

Consideration of Comments

Project 2014-03 Revisions to TOP and IRO Standards

The Project 2014-03 Drafting Team thanks all commenters who submitted comments on SAR. These standards were posted for a 30-day public comment period from February 21, 2014 through March 24, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 24 sets of comments, including comments from approximately 103 different people from approximately 73 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

The SDT has made the following changes to the SAR as a result of industry comments:

- Modified the language to show that the intent of the SAR is simply to evaluate how best to respond to the directive in Order 693, paragraph 1855.
- Added the SW Outage Report as another source of input to the SDT deliberations.
- Added the Transmission Service Provider, Transmission Owner, and Interchange Authority to the list of applicable entities.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Wayne Johnson	Southern Company: Southern Company Service, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	X		X		X	X				
No Additional Responses													
2.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member		Additional Organization	Region	Segment Selection									
1.	Alan Adamson	New York State Reliability Council	NPCC	10									
2.	David Burke	Orange and Rockland Utilities Inc.	NPCC	3									

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
3.	Greg Campoli	New York Independent System Operator	NPCC	2																
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1																
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1																
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
8.	Kathleen Goodman	ISO - New England	NPCC	2																
9.	Michael Jones	National Grid	NPCC	1																
10.	Mark Kenny	Northeast Utilities	NPCC	1																
11.	Christina Koncz	PSEG Power LLC	NPCC	5																
12.	Helen Lainis	Independent Electricity System Operator	NPCC	2																
13.	Michael Lombardi	Northeast Power Coordinating Council	NPCC	10																
14.	Alan MacNaughton	New Brunswick Power Corporation	NPCC	9																
15.	Bruce Metruck	New York Power Authority	NPCC	6																
16.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																
17.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																
18.	Robert Pellegrini	The United Illuminating Company	NPCC	1																
19.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																
20.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																
21.	Brian Robinson	Utility Services	NPCC	8																
22.	Ayesha Sabouba	Hydro One Networks Inc.	NPCC	1																
23.	Brian Shanahan	National Grid	NPCC	1																
24.	Wayne Sipperly	New York Power Authority	NPCC	5																
25.	Ben Wu	Orange and Rockland Utilities, Inc.	NPCC	1																
26.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																
3.	Group	Joseph DePoorter	MRO NERC Standards Review Forum		X	X	X	X	X											
	Additional Member	Additional Organization	Region	Segment Selection																
	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6																
	Chuck Wicklund	Otter Tail Power Company	MRO	1, 3, 5																
	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6																
	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6																
	Kayleigh Wilkerson	Lincoln Electric System	MRO	1, 3, 5, 6																

Group/Individual	Commenter	Organization		Registered Ballot Body Segment											
				1	2	3	4	5	6	7	8	9	10		
Jodi Jensen	Western Area Power Administration	MRO	1, 6												
Joseph DePoorter	Madison Gas and Electric	MRO	3, 4, 5, 6												
Ken Goldsmith	Alliant Energy	MRO	4												
Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5, 6												
Marie Knox	Midcontinent Independent System Operator	MRO													
Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6												
Randi Nyholm	Minnesota Power	MRO	1, 5												
Scott Bos	Muscatine Power & Water	MRO	1, 3, 5, 6												
Scott Nickels	Rochester Public Utilities	MRO	4												
Terry Harbour	MidAmerican Energy	MRO	1, 3, 5, 6												
Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6												
Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5												
4.	Group	Randi Heise	Dominion		X		X		X	X					
	Additional Member	Additional Organization	Region Segment Selection												
	Louis Slade	Dominion	RFC 5, 6												
	Mike Garton	Dominion	NPCC 5, 6												
	Connie Lowe	Dominion	MRO 6												
	Michael Crowley	Dominion	SERC 1, 3, 5, 6												
5.	Group	Kathleen Black	DTE Electric			X	X	X							
	Additional Member	Additional Organization	Region Segment Selection												
	Kent Kujala	NERC Compliance	RFC 3												
	Daniel Herring	NERC Training & Standards Development	RFC 4												
	Mark Stefaniak	Regulated Marketing	RFC 5												
	Barbara Holland	SOC	RFC												
6.	Group	Michael Lowman	Duke Energy		X		X		X	X					
	Additional Member	Additional Organization	Region Segment Selection												
	Doug Hils		RFC 1												
	Lee Schuster		FRCC 3												
	Dale Goodwine		SERC 5												

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
Greg Cecil		FRCC	6										
7.	Group	Frank Gaffney	Florida Municipal Power Agency	X		X	X	X					
Additional Member		Additional Organization	Region	Segment Selection									
	Tim Beyrle	City of New Smyrna Beach	FRCC	4									
	Jim Howard	Lakeland Electric	FRCC	3									
	Greg Woessner	Kissimmee Utility Authority	FRCC	3									
	Lynne Mila	City of Clewiston	FRCC	3									
	Cairo Vanegas	Fort Pierce Utility Authority	FRCC	4									
	Randy Hahn	Ocala Utility Service	FRCC	3									
	Stanley Rzad	Keys Energy Service	FRCC	1									
	Don Cuevas	Beaches Energy Services	FRCC	1									
	Mark Schultz	City of Green Cove Springs	FRCC	3									
8.	Group	Bob Reynolds	SPP RE										X
No Additional Responses													
9.	Group	Jason Marshall	ACES Standards Collaborators						X				
Additional Member		Additional Organization	Region	Segment Selection									
	1. Bill Hutchison	Southern Illinois Power Cooperative	SERC	1									
	2. Scott Brame	North Carolina Electric Membership Corporation	SERC	1, 3, 4, 5									
	3. Mohan Sachdeva	Buckeye Power	RFC	3, 4									
	4. Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5									
	5. Ellen Watkins	Sunflower Electric Power Corporation	SPP	1									
	6. John Shaver	Arizona Electric Power Cooperative	WECC	4, 5									
	7. John Shaver	Southwest Transmission Cooperative	WECC	1									
	8. Bob Solomon	Hoosier Energy	RFC	1									
10.	Group	Andrea Jessup	Bonneville Power Administration	X		X		X	X				
Additional Member		Additional Organization	Region	Segment Selection									
	Rich Ellison	Dispatch	WECC	1									
	Chris Higgins	Dispatch	WECC	1									
11.	Group	Robert Rhodes	SPP Standards Review Group		X								

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
Additional Member		Additional Organization	Region	Segment Selection									
Allan George		Sunflower Electric Power Corporation	SPP	1									
Stephanie Johnson		Westar Energy	SPP	1, 3, 5, 6									
Mike Kidwell		Empire District Electric	SPP	1, 3, 5									
Allen Klassen		Westar Energy	SPP	1, 3, 5, 6									
Kevin Ninceheler		Westar Energy	SPP	1, 3, 5, 6									
Valerie Pinamonti		American Electric Power	SPP	1, 3, 4, 5									
Mahmood Safi		Omaha Public Power District	MRO	1, 3, 5									
Don Schmit		Nebraska Public Power District	MRO	1, 3, 5									
J. Scott Williams		City Utilities of Springfield	SPP	1, 4									
12.	Individual	Chris Scanlon	Exelon	X		X	X	X	X				
13.	Individual	Patti Metro	National Rural Electric Cooperative Association (NRECA)	X		X	X						
14.	Individual	Christina Conway	Oncor Electric Delivery Company LLC	X									
15.	Individual	Michael Falvo	Independent Electricity System Operator		X								
16.	Individual	Andrew Z. Pusztai	American Transmission Company, LLC	X									
17.	Individual	Thomas Foltz	American Electric Power	X		X		X	X				
18.	Individual	Dave Willis	Idaho Power	X									
19.	Individual	Doug Hohlbaugh	FirstEnergy	X		X	X	X	X				
20.	Individual	Catherine Wesley	PJM Interconnection		X								
21.	Individual	Brett Holland	Kansas City Power & Light	X		X		X	X				
22.	Individual	Jo-Anne Ross	Manitoba Hydro	X		X		X	X				
23.	Individual	Richard Vine	California ISO		X								
24.	Individual	Kenneth A Goldsmith	Alliant Energy				X						

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Organization	Agree	Supporting Comments of "Entity Name"
N/A	N/A	N/A

1. Do you agree with the scope and contents of the SAR? If not, please provide specific comments and suggestions for SDT consideration.

Summary Consideration: The SAR is proposing to evaluate how to respond to the directive in Order 693, paragraph 1855. It is not a commitment to add requirements anywhere but simply to address the directive within this project. It is not a commitment to add requirements anywhere but simply to address the directive within this project. The directive links back to the TOP and IRO standards as it points to the fact that this issue isn't covered within those standards. If a change to standards is required, now that the IRO standards are opened up through this SAR and project, it may make sense to resolve the issue within the IRO standards as opposed to the VAR standards. If the issue can't be handled within this project, the directive will be returned to the VAR team. To clarify this, the language in the SAR has been modified.

Address the following directive from Order 693, paragraph 1855:

Organization	Yes or No	Question 1 Comment
Southern Company: Southern Company Service, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	Southern Company proposes removing Item #5 from the SAR. First, Southern Company does not believe the scope of the SAR should include monitoring responsibilities for the Reliability Coordinator in the IRO family of standards. Southern Company agrees with NERC regarding the monitoring functions being an intrinsic part to the Reliability Coordinator's role. NERC proposed the retirement of Reliability Standard IRO-002-2 Requirements R4, R5, R6, and R7, which address real-time monitoring and analysis capabilities and functions required to enable the reliability coordinator to perform its responsibilities. NERC also believes these requirements are unnecessary because they are inherent in the reliability coordinator's duty to maintain area control error or operate within IROs/SOLs and can be verified in the certification process. Likewise, Southern Company agrees with NERC and believes that there are requirements that require operation within SOLs and IROs, which are more

Organization	Yes or No	Question 1 Comment
		<p>“results based.” It is not practical to have a requirement to measure real-time monitoring nor is this necessary. The real reliability objective is to operate within identified parameters as required in IRO-005-3.1a, IRO-006_EAST-1, IRO-008-1, IROL-009-1, PER-005-1, TOP-001-2, TOP-002-2.1b, TOP-004-2, TOP-007-0, TOP-008-1, VAR-001-3, not to monitor.</p> <p>Secondly, as it relates to modifying the TOP and/or IRO standards to specifically assure that voltage and reactive resources are being maintained, there are multiple existing standards that require the Reliability Coordinator to establish and operate within SOL/IROLS, which include operating within system voltage limits. Modifying the TOP and/or IRO standards as shown in #5 of the SAR creates redundancy with existing standards, which goes against the Paragraph 81 principles. See the following standards that require the Reliability Coordinator to operate within SOLs and IROLS:</p> <ul style="list-style-type: none"> o FAC-011-2: The purpose of FAC-011-2 states, “To ensure that System Operating Limits (SOLs) used in the reliable operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.” Since this requires documented methodology for SOLs, which includes system voltage limits, modifying the TOP and/or IRO standards as shown in #5 of the SAR would create redundancy with FAC-011-2. o FAC-014-2: The purpose of FAC-014-2 states, “To ensure that System Operating Limits (SOLs) used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.” Since this standard requires establishment of SOLs and IROLS, which includes system voltage limits, modifying the TOP and/or IRO standards as shown in #5 of the SAR would create redundancy with FAC-014-2.

Organization	Yes or No	Question 1 Comment
		o IRO-008-1 R1: Modifying the TOP and/or IRO standards as shown in #5 of the SAR would create redundancy with IRO-008-1 R1 that requires RCs to perform assessments to ensure they do not exceed IROs, which includes system voltage limits.
MRO NERC Standards Review Forum	No	This SAR is to respond to a NOPR concerning various TOP and IRO standards. The NSRF does not see how Item 5 in the “Detailed Description” should be included in the scope of this SAR. The FERC directive referenced discusses adding the Reliability Coordinator as an applicable entity in VAR-001 and does not tie it back to the TOP or IRO standards. Please remove item 5 from the detailed description
Alliant Energy	No	This SAR is to respond to a NOPR concerning various TOP and IRO standards. Alliant Energy does not see how Item 5 in the “Detailed Description” should be included in the scope of this SAR. The FERC directive referenced discusses adding the Reliability Coordinator as an applicable entity in VAR-001 and does not tie it back to the TOP or IRO standards. Please remove item 5 from the detailed description.
<p>Response: The SAR is proposing to evaluate how to respond to the directive. It is not a commitment to add requirements anywhere but simply to address the directive within this project. The directive links back to the TOP and IRO standards as it points to the fact that this issue isn’t covered within those standards. If a change to standards is required, now that the IRO standards are opened up through this SAR and project, it may make sense to resolve the issue within the IRO standards as opposed to the VAR standards. If the issue can’t be handled within this project, the directive will be returned to the VAR team. To clarify this, the language in the SAR has been modified.</p> <p>Address the following directive from Order 693, paragraph 1855:</p>		
Northeast Power Coordinating Council	No	TOP-001-2 Requirements R1 and R2 have wording issues that could result in double-jeopardy for non-compliance. The original language provided for a very narrow limitation on the reasoning and the contact; and they were tied together. This language allows for the potentially different reasoning being

Organization	Yes or No	Question 1 Comment
		<p>allowed for one’s inability to provide notice. If each function needs to be separate, then Requirement R4 should be made into two requirements. Who’s to say that the information is requested AND available?</p> <p>TOP-002 contains a potential conflict with FERC Order 888, requiring TOPs provide GOs with information about their role in SOL mitigation plans. The SAR must address these concerns.</p>
<p>Response: The comments will be passed to the SDT for consideration during development.</p>		
Florida Municipal Power Agency	No	<p>FMPA has only one comment on the SAR, and that is to not only address comments/input from the technical conference, but also the comments/input requested from industry related to the technical conference issues, and other issues raised by those commenters.</p>
<p>Response: The SDT will respond to all issues raised for this project regardless of whether they are explicitly noted or not. It is probably a fruitless exercise to try to list all possible sources but for additional clarity, the SDT has added the SW Outage Report as another source.</p>		
American Transmission Company, LLC	No	<p>When reviewing the proposed SAR, there is a series of IRO Reliability Standards listed in “Related Standards” section on pg.6 of the SAR, however, no reference to the TOP Standards. (see list below)</p> <ul style="list-style-type: none"> o TOP-001-2-Transmission Operations o TOP-002-3-Operations Planning o TOP-003-2-Operational Reliability Data <p>These TOP Standards are referenced in the FERC NOPR and also contained in the subject SAR Information (Industry Need).These TOPs are further described as part of the “Detailed Description” where the SDT Shall:1. Revise the TOP/IRO Reliability Standards filed under Projects 2007-03 and 2006-06 to address concerns expressed in the NOPR. ATC also noted that</p>

Organization	Yes or No	Question 1 Comment
		<p>the three TOPs listed above are included in the project tracking Spreadsheet found within the Weekly Standards Bulletin. Based on the above information, ATC recommends that the SDT consider adding the three TOPs listed above as “Related Standards” which are subject to revision as part of the scope for this Standards Project.</p> <p>a. Use the inputs from technical conferences to advise actions</p>
<p>Response: The three TOP standards referenced are part of the base project as shown in the details of the SAR and as such do not belong in the ‘Related Standards’ section of the SAR. That section shows standards that are not part of the base project and which might have to be revised in order to conform to changes made in the original subject TOP and IRO standards. No change made to the SAR.</p> <p>The SDT is obligated to use the inputs from the technical conferences.</p>		
American Electric Power	No	<p>AEP agrees with the overall approach taken by NERC to solicit industry input in addressing FERC’s concerns, however the current SAR lacks specificity, as it is not clear exactly how NERC proposes the identified standards be changed. AEP will reserve any agreement with the SAR until it is further developed.</p>
<p>Response: The SAR did not contain any proposed changes to the standards in question because the Technical Conferences were to provide input to the SDT as to what those changes should be. The SAR sets up the scope of work.</p>		
Idaho Power	No	<p>I do not believe that the SDT should address the goals in Project 2009-02. Address the FERC directives for the November 21, 2013 NOPR without increasing the scope of the project.</p>
<p>Response: The SAR provides discretion to the SDT in handling the goals of Project 2009-02 as needed but doesn’t mandate its inclusion in this project.</p>		
Duke Energy	Yes	<p>Duke Energy agrees with the scope of this project.</p>

Organization	Yes or No	Question 1 Comment
ACES Standards Collaborators	Yes	We support the concept of deferring action on the standards to allow industry and NERC to address FERC concerns with the standards. Therefore, we are supportive of the SAR since its primary purpose is to address the concerns raised in the FERC NOPR. Since both of the original standards projects were initiated many years ago, much has changed with NERC’s compliance and enforcement programs and standards processes. Reviewing the standards with these latest programs and processes in consideration makes sense at this juncture.
National Rural Electric Cooperative Association (NRECA)	Yes	NRECA filed in support the NERC filing to defer action on the subject TOP and IRO standards to allow industry and NERC to address FERC concerns with the standards. In doing so, NRECA agrees with the scope of the SAR since its primary purpose is to address the concerns raised in the FERC NOPR.
Oncor Electric Delivery Company LLC	Yes	Refer to Oncor’s TOP/IRO Technical Conference comments for specific suggestions and recommendations for the SDT to consider.
PJM Interconnection	Yes	PJM supports the scope and approach of the SAR which will look to include other applicable standards, i.e., IRO standards, in response to FERC’s remand of the TOP and IRO standards included in their NOPR issued November 21, 2013. PJM supported the revised TOP and IRO standards as submitted to the FERC in April, 2013 as they provided the correct authority and responsibilities for real time operations. To maintain the intent of those revised standards and to appropriately address the FERC’s concerns in the NOPR, this SAR is employing a sound approach to review all applicable standards to assure situational awareness, maintain results-based standards and eliminate overlap in responsibilities and not delay response to real time operational issues that may have negative consequences.

Organization	Yes or No	Question 1 Comment
Manitoba Hydro	Yes	No comments
Dominion	Yes	
DTE Electric	Yes	
SPP RE	Yes	
Bonneville Power Administration	Yes	
SPP Standards Review Group	Yes	
Exelon	Yes	
Independent Electricity System Operator	Yes	
FirstEnergy	Yes	
Kansas City Power & Light	Yes	
California ISO	Yes	
Response: Thank you for your support.		

2. Are you aware of any regional variances associated with approved NERC Reliability Standards that will be needed as a result of this project? If yes, please identify the Regional Variance

Summary Consideration: No regional variances have been identified for relevance to this SAR.

Organization	Yes or No	Question 2 Comment
FirstEnergy	No	FE is not currently aware of any variance need, but the scope of the SAR should permit flexibility to add a variance within the development process to the extent required. The need for a variance may not arise until proposed requirements are reviewed by industry.
Response: The development process allows for the consideration of a variance at any time.		
Manitoba Hydro	No	No comments
Southern Company: Southern Company Service, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
Northeast Power Coordinating Council	No	

Organization	Yes or No	Question 2 Comment
MRO NERC Standards Review Forum	No	
Dominion	No	
DTE Electric	No	
Duke Energy	No	
Florida Municipal Power Agency	No	
SPP RE	No	
ACES Standards Collaborators	No	
Bonneville Power Administration	No	
SPP Standards Review Group	No	
Exelon	No	
National Rural Electric Cooperative Association (NRECA)	No	
Oncor Electric Delivery Company LLC	No	

Organization	Yes or No	Question 2 Comment
Independent Electricity System Operator	No	
American Transmission Company, LLC	No	
American Electric Power	No	
Idaho Power	No	
PJM Interconnection	No	
Kansas City Power & Light	No	
California ISO	No	
Alliant Energy	No	
Response: Thank you for your response.		

3. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements

Summary Consideration: No changes are required to the SAR due to concerns for Canadian provincial or regulatory requirements.

Organization	Yes or No	Question 3 Comment
Manitoba Hydro	No	No comments
Southern Company: Southern Company Service, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
Northeast Power Coordinating Council	No	
MRO NERC Standards Review Forum	No	
Dominion	No	
DTE Electric	No	

Organization	Yes or No	Question 3 Comment
Duke Energy	No	
Florida Municipal Power Agency	No	
SPP RE	No	
ACES Standards Collaborators	No	
Bonneville Power Administration	No	
SPP Standards Review Group	No	
Exelon	No	
National Rural Electric Cooperative Association (NRECA)	No	
Oncor Electric Delivery Company LLC	No	
Independent Electricity System Operator	No	
American Transmission Company, LLC	No	
American Electric Power	No	

Organization	Yes or No	Question 3 Comment
Idaho Power	No	
FirstEnergy	No	
PJM Interconnection	No	
Kansas City Power & Light	No	
Alliant Energy	No	
Response: Thank you for your response.		

4. Are there any other concerns with this SAR?

Summary Consideration: The SDT has added the Transmission Owner and Interchange Authority to the list of applicable entities due to industry comments pointing out that those two entities are applicable entities in proposed TOP-003.

Organization	Yes or No	Question 4 Comment
Dominion	Yes	Under the Reliability Functions; TO and IA are not selected. The TO and IA are applicable entities in TOP-003-2 and Dominion suggests selecting these entities.
Response: The SDT agrees and has made the indicated change.		
California ISO	Yes	<p>When developing the specific standards associated with this SAR the drafting team should consider the following:</p> <ol style="list-style-type: none"> 1. TOPs should operate to all SOLs, and not just a subset of SOLs. 2. The RC should have the primary responsibility for development of all IROLs. TOPs have an obligation and capability to develop SOLs. However, IROLs are a very specific subset of SOLs which require a wide area view to determine. In addition, there are IROLs that cross TOP boundaries which are therefore more suited to be identified by the RC. 3. SOLs should not all require complete mitigation within 30 minutes, as is required for more limiting IROLs. 4. The revised standards should address outage coordination as well. The RC should be required to create the overall outage coordination process and the TOP and BA should be required to follow the process.

Organization	Yes or No	Question 4 Comment
		<p>5. The SDT should define "unknown operating state" within the revised standards. If this term cannot be adequately defined then it should not be used in the standard.</p> <p>6. All TOPs should be required to know if they are not in a secure state (a state with acceptable N-1 performance). This will require that all TOPs have tools with the same (or similar) capability as RTCA.</p>
<p>Response: The comments will be passed to the SDT for consideration during development.</p>		
ACES Standards Collaborators	No	We have no additional comments. Thank you for the opportunity to comment.
SPP Standards Review Group	No	We do not take issue with the SAR believing it provides very good coverage for the task at hand but we will be filing comments later on the Technical Conferences.
Oncor Electric Delivery Company LLC	No	Refer to Oncor’s TOP/IRO Technical Conference comments for specific suggestions and recommendations for the SDT to consider.
Kansas City Power & Light	No	We do not take issue with the SAR believing it provides very good coverage for the task at hand but we will be filing comments later on the Technical Conferences.
Manitoba Hydro	No	No comments
Southern Company: Southern Company Service, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company	No	

Organization	Yes or No	Question 4 Comment
Generation and Energy Marketing		
Northeast Power Coordinating Council	No	
MRO NERC Standards Review Forum	No	
DTE Electric	No	
Duke Energy	No	
Florida Municipal Power Agency	No	
SPP RE	No	
Bonneville Power Administration	No	
Exelon	No	
National Rural Electric Cooperative Association (NRECA)	No	
Independent Electricity System Operator	No	
Idaho Power	No	

Organization	Yes or No	Question 4 Comment
FirstEnergy	No	
Alliant Energy	No	
Response: Thank you for your support.		

END OF REPORT