

Comment Report

Project Name: 2023 Standard Processes Manual Revisions to Address SPSEG Recommendations | Draft 2
Comment Period Start Date: 4/13/2023
Comment Period End Date: 5/30/2023
Associated Ballots: Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A AB 2 OT

There were 46 sets of responses, including comments from approximately 127 different people from approximately 89 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.
2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.
3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.
4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.
5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.
6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?
7. Please provide any other comments for the team to consider, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Deborah Currie	1	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO

Fred Meyer	Algonquin Power Co.	3	MRO
Christopher Bills	City of Independence Power & Light	3,5	MRO
Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
Marc Gomez	Southwestern Power Administration	1	MRO
Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
Bryan Sherrow	Board of Public Utilities	1	MRO
Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
Terry Harbour	MidAmerican Energy Company	1,3	MRO
Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
Michael Brytowski	Great River Energy	1,3,5,6	MRO
Shonda McCain	Omaha Public Power District	6	MRO
George E Brown	Pattern Operators LP	5	MRO
George Brown	Acciona Energy USA	5	MRO
Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
Kimberly Bentley	Western Area Power Administration	1,6	MRO
Jay Sethi	Manitoba Hydro	1,3,5,6	MRO

					Michael Ayotte	ITC Holdings	1	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating	10	NPCC

Council

	Council		
Alain Mukama	Hydro One Networks, Inc.	1	NPCC
Deidre Altobell	Con Edison	1	NPCC
Jeffrey Streifling	NB Power Corporation	1	NPCC
Michele Tondalo	United Illuminating Co.	1	NPCC
Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
Randy Buswell	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Joshua London	Eversource Energy	1	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento	3	WECC

						Municipal Utility District		
					Charles Norton	Sacramento Municipal Utility District	6	WECC

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC agrees that the proposed changes to SPM Section 1.4 communicate NERC's statutory obligation and support NERC's efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements.

The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

MRO NSRF agrees that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards.

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name

Comment

Southern Indiana Gas & Electric Company agrees that the proposed changes to SPM Section 1.4 communicate NERC's statutory obligation and supports NERC's efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements.

The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.

Likes 0

Dislikes 0

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer

Yes

Document Name

Comment

Xcel Energy does not oppose these changes.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

PG&E agrees with the proposed modifications and clarification that the concepts of the ANSI processes will be continued.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer

Yes

Document Name

Comment

Yes, Duke Energy agrees that the proposed changes communicate that NERC's process will continue with the core principles of an open and inclusive

standard development process.

Likes 0

Dislikes 0

Response

Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin

Answer

Yes

Document Name

Comment

ITC agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

Yes

Document Name

Comment

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEI appreciates NERC's consideration of our prior comments and that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes. These changes will not alter this vital part of this process.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #1.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

OPG support NPCC RSC

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Tacoma Power appreciates NERC's consideration of prior comments and concurs that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lori Frisk - Allete - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

Kimberly Turco - Constellation - 6

Answer No

Document Name

Comment

Constellation agrees with the changes made to Section 4.2 to remove the introduction of “Board of Trustees” directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes “some vetting in the industry.” As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

OPG has concerns regarding SARS bypassing formal posting/commenting, which can lead to less than adequate industry vetting of reliability standards development.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer No

Document Name

Comment

Constellation agrees with the changes made to Section 4.2 to remove the introduction of “Board of Trustees” directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes “some vetting in the industry.”

As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Lori Frisk - Allete - Minnesota Power, Inc. - 1

Answer

Yes

Document Name

Comment

Minnesota Power agrees with MRO’s NERC Standards Review Forum’s (NSRF) comments.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #2.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes
Document Name	
Comment	
EEI agrees with the proposed changes to Section 4.2.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Suggestion – As noted in the SPSE Process Improvement Recommendations Work Plan, can the first bullet be reworded as “...have had some vetting in the industry as determined by the Standards Committee such as endorsement by the RSTC or other industry stakeholders.” We understand that is what is happening, but It would be helpful to have this documented in the SPM.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	

Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
With regard to proposed revisions at Section 4.2: SAR Posting, Southern agrees that it is a helpful next step for NERC Staff to ask the Standards Committee to further define expectations regarding industry vetting.	
Likes	0
Dislikes	0
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed changes. PG&E agrees with the MRO NSRF input that the Standards Committee publish the criteria used to determine what are the "some vetting in industry" expectations so they can be consistently applied.	
Likes	0
Dislikes	0
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	

Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that changes to section 4.2 are appropriate. However, MRO NSRF requests that the Standards Committee publish the criteria by which it is determined that a SAR has had “some vetting in industry.”	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	

Answer	Yes
Document Name	
Comment	
As the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The ISO RTO Council Standards Review Committee (SRC) encourages the Standards Committee to expeditiously define the expectations for vetting SARs and broadly communicate those to industry.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	

Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Micah Runner - Black Hills Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Devon Tremont - Taunton Municipal Lighting Plant - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3

Answer	Yes
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Document Name	
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Comment	
----------------	--

Likes 0	
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Dislikes 0	
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Response	
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Lindsey Mannion - ReliabilityFirst - 10

Answer	Yes
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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LaTroy Brumfield - American Transmission Company, LLC - 1

Answer	Yes
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

As previously stated in our response to Question #2, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

MRO NSRF agrees that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Texas RE recommends the language specify who would be determining whether to shorten the comment period.

Likes 0

Dislikes 0

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer Yes

Document Name

Comment

Xcel Energy does not oppose shortening additional balloting periods to any less than 30 days, as circumstances allow.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the proposed modifications to indicate the initial period would remain 45-days and subsequent periods could be as short as 30-days depending on the complexity of the modifications.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin

Answer Yes

Document Name

Comment

ITC agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports shortening the subsequent comment periods, as appropriate, based on the considerations provided in Section 4.12.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #3.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1**

Answer

Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response**Kinte Whitehead - Exelon - 3**

Answer

Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 3**

Answer

Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

OPG support NPCC RSC

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

Yes

Document Name

Comment

Tacoma Power supports shortening the subsequent comment periods to no less than 30 days, based on the considerations provided in Section 4.12.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Lori Frisk - Allele - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foug Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer No

Document Name

Comment

The Final Ballot provides awareness of the changes to the Reliability Standards. This change would remove certainty around the final approval logistics. To meet the intent of having a more efficient process, a shorter voting window may be considered.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer Yes

Document Name

Comment

SMUD applauds NERC's proposal of providing the Standards Drafting Team with the option to skip the final ballot if certain circumstances are met. We feel that having to meet all circumstances to skip the final ballot creates the necessary high bar for projects to meet in order to skip this important step.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

Yes

Document Name

Comment

Tacoma Power agrees with proposed criteria for skipping a final ballot. This proposed modification will help streamline Standard Projects with high industry consensus.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

OPG support NPCC RSC and agrees with skipping the final ballot as long as the Standard Drafting Team effort to resolve applicable objections do not result in substantive changes to the documents subject to the last comment and ballot period.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #4.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEI agrees with allowing the drafting team to conclude a standard action without a final ballot if the four options provided in Section 4.13 are met.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer Yes

Document Name

Comment

WECC would support a slightly lower number also, such as 80% or higher, but WECC also supports setting the bar at 85%.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes	0
Dislikes	0
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern agrees with the proposed revisions that establish four separate criteria which must be satisfied before a standard drafting team, under its own discretion, waives a final ballot. However, it is not clear if and how a standards drafting team will document its consideration and decision to waive a final ballot. The standard drafting team should document how it satisfied each of the four criteria in the standards development records.	
Likes	0
Dislikes	0
Response	

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the modifications to allow the final ballot to be skipped if the four (4) conditions in Section 4.13 have been met from the last ballot for the modifications.

Likes 0

Dislikes 0

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer Yes

Document Name

Comment

Xcel Energy does not oppose these changes.

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

MRO NSRF agrees with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4**Answer** Yes**Document Name****Comment**

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response**Thomas Foltz - AEP - 5****Answer** Yes**Document Name****Comment**

AEP has no disagreement with elimination of the Final Ballot to achieve process efficiencies. That being said, extreme care should be taken to ensure that no substantive changes are made to the revised documents after the last comment and ballot period. On a related note, the current version of Appendix 3A states "Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination" however it is not clear what the exact process for this is, nor when it would occur. Appendix 3A might benefit from additional clarity on that topic.

Likes 0

Dislikes 0

Response**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter****Answer** Yes**Document Name****Comment**

N/A

Likes 0

Dislikes 0

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lori Frisk - Allele - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

AEP has no disagreement with adding the text “In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee” as a well as “In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.” Once again, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

MRO NSRF agrees that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take.

Likes 0

Dislikes 0

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer Yes

Document Name

Comment

Xcel Energy does not oppose these changes.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the modifications to Section 4.12 and they clearly indicate how a project would be terminated.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin

Answer

Yes

Document Name

Comment

ITC agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

Yes

Document Name

Comment

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl agrees the proposed revisions Section 4.12 provided clarity for the termination of unsuccessful projects.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #5.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1**Answer** Yes**Document Name****Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response**Kinte Whitehead - Exelon - 3****Answer** Yes**Document Name****Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 3****Answer** Yes**Document Name****Comment**

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response**Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer** Yes

Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power

Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

OPG support NPCC RSC

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3**Answer** Yes**Document Name****Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1****Answer** Yes**Document Name****Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response**Alison MacKellar - Constellation - 5****Answer** Yes**Document Name****Comment**

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response**Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster****Answer** Yes

Document Name	
Comment	
Eergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #6.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the revisions to Section 4.14 is clear on actions that may be taken after an unsuccessful ballot.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	

ITC agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with modifications to Section 4.14 and they clearly indicate the actions the Standards Committee will take after a failed final ballot.

Likes 0

Dislikes 0

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer Yes

Document Name

Comment

Xcel Energy does not oppose these changes.

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

MRO NSRF agrees that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer

Yes

Document Name

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

As stated in our previous responses, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foug Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Lori Frisk - Allele - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Christine Kane - WEC Energy Group, Inc. - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	

7. Please provide any other comments for the team to consider, if desired.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC

Answer

Document Name

Comment

The SRC appreciates NERC's consideration of industry comments and believes Draft 2 of the proposed SPM revisions will significantly improve the agility and nimbleness of the standards development process, which is necessary given the ever increasing threats to the reliability and security of the Bulk Electric System.

We encourage the Standards Committee, the Reliability and Security Technical Committee, and any other NERC committees tasked with implementing the SPM or SPSEG changes to do so promptly and to broadly communicate their process and procedural changes to industry in a coordinated and consolidated manner. Of particular urgency is the update to the SAR form tasked to the Standing Committee Coordinating Group. With so many Reliability Standard projects, stakeholder resources must be allocated appropriately to the highest risk projects. We recommend that the SAR form be updated to include a risk prioritization ranking for each Reliability Standard project, a proposed timeline for completion based on the risk ranking, and an

identification of all responsible entities to ensure complementary requirements are placed on all entities needed to meet the reliability objective. This will enable NERC staff to ensure the completeness of SARs so that Reliability Standards are developed that appropriately mitigate risk.

In the future, if there are any further proposals to change parts of the SPM, we ask NERC to keep the Board informed and seek its input but complete the Reliability Standards approval process prior to seeking Board endorsement.

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

BPA proposes that NERC expand the registered entities as penetration of Inverter Based Resources (IBRs) and battery storage are increasing rapidly and the traditional fossil fuel generation are retiring. The current 75MVA threshold is too high as many of these resources are smaller size. Also there are no standards requirements for an Aggregator. The owner and operators of these facilities need to be included in the registered entities criteria. BPA feels continuing to place these requirements on TOs/TOPs and BAAs is not an effective and efficient mode to maintain reliability of the grid due to jurisdictional boundaries.

BPA feels that there is continued need for further outreach by NERC to stakeholders at all levels: executives, management and subject matter experts. There appears to be a gap between sector representation and the ballot body segments. This gap needs to be further discussed to make sure there is open and trustworthy communication in place prior to standard approval processes.

BPA supports having technical subject matter experts as members of the standards drafting team. BPA would like to see increased focus on minimizing language that is not clear, as ambiguity allows various interpretations of what is written and can lead to frustration and confusion.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

MRO NSRF does not have any additional comments.

Likes 0

Dislikes 0

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Document Name

Comment

PG&E wishes to thank NERC for listening and responding to industry input on the first draft of the Standards Process Manual modifications, to make these modifications an excellent product.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer

Document Name

Comment

Duke Energy supports the revisions, and thanks NERC for the consideration of comments received in the first draft.

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Document Name

Comment

MidAmerican thanks NERC for its responsiveness to previous industry comments.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Document Name

Comment

N/A

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We support the proposed changes.

Likes 0

Dislikes 0

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer

Document Name

Comment

In multiple locations there are Steps that it states, "if criteria are met". It is not clear what is meant by criteria.

Section 4.1 the last condition, recommend adding. "The draft team is proposing no further changes (including ministerial changes) to the balloted document."

Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process.

Section 10.0 Recommend adding in the first paragraph. "described in Section 4.0 (which is based off the ANSI method) for developing.....".

Section 13.0 There should be at least a minimum review period referenced. For example, "periodically, not to exceed 10 years".

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer

Document Name

Comment

Section 4.1 the last condition, recommend adding. "The draft team is proposing no further changes (including ministerial changes) to the balloted document."

Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process.

Section 10.0 Recommend adding in the first paragraph. "described in Section 4.0, which is based off the ANSI method, for developing.....".

Section 13.0 There should be at least a minimum review period referenced. For example, "periodically, not to exceed 10 years".

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG support NPCC RSC comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer

Document Name

Comment

SMUD appreciates NERC's effort to thoughtfully consider the comments provided in the initial ballot of the 2023 Revisions to Standard Processes Manual and propose changes that align with nearly all of industry's concerns.

Likes 0

Dislikes 0

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	
Document Name	
Comment	
Thanks to the team for considering stakeholder input during the revision design process.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	

Comments Submitted by Hydro One Networks, Inc.

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC’s process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

Yes

No

Comments: The proposed changes to remove ANSI-accreditation of NERC Reliability Standards will negatively impact NERC’s obligation to maintain a standards development process that is open, transparent and fair to all industry participants. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

- Yes
 No

Comments: **The Standards Committee should incorporate in detail, as part of this SPM revision, the expectations and procedure for vetting in the industry the SARs identified in Section 4.2 bullet point 1.**

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

- Yes
 No

Comments: **None**

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

- Yes
 No

Comments: **None**

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

- Yes
 No

Comments: **None**

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

- Yes
 No

Comments: **None**

7. Please provide any other comments for the team to consider, if desired.

Comments: **None**

Comments submitted by Orlando Utilities Commission

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

Yes
 No

Comments: **None.**

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

Yes
 No

Comments: **None**

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

Yes
 No

Comments: **None**

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

Yes
 No

Comments: **I commented yes to everything except the removal of the final ballot. The succinct version is I object to the removal of the final ballot requirement because it removes transparency from the process and the opportunity for industry to review comments provided by others. Having served on several teams I know there is a lot of pressure, naturally so, once a positive vote is received to settle for the standard being "good enough" and make no more changes. However that could leave on the table an aspect that only a minority of industry discovered, or a minority is unnecessarily burdened by. The final ballot allows industry to weigh in if they believe the SDT should have addressed that minority concern instead of passing over it because the standard was "good enough" to pass.**

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

Yes
 No

Comments: **None**

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

Yes

No

Comments: **None**

7. Please provide any other comments for the team to consider, if desired.

Comments: **None**