.</p> <p>If improvements to the current Templates in Version 0 need changes made to them</p>	<p>See response to Marc Butts.</p> <p>The drafting team will not create measures where they do not exist in a compliance template or planning standard today. Any blank sections of Version 0 standards will state: "Not Specified". Development of measures is deferred to Version 1.</p>

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	<p>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.</p> <p>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 O SDT will need to address this issue.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
Roger Green	<p>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.</p> <p>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.</p> <p>If our Company is like most, the normal day-to-day operations is enough work without</p>	See response to Marc Butts.

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	<p>additional committee and Standard Drafting team meetings.</p> <p>Again, we support NERC's efforts with Version 0 and want it to be done correctly.</p>	
Roger Green	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 O SDT will need to address this issue.</p> <p>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.</p>	See response to Marc Butts.
Alan Johnson	<p>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 and implementation of the sixteen reliability standards either under development or scheduled to be developed in the future (e.g. version 1).</p>	
Alan Johnson	Regarding item 3, under the section entitled "Detailed Description", propose that the	The drafting team is considering how best

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	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.	to package the Version 0 standards to facilitate use by those who must implement and monitor compliance with the standards.
Alan Johnson	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.	There is extensive coordination between NERC and NAESB on the Version 0 standards.
John Horakh	<p>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.</p> <p>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.</p>	
John Horakh	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.	The NERC board and the SAC have placed a high priority on the Version 0 effort. The SAC has and will continue to review standards project priorities so that sufficient resources are given to the Version 0 project.
John Horakh	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.	This change will be considered in subsequent communications of the plan.
Carter Edge	We support the development of clear, measureable reliability standards.	
Carter Edge	The detailed description of the SAR does not appear to recognize that there are board	The compliance templates approved by

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	<p>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.</p>	<p>the board in April 2004 will be made part of the Version 0 standards. Improvements can be introduced as new SARs. Planning standards will also be part of Version 0 standards, with the possible exception of measures that were not field tested and have not been adopted for implantation.</p>
Carter Edge	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Any testing performed for verifying Reactive Capability of generation units must be coordinated to assure nuclear plant licensing requirements are not violated.</li> <li>• 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.</li> </ul>	<p>Since Version 0 will incorporate only requirements and measures that are approved by the NERC board and currently in effect for the industry, the criteria listed in the comment should be met. Planning standard measures that have not been field tested and are impractical for implementation will not be included in Version 0.</p>
Alan Gale	<p>The need for this action is clear. It is imperative to get the "measures" correct.</p> <p>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?"</p>	<p>Agreed – all mandatory requirements will be in the Version 0 standards.</p>
Alan Gale	<p>Should Figure 1 (Standards Transition Overview) include additional information on the</p>	<p>The Urgent Action Cyber Security</p>

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	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.	Standard will remain in effect until the permanent standard is adopted.
William Pope	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.	Retaining the existing operating policies, planning standards, and compliance templates would not allow NERC to meet the goals stated in the transition plan.
Karl Kohlrus	<p>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.</p> <p>Finally, it seems that NERC is getting its act together and developing an ANSI certified 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.</p>	
Paul Arnold	<p>BPA supports the stated objective of the SAR and supplies the following comments and questions for consideration:</p> <p>(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.</p> <p>(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</p>	<p>Critical gaps in standards can be filled by separate standards proposals. For instance, a new standard on vegetation clearances from transmission lines has been proposed. However, these new requirements cannot be part of the Version 0 standards or else consensus in the overall objectives of Version 0 could be jeopardized.</p> <p>Regional differences will be preserved (neither expanded or contracted). Any new regional differences, even if motivated by measures in the new compliance templates, should be submitted as separate SARs for consideration.</p>

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	<p>recognized in Version 0.</p> <p>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.</p> <p>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.</p> <p>(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?</p> <p>(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</p>	<p>Version 1 standards in development can become replacements or additions to the Version 0 standards.</p> <p>Once voting begins, the standard cannot be revised. To do so between the initial and recirculation ballots would not be fair to others in the ballot pool who voted on the standard as being acceptable the first time. That is an established feature of the NERC standards process.</p> <p>The team "enforceable standards", as used in the transition plan, implies a standard that is objective, measurable, and practical for monitoring in a compliance program.</p> <p>Any useful information that is not required will be placed into reference documents. The NERC standing committees will be asked to do this work. The Version 0 standards will include a list of terms and definitions that are used in and made part of the standards.</p>

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