

NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

Coordinate Operations Standard Drafting Team

December 4–5, 2003

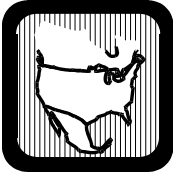
Hilton San Francisco
333 O'Farrell Street
San Francisco, CA

Agenda

- 1) Welcome, introductions, review of administrative items — Steve McCoy
 - a. Direction/goals of meeting
- 2) Review and approval of October 16–17, 2003 Chicago meeting minutes — Steve McCoy
- 3) NAESB WEQ Business Practice Update (15 minutes)
 - a. WEQ Subcommittees and Business Practices — Steve McCoy
 - b. Coordinate Operations BP Drafting Team Update — Narinder Saini
- 4) Eastern Blackout discussion — Steve McCoy (15 minutes)
 - a. Are there lessons learned that affect RA to RA coordination?
- 5) Review of Requirements and Measures
- 6) Draft Compliance Monitoring, Levels of Non-Compliance and Sanctions Table
- 7) Review and Finalize Comment Form
- 8) Develop Action Items and Due Dates

Attachments:

1. Minutes of the October 16–17, 2003 Coordinate Operations Standard Drafting Team meeting
2. Draft Coordinate Operations Standard dated October 17, 2003
3. Draft Comment Form



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Coordinate Operations Standard Drafting Team

October 16–17, 2003
Chicago, Illinois

Draft Meeting Minutes

Attendance

Steve McCoy—Chairman, CAISO
Narinder Saini, Entergy
Darrel Richardson, Illinois Power
John Norden, ISO-NE
Norb Mizwicki, MAIN
Al DiCaprio, PJM
Don Gold, BPA

Jason Shaver, ATCLLC
Gary Campbell, MAIN
Peter Brandien, Northeast Utilities
Al Miller, IMO
Maureen Long, NERC
Barry Gee, National Grid
Larry Kezele, NERC

Summary of Discussions

1. Chairman McCoy reviewed the agenda.
2. The Coordinate Operations Standards Drafting Team (COSDT) approved the meeting minutes from the August 11–12, 2003 meeting.
3. The COSDT discussed the August 14, 2003 power outage from the perspective of the potential ramifications of that outage on Reliability Authority to Reliability Authority communications and the Coordinate Operations Standard. The COSDT noted that coordination is essential during system restoration. The COSDT also noted the importance of the periodic conference calls currently taking place between various Reliability Coordinators within the Eastern Interconnection.
4. Chairman McCoy led the team through a thorough discussion and re-write of each of the 5 requirements and measures drafted during the first and second COSDT meetings. The COSDT decided to eliminate requirement 5 (Reliability Analysis) because its sub-requirements are captured in either Requirement 2 (Notifications and Data Exchange) or Requirement 3 (Coordination). The current working draft of the Coordinate Operations Standard, dated October 17, 2003, is attached as **Exhibit A**.
5. Gary Campbell, Norb Mizwicki (MAIN's Compliance Monitor), and Chairman McCoy led the team on a brief discussion of the Compliance Monitoring Process, the Levels of Non-Compliance, and the Sanctions sections of the standard. The COSDT developed a Levels of Non-Compliance subsection for the Procedures Requirement.

6. Chairman McCoy provided a status report of recent NAESB WEQ activities related to the development of business practices to support the NERC reliability standards. He also provided an overview of the NAESB Wholesale Electric Quadrant organization (see **Exhibit B**). Narinder Saini is a member of NAESB's Coordinate Operations business practices task force. Larry Kezele stated that he has been asked to be the NERC staff liaison to the NAESB Operate Within Limits business practices task force.

Action Items

1. Chairman McCoy will develop Levels of Non-Compliance tables to support each of the remaining 3 requirements and measures.

Next Meeting

The next meeting of the COSDT will be December 4 (8 a.m.–5 p.m.) and December 5 (8 a.m.–3 p.m.) in San Francisco, California. The purpose of this meeting is to finalize the draft standard and complete edits to a comment form that will be posted with the draft standard.

Procedures

1. Requirements

- 1.1. The RA shall develop and share Operating Procedures, Processes or Plans that include other reliability area(s).
- 1.2. The RA shall distribute each of those Operating Procedures, Processes or Plans to those RAs that are referenced in these documents.
- 1.3. The RA shall follow its documented update methodology

2. Measures

- 2.1. The RA shall have evidence that each Operating Procedure, Process or that includes another RA exists and was distributed to all referenced RAs. (Example of Evidence: E-mail transmittal notice, a copy of a memo or other documentation).
- 2.2. The RA shall have a document change control procedure that includes provisions for the following:
 - 2.2.1. Review cycle at least once every three years, regardless of whether changes have been actively identified.
 - 2.2.2. Notice to recipients that there were changes to the documents.
 - 2.2.3. Summary or identification of changes made to the document.
 - 2.2.4. Version control and archival.
- 2.3. The RA shall have evidence that its Procedures, Processes or plans (that include other RAs) have been updated in accordance with the documented update methodology

3. Regional Differences

None identified.

4. Compliance Monitoring Process

- 4.1. The reliability authority shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The reliability authority shall keep documentation for rolling 12 months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The reliability authority shall have the following available upon the request of its compliance monitor:
 - 4.3.1. Evidence that each of its operating procedures that includes other RAs has been distributed to each RA referenced in that procedure
 - 4.3.2. A document change control procedure that shall includes provisions for the following:
 - 4.3.2.1. Review cycle at least once every three years, regardless of whether changes have been actively identified.
 - 4.3.2.2. Notice to recipients that there were changes to the documents.

4.1 and 4.2 were copied from the work we did on the Notification requirement

- 4.3.2.3. Summary or identification of changes made to the document.
- 4.3.2.4. Version control and archival.
- 4.3.3. Evidence that its Procedures, Processes or Plans were updated in accordance with the RA's documented update methodology.
- 4.3.4. The compliance monitor shall interview (can be by email or other source) other RAs to verify that they received the documents

5. Levels of Non-compliance

- 5.1. Level One: No Change control process
- 5.2. Level Two: Operating Procedures, Processes or Plans developed but not updated in accordance with change control process.

or

Operating Procedures, Processes or Plans not distributed to those RAs that are referenced in these documents.
- 5.3. Level Three: Not applicable
- 5.4. Level Four: No Operating Procedures, Processes or Plans developed

6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

Section 6
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IROL
Standard for
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starting point

Notifications and Data Exchange

1. Requirement

- 1.1. The RA shall participate in daily regional or sub-regional conference calls or other communication forums to exchange information with other RAs relative to real-time or short-term interconnection reliability. (The Regions shall establish a time for these calls that recognizes some RAs may wish to participate in more than one of these calls.)
- 1.2. The RA shall follow its process or procedure in notifying other RAs of conditions in its RA Area.
- 1.3. The RA shall follow its process or procedure in providing requested data and information to other RAs – this is limited to data and information needed to support reliability assessments.

2. Measures

- 2.1. The RA shall have evidence that it has prepared for and participated in its daily call
- 2.2. The RA shall have a documented process or procedure that defines the conditions under which it will notify other RAs; the process it will follow in making those notifications; and the data and information it will exchange. This process or procedure shall be mutually agreeable to the involved RAs. The RA shall have an operating log or other data source that documents it has followed its process or procedure for notifying other RAs of specific conditions in its RA Area.
- 2.3. No complaints were filed with the RA that data wasn't provided as requested.

3. Regional Differences

None Identified

4. Compliance Monitoring

- 4.1. The reliability authority shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The reliability authority shall keep documentation for rolling 12 months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The reliability authority shall have the following available upon the request of its compliance monitor:
 - 4.3.1. Agreed upon processes or procedures
 - 4.3.2. Evidence it followed the agreed upon processes
 - 4.3.3. Evidence of any tests conducted
- 4.4. When questioned, other RAs confirm that they were notified in accordance with the process or procedure and that data was provided as agreed upon.

5. Levels of Non-compliance

- 5.1. Level one: Process documented, but not followed or tested
- 5.2. Level two: No documented process.
- 5.3. Level three: Not applicable
- 5.4. Level four: Not applicable

6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

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Coordination

1. Requirement

- 1.1. The RA that identifies a potential, expected, or actual problem that adversely impacts another RA or the Interconnection shall contact other RAs to discuss options and decide upon a solution to prevent or resolve the identified problem.
 - 1.1.1. The RAs involved shall document and implement the selected solution.
 - 1.1.2. If an agreed upon solution cannot be reached, each RA shall take actions in its own Reliability Area to preserve Interconnection reliability.

2. Measures

- 2.1. For events where an RA has contacted one or more other RA(s) for assistance in resolving a potential, expected or actual problem that adversely impacts the interconnection and the RAs were able to agree to a solution:
 - 2.1.1. The RAs involved shall have documentation for the event (operations log or other data source) including date and time, RA(s) involved in discussion, description of the condition or problem, solution identified, actions taken and other comments relevant to the condition.
- 2.2. For events where an RA has contacted one or more other RA(s) for assistance in resolving a potential, expected or actual problem that adversely impacts the interconnection and the RAs were not able to agree on a solution:
 - 2.2.1. The RAs involved shall have documentation for the event(operations log or other data source) including date and time, RA(s) involved in discussion, description of the condition or problem, notice that no solution was agreeable to all involved RAs, actions taken and other comments relevant to the condition.

3. Regional Differences

None identified.

4. Compliance Monitoring Process

- 4.1. The RA shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint (complaints must be filed within 90 days of incident), or triggered by a system disturbance or abnormal operating condition, to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The RA shall keep operations logs, or other data sources for 12 rolling months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The RA shall have the following available upon the request of its compliance monitor:
 - 4.3.1. Operations logs or other data sources with the date and time other RAs were contacted for assistance in solving a problem, description of the problem that led to the notification, actions taken or directives issued to alleviate the problem (if applicable) , and other comments relevant to the condition.

5. Levels of Non-compliance

5.1. **Level one:**

5.2. **Level two:**

5.3. **Level three:**

5.4. **Level four:**

6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

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Outages

1. Requirement

- 1.1. The RA shall identify to other RA's through applicable agreements or procedures, those facilities (generation, transmission, and protection outages etc) that are impactful to the reliability of their system.
 - 1.1.1. If an RA identifies a system configuration or outage condition that was not recognized in the development of the impactful list, but is thought to be impactful to the reliability of another RA, the RA shall identify this configuration to the impacted RA.
- 1.2. The RA shall have a mutually agreeable process for sharing its outage information associated with the facilities identified in 1 above with its impacted RAs.
- 1.3. The RA shall follow its process for sharing its outage data with other RAs.

2. Measures

- 2.1. The RA shall have:
 - 2.1.1. An agreed upon list of its facilities that are impactful to other RAs within its interconnection
 - 2.1.2. An agreed upon list of other RAs' facilities that are impactful to its reliability area
- 2.2. The RA shall have a mutually agreeable documented process for sharing its outage data with other RAs.
- 2.3. The RAs shall have evidence that its process for sharing its outage information as agreed upon.

3. Regional Differences

None identified.

4. Compliance Monitoring Process

- 4.1. The RA shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The RA shall keep operations logs, or other data sources for 12 rolling months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The reliability authority shall have the following available upon the request of its compliance monitor:
 - 4.3.1. An agreed upon list of its facilities that are impactful to other RAs within its interconnection
 - 4.3.2. An agreed upon list of other RAs' facilities that are impactful to its reliability area
 - 4.3.3. A mutually agreeable documented process for sharing its planned outage data with other RAs
 - 4.3.4. Evidence that its process for sharing its outage information as agreed upon.

4.1 and 4.2 were copied from the work we did on the Notification requirement

- 4.4. When questioned, other RAs within the interconnection shall confirm that they received outage data as agreed upon

5. Levels of Non-compliance

- 5.1. **Level one: Process documented, but not followed or tested**
- 5.2. **Level two: No documented process.**
- 5.3. **Level three: Not applicable**
- 5.4. **Level four: Not applicable**

6. Sanctions

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Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

Comment Form for 1st Posting of Coordinate Operations Standard

Note – This form is to comment on version 1 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATONS_05_01**) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>

E-mail this form between December 15 – January 30, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards – Tim Gallagher at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this first draft of the Coordinate Operations Standard without including all of the requirements originally identified in the associated SAR. As shown in the following table, several of the areas originally identified for inclusion in the Coordinate Operations Standard have been addressed by other SARs or Standards. To avoid a situation where there may be two requirements addressing the same performance, the Coordinate Operations Standard Drafting Team has highlighted areas where a topic has been dropped from the draft standard, and asks for industry feedback on the appropriateness of this action. The following table provides an overview.

Topics in Coordinate Operations SAR	How Topic is Addressed in Coordinate Operations Standard or Other Documents
Document the RA’s authority to assist in resolving problems that its caused to another system	The RA Certification SAR contains the following requirement that the RA’s authority be documented: Agreements. Agreements ¹ must be in place defining the responsibilities and authority of the RELIABILITY AUTHORITY with respect to all Balancing Authorities, Interchange Authorities, Transmission Operators, Transmission Service Provider and all other applicable functional entities within the reliability area and with other Reliability Authorities. Agreements shall address both normal and emergency operations.
Develop, Maintain and Share Operating Procedures • Operating procedures that address identified potential operating scenarios that may impact neighbor RA’s or the Interconnection shall be developed, and distributed to all entities that are expected	This requirement is at least partially addressed elsewhere, in several different SARs and Standards, including: Operate within Interconnection Reliability Operating Limits Standard contains the following requirement: The reliability authority shall have an action plan that identifies actions it shall take or actions it shall direct others to take, to prevent or mitigate instances of exceeding its interconnection reliability operating limits. (Measures require plan to be shared.)

¹ An agreement is defined as a contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. **The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.**

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<p>to take action or that may be impacted as a result of this procedure.</p>	<p>Prepare for and Respond to Blackout and Island Conditions</p> <p>Requirements shall be established for the development, coordination, implementation, and maintenance of an executable restoration plan to restore normal operation of the power system following blackout or island conditions. Plan requirements shall include items such as coordination among neighboring systems, black-start capability, resynchronization, transmission system restoration, load and generation restoration, etc.</p> <p>Prepare for and Respond to Abnormal or Emergency Conditions</p> <p>Requirements shall be established for the development, coordination, implementation, and maintenance of an executable operating plan to maintain safe and reliable operation of the power system given abnormal and/or emergency conditions such as the unexpected sudden outages of transmission, generation, or load facilities; capacity and energy shortages; failure of equipment such as communications facilities and control centers; etc. Plan requirements shall include items such as coordination among neighboring systems, load curtailments, notification requirements, restoration procedures, etc.</p> <p>Note: Requirements for the development of procedures that address specifically identified facility outages (e.g. loss of a specific line or transmission element) are not intended to be addressed by this standard and are expected to be covered elsewhere in standard operating procedures rather than by emergency plans.</p> <p>The RA Certification SAR includes a list of procedures that must be in place – however there is no requirement to share these procedures. The procedures include the following:</p> <ul style="list-style-type: none">Process/procedure in place to receive day-ahead hourly dispatch pattern from the Balancing Authority.Process/procedure in place to receive interchange transaction information from the Interchange Authority.Process/procedure in place for collecting transmission owners’ equipment ratings.Process/procedure and tools in place to perform real-time and contingency reliability analyses.Process/procedure and tools in place to coordinate and approve transmission outages from a reliability perspective.Process/procedure and tools in place to collect and analyze generation outages from a reliability perspective.Process/procedure in place with other Reliability Authorities to coordinate day-ahead
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	<p>analyses and to implement real-time actions.</p> <p>Process/procedure in place defining the analysis and approval process for interchange transactions into, out of, and through the reliability area.</p> <p>Process/procedure and tools in place to develop real-time operating reliability limits.</p> <p>Process/procedure in place that define the actions to be taken for maintaining reliability.</p> <p>Process/procedure and tools in place for compliance with all applicable NERC reliability standards.</p> <p>Process/procedure in place that defines the coordination and implementation of emergency operations within or on an area-wide basis.</p> <p>Process/procedure in place that defines the coordination and implementation of system restoration operations within or on an area-wide basis.</p> <p>Plan in place that ensures continued operation during abnormal and emergency conditions due to the loss of facilities.</p>
<p>Analyze Maintenance Outages (real time to 12 months ahead)</p> <ul style="list-style-type: none"> • Analyze the impact of generation outages from a reliability perspective • Analyze the impact of transmission outages from a reliability perspective 	<p>The Operate Within IROLs Standard includes the analysis of maintenance outages and generation resource availability as part of the day-ahead operational planning analysis. The definition of ‘operational planning analysis’ includes the following language:</p> <p style="padding-left: 40px;">An analysis of the expected system conditions, given the load forecast(s), and known system constraints some examples being transmission facility outages, generator outages and equipment limitations</p> <p>The Operate Within IROLs Standard requires that the RA develop a data specification to identify what data it needs to conduct real time monitoring, operational planning analyses and real-time assessments. The Operate Within IROLs Standard has a very short planning horizon – no further than a day ahead.</p> <p style="padding-left: 40px;">The reliability authority shall specify and collect the data it needs to support real-time monitoring, operational planning analyses and real-time assessments conducted relative to operating within its reliability area’s interconnection reliability operating limits. The reliability authority shall collect this data from the entities performing functions that have facilities monitored by the reliability authority, and from entities that provide facility status to the reliability authority.</p> <p>The section of the SAR does indicate a need to analyze outages, but doesn’t address sharing the results of these analyses. The exchange of data from these analyses is addressed under the Coordinate Operations requirement called, “Notifications and Data Exchange.” Note that</p>

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	<p>the Certification SAR includes a requirement that procedures be in place for the following:</p> <ul style="list-style-type: none"> Process/procedure and tools in place to coordinate and approve transmission outages from a reliability perspective. Process/procedure and tools in place to collect and analyze generation outages from a reliability perspective.
<p>Coordinate Reliability Analyses (Generator Resources and Transmission Facilities) (For current and next day and for its impact on other systems)</p> <ul style="list-style-type: none"> • The RA shall coordinate the development of its reliability analyses with other RAs. These analyses shall consider known generation and transmission outages. • The RA shall share the results of its system analyses, when conditions² warrant, with other RA's, and other involved entities (or upon request, subject to the FERC Code of Conduct and other Confidentiality Agreements) 	<p>The Operate Within IROLs Standard requires the RA to perform Operational Planning Analyses and Real-time Assessments but does not require that these be shared with others.</p> <p>The reliability authority shall perform operational planning analyses to assess whether the planned bulk electric system operations within the RA's reliability area will exceed any of its interconnection reliability operating limits.</p> <p>The reliability authority shall perform real-time assessments to determine if its reliability area is exceeding any interconnection reliability operating limits or is expected to exceed any interconnection reliability operating limits.</p> <p>Sharing the results of analyses is included in the Coordinate Operations Standard in the "Reliability Analyses" requirement.</p>
<p>Communicate with other impacted RAs to share information:</p> <ul style="list-style-type: none"> • The RA shall communicate with other impacted RAs whenever there is a known potential or actual condition that may adversely affect another RA's Area, such as: <ul style="list-style-type: none"> - A generator or transmission outage will impact another RA - Outages of information technology (IT) systems (telemetry, 	<p>This topic is not addressed elsewhere, and is included in the Coordinate Operations Standard in the "Notifications and Data Exchange" requirement.</p>

² The conditions referenced are those that, if left unattended, could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the interconnected bulk transmission system.

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<p>communications, and/or control equipment or other information systems) prevent an RA from performing a reliability analysis of its RA Area or impact the ability of one RA to receive/send data or voice communications to another RA</p> <ul style="list-style-type: none"> - Results of analyses or real-time conditions indicate potential or actual reliability problems - Physical or cyber attacks have been threatened or have occurred 	
<p>Communicate with other impacted RAs to identify, agree upon, and act or direct others to act to implement solutions to prevent/resolve impending/actual operating problems such as:</p> <ul style="list-style-type: none"> • When interconnection -wide transmission reliability preservation procedures need to be implemented • When a reliability problem occurs that requires the initiation/coordination of Operating Procedures or the development of new or temporary procedures. • When interconnection frequency is exceeding interconnection frequency limits • For prioritization of transmission outages • For prioritization of IT outages 	<p>This topic is not addressed elsewhere, and is included in the Coordinate Operations Standard in the “Coordination” requirement.</p>
<p>Resolve Conflicts Between RAs</p>	<p>This topic is not addressed elsewhere, and is included in the Coordinate Operations Standard in the “Coordination” requirement.</p>

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Background

1. Do you agree with the SDT that documenting the RA's authority to assist in resolving problems that its caused to another system is addressed in the RA Certification Criteria?

Yes

No

Comments

2. Do you agree with the definition provided in the front of this standard for _____?

Yes

No

Comments

3. Do you agree with the definition provided in the front of this standard for _____?

Yes

No

Comments

4. Do you agree with the definition provided in the front of this standard for _____?

Yes

No

Comments

5. Do you agree with the definition provided in the front of this standard for _____?

Yes

No

Comments

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Requirement 01 - Procedures

1. Do you agree with the requirement?

Yes

No

Comments

2. Do you agree with the measures?

Yes

No

Comments

3. Do you agree with the compliance monitoring process?

Yes

No

Comments

4. Do you agree with the levels of non-compliance?

Yes

No

Comments

5. Do you feel there is a minimum list of 'operating scenarios' that should be addressed in procedures developed between RAs?

Yes

No

If yes, please list what 'operating scenarios' should be addressed.

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Requirement 02 - Notifications and Data Exchange

6. Should there be a requirement that the RA's have a process for communicating data and information to all RAs within the interconnection?

- Yes
- No

Comments

7. Should this standard include a requirement that all the RAs in an interconnection to have an agreed-to method for RAs to communicate with one another across their interconnection?

- Yes
- No

Comments

8. Do you agree with the requirement?

- Yes
- No

Comments

9. Do you agree with the measures?

- Yes
- No

Comments

10. Do you agree with the compliance monitoring process?

- Yes
- No

Comments

11. Do you agree with the levels of non-compliance?

- Yes
- No

Comments

12. Do you feel there is a minimum list of 'data' that should be addressed in procedures developed between RAs?

- Yes
- No

Comments

If yes, please list what 'data' should be addressed.

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Requirement 03 - Coordination

13. Do you agree with the requirement?

Yes

No

Comments

14. Do you agree with the measures?

Yes

No

Comments

15. Do you agree with the compliance monitoring process?

Yes

No

Comments

16. Do you agree with the levels of non-compliance?

Yes

No

Comments

17. Do you feel there is a minimum list of 'data' that should be addressed in procedures developed between RAs?

Yes

No

If yes, please list what 'data' should be addressed.

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Requirement 04 – Outages

18. Should this requirement specify when the RAs must exchange outage data (example – should the requirement state that an RA must share the data within 5 days of receipt) or should this be left up to the individual RAs to decide amongst themselves?

- The process or procedure addressed in this requirement should include a specific timing element
 The process or procedure addressed in this requirement should not be required to include a specific timing element

Comments

19. Should this requirement identify what data RAs should exchange relative to outages, or should this be left up to the individual RAs to decide amongst themselves?

- The process or procedure addressed in this requirement should include a minimum list of data to exchange relative to the outage
 The process or procedure addressed in this requirement should not be required to include a minimum list of data

Comments

20. Should this requirement include a statement that the RA notify its Compliance Monitor if data or information is not exchanged in accordance with the agreed upon process.

Yes

No

Comments

21. Do you agree with the requirement?

Yes

No

Comments

22. Do you agree with the measures?

Yes

No

Comments

23. Do you agree with the compliance monitoring process?

Yes

No

Comments

24. Do you agree with the levels of non-compliance?

Yes

No

Comments

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Requirement 05 - Reliability Analyses

25. Do you agree with the requirement?

Yes

No

Comments

26. Do you agree with the measures?

Yes

No

Comments

27. Do you agree with the compliance monitoring process?

Yes

No

Comments

28. Do you agree with the levels of non-compliance?

Yes

No

Comments