Name (50 Responses)
Organization (50 Responses)
Lead Contact (22 Responses)
Contact Organization (22 Responses)
Question 1 (65 Responses)
Question 1 Comments (72 Responses)
Question 2 (65 Responses)
Question 2 Comments (72 Responses)
Question 3 (61 Responses)
Question 3 Comments (72 Responses)
Question 4 (65 Responses)
Question 4 Comments (72 Responses)
Question 5 (61 Responses)
Question 5 Comments (72 Responses)
Question 6 (61 Responses)
Question 6 Comments (72 Responses)
Question 7 (63 Responses)
Question 7 Comments (72 Responses)

Individual
John Bee
Exelon
Yes
Yes
Yes
Yes
This may be a burden on small entities and generators because they would need to use contractors to run studies in order to obtain the required data. Smaller entities and generators may not have the expertise, the software or the necessary personnel to perform studies.
No
No
No
Group
Guy Zito
Northeast Power Coordinating Council
No
How an exception application will be assessed by the RE and NERC is not addressed in the document. Stakeholders need to know how the exception application will be evaluated and processed. Suggest that the SDT develop a reference or a guidance document as part of the RoP that will provide guidance to Registered Entities, Regional Entities and the ERO on how an exception application will be processed. Of particular concern is the lack of clarity and specificity with respect to what analyses and study results are required under the third bullet on page 1 and under question 4 on both pages 2 and 4. This lack of clarity and specificity will lead to inconsistent application of the Technical Principles by both Registered Entities and Regional Entities. We recommend the following: the impact and performance analyses required by the 3rd bullet on page 1 and by #4 on pages 2 and 4 should be stipulated to be all analyses, scenarios, and contingencies required under NERC Standard TPL-002-1 with the “exception element” removed from the base system model. Entities shall report on all key

performance measures of BES reliability specified in the TPL-002-1 attributable to the removed “exception element”. On page 1 under General Instructions, it is stated that: “A one-line breaker diagram identifying the facility for which the exception is requested must be supplied with every application. The diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested.” What is meant by interface points?
No
For question 2 on page 2 For Transmission Facilities: • What standards will define the “impact”? • What is a material impact and a non-material impact? • What kinds and types of impacts are acceptable/unacceptable? • How are impacts determined? Question 6 on page 3 reads “Is the facility part of a Cranking Path associated with a Blackstart Resource?”, suggest removing the reference to “Cranking Path” because the Drafting Team does not require that the BES be contiguous, and black start resource Cranking Paths were deleted from Inclusion I3. Question 7 on page 3 asks, “Does power flow through this facility into the BES?” This can only apply to a Local Network with two or more connections to the BES. No power should normally flow through a Local Network (or Radial system) to another portion of the BES. There may be occasional, brief reverse power flows may be acceptable during short periods under abnormal operating conditions. Question 7 also requests “data for the most recent consecutive two calendar year period.” Why is two years worth of data necessary? One year of data would be sufficient. From Question 7, “what is the minimum and maximum magnitude of the power flow out of the facility …” What is intended by the use of magnitude? Suggest that the Drafting Team adopt the FERC Seven Factor test for question 7. Suggest deleting the “% of the calendar year” check boxes in favor of a statement either that power does not flow through the Local Network, or alternatively, a blank space for reporting the net peak MWs and MWHs transferred annually through the facility, and the percentage of these transferred amounts to the peak and annual MWH demands served by the Local Network. Suggest requesting only one year (8,760 hours) of data covering four seasons, including Summer and Winter capability periods.
No
This Application generally applies to traditionally fueled generating facilities. Application form and justifications would be required for non-traditional resources such as solar and wind? Question 2 on page 4 asks, “Is the generator or generator facility used to provide Ancillary Services?” If some of these Generator check list items are market-related and not reliability-related, they should not be present. If the Ancillary Services are reliability-related, please explain their relation to BES reliability. Suggest inserting the word “reliability” before the words “must run” in question 3. Question 5 on page 4 asks, “Does the generator use the BES to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load?” This could mean the generator may serve local loads through non-BES facilities. In order to serve these local loads the generator would need to be connected to a Radial system, a Local Network or to local distribution facilities. Is this what is intended? Were there any other possibilities envisioned by the BES SDT?
No
According to the Applicability section, the TPL Reliability Standards are only applicable to the Planning Coordinator (PC) and the Transmission Planner (TP). Was it the BES SDT’s assumption that Applicants would have the PC or TP run studies for them, or that all Applicants would gain access to those models and run the models themselves? (Ref. TPL-002-1b, Applicability: Planning Authority, and Transmission Planner.)
Yes
There is no guidance provided as to how the information asked for in this form will be evaluated, and what the decision making process will entail. As such, a reference document should be developed and provide some guidance how to evaluate applications. Suggest that the BES SDT adopt the FERC Seven Factor test.
No
No
Group
Charles Long

Entergy Services, Inc.
Yes
Yes
Yes
No
No
No
No
Individual
Eric Lee Christensen
Snohomish County PUD
Yes
SNPD agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. SNPD is concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. SNPD envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. SNPD suggests that a generic example of a completed form be provided to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
SNPD agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest three modifications to the proposed language to ensure consistency with Section 215 of the Federal Power Act, with the BES Definition, and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) SNPD suggests that a new question should be added concerning the function of the facility, which would read: "Does the facility function as a local distribution facility rather than a Transmission facility? If yes, please provide a detailed explanation of your answer." Section 215(a)(1) of the FPA makes clear that "facilities used in the local distribution of electric energy" are excluded from the BES, 16 U.S.C. § 824o(a)(1), and the most recent draft of the BES definition incorporates the same language. SNPD believes a question to address the function of the Element or system subject to an Exception Request is necessary to determine whether the Element or system is "used" in local distribution and thereby to ensure that this statutory limit on the BES is observed in the Exceptions process. Further, we believe a variety of information may be relevant to determining whether a particular facility functions as local distribution rather than as part of the BES. For example, if power is not scheduled across the facility or if capacity on the system is not posted on the relevant OASIS, it is likely to function as local distribution, not transmission. Similarly, if power enters the system and is delivered to load within the system rather than moving to load located on another system, its function is local distribution rather than transmission. SNPD proposes the language above as an open-ended question so that the entity submitting the Exceptions Request can provide this and any other information it deems relevant to facility function. (2) SNPD suggests modifying question 6 to "Is the facility part a designated Cranking Path associated with a Blackstart Resource identified in a

Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition, which removes the reference to "Cranking Paths," and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (3) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: "Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request." While SNPD believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

Yes

SNPD agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. SNPD suggests three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, SNPD suggests modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: "Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request." This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.

Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the RE receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.

Yes

As discussed in our responses to Questions 1 through 3, SNPD believes that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.

Yes
As discussed in more detail in our response to Question 2, SNPD believes it is necessary to address the function of an Element or system that is subject to an Exceptions Request to determine whether it is a “facilit[y] used in the local distribution of electric energy” and therefore excluded from the BES under Section 215(a)(1) of the Federal Power Act.
No
As a general matter, SNPD believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. SNPD also supports the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. SNPD agrees that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the REs.
Individual
Greg Rowland
Duke Energy
No
Need to include identification of any System Protection Coordination considerations per PRC-001-1. Also, we believe that a system map showing the geographical location of the facility(s) should be supplied with the request.
No
Modify wording on #3 as follows: “Please provide the appropriate list for the operating area where the facility is located.” Modify the wording on #6 as follows: “Is the facility part of a Cranking Path identified in an entity’s restoration plan for a Blackstart Resource as required by EOP-005-2?”
No
Modify wording on #3 as follows: “Please provide the appropriate reference for the operating area where the facility is located.”
Yes
What is the process for obtaining data from a 3rd party that is either unregistered or unwilling to supply the data?
No
No
No
Group
Brent Ingebrigtson
LG&E and KU Energy
Yes
LG&E and KU Energy request clarification as to how the two year data requirement would apply to a

new facility for which the owner/operator requests an exemption.
Individual
Richard Salgo
NV Energy
Yes
Yes
No
In question #7 of the form, it would be useful to the analysis for technical exception to include not only the minimum and maximum power flow out of the candidate facility, but also a description or demonstration of the “typical” magnitude or the “average” of such flow. An entity may provide this sort of information anyhow, but a prompt for this type of information could be useful and prevent having to solicit more information during the review.
No
The information appears to be readily available to entities seeking exceptions.
No
No
No
Group
Jean Nitz
ACES Power Marketing
No
The first sentence only refers to element(s) designated as excluded. Element(s) designated as included under the BES definition, shouldn’t have to go through the exception process either.
No
Q1, Q5 and Q6 have a “Description/Comments” section. What type of information should be included under the Description for each of these questions? Providing more guidance here would help achieve the “standardization, clarity and continuity of process” that we seek. Regarding Q2: A permanent flowgate should not be part of the detailed information to support an exception. First, there is no definition for what constitutes a permanent flowgate. Second, flowgates are often created for a myriad of reasons that have nothing to do with them being necessary to operate the BES. While section c) in E3 attempts to limit the applicability to permanent flowgates, there is no definition for what constitutes a permanent flowgate particularly since no flowgate is truly permanent. The NERC Glossary of Terms definition of flowgate includes flowgates in the IDC. This is a problem because flowgates are included in the IDC for many reasons not just because reliability issues are identified. Flowgates could be included to simply study the impact of schedules on a particular interface as an example. It does not mean the interface is critical. As an example, it could be used to generate evidence that there are no transactional impacts to support exclusion from the BES. Furthermore, the list of flowgates in the IDC is dynamic. The master list of IDC flowgates is updated monthly and IDC users can add temporary flowgates at anytime. While the "permanent" adjective applied to flowgates probably limits the applicability from the “temporary” flowgates, it is not clear which of the monthly flowgates would be included from the IDC since they might be added one month and removed another. Flowgates are created for many reasons that have nothing to do with them being necessary to operate the BES. First, flowgates are created to manage congestion. The IDC is more of a congestion management tool than a reliability tool. FERC recognized this in Order 693, when they directed NERC to make clear in IRO-006 that the IDC should not be relied upon to relieve IROLs that have been violated. Rather, other actions such as re-dispatch must be used in conjunction. Second, flowgates are used as a convenient point to calculate flows to sell transmission service. The characteristics of the flowgate make it a good proxy for estimating how much contractual use has

been sold not necessarily how much flow will actually occur. While some flowgates definitely are created for reliability issues such as IROLs, many simply are not. We are unclear about what “an appropriate list” in Q3 is supposed to be. Is it supposed to be a list of all IROLs or only those for which the answer is yes? Why is a list even necessary since the answer to the question answers Exclusion E3.c? If the answer is no, is this asking the submitter to prove the negative?
No
Q5 has a “Description/Comments” section. Further clarification on what type of information to include under the Description would help “standardize” the supporting information and “will provide more clarity and continuity to the process.” The definition of ancillary services varies and can be quite broad. It can include reactive power and voltage support for example. All generators provide some reactive power and voltage support. Thus, ancillary services should be further defined or one could construe it to limit any generator from being excepted.
Yes
Some generation owners may not be able to obtain their BA’s most severe single Contingency. Many generator owners will not have access to the data necessary to demonstrate the reliability impact to the BES. This is particularly true for transmission dependent utilities.
No
Yes
Some organized markets have a must run concept that has nothing to do with reliability. Thus, Q3 for generation facilities might be confused with these tariff provisions.
No
Individual
Thomas C. Duffy
Central Hudson Gas & Electric Corporation
Yes
Yes
Yes
No
No
No
Yes
The ‘Technical Principles for Demonstrating BES Exceptions’ process was intended to establish technical exception ‘criteria’ which would be used by the industry to understand what facilities would qualify for inclusions and exclusions from the BES. What has been produced, however, is essentially a listing of ‘electrical system indicators’, identified on the form, which may be material to making a decision regarding, ‘is it BES or not’. The thresholds (or acceptable values) for the indicators, however, have not been determined. It is understood that in Phase II of the BES Definition development process, the SDT will attempt to address these issues but until that work has been completed, the industry will remain enmeshed in confusion and inefficient application of resources and funding. Without these criteria, it is very difficult to believe that this process can be transparent and consistent. Re: Question 4. (For Transmission Facilities) For the purposes of responding to this question, what constitutes the BES? It would seem that you must exclude the elements you are seeking exceptions for or else the exception request is rendered essentially worthless.
Individual

Chris de Graffenried
Consolidated Edison Co. of NY, Inc.
No
Con Edison's overall concern is the lack of clarity and specificity with respect to what analyses and study results are required under the 3rd bullet on page 1 and under #4 on pages 2 and 4. This lack of clarity and specificity will lead to inconsistent application of the Technical Principles by both Registered Entities and Regional Entities. We recommend the following: the impact and performance analyses required by the 3rd bullet on page 1 and by #4 on pages 2 and 4 should be stipulated to be all analyses, scenarios, and contingencies required under NERC Standard TPL-002-1 with the "exception element" removed from the base system model. Entities shall report on all key performance measures of BES reliability specified in the TPL-002-1 attributable to the removed "exception element". Note that references to NERC Standard TPL-001-2 should not be made in the Technical Principles document as TPL-001-2 has not yet been filed with (nor approved by) FERC. General Instructions One-Line Breaker Diagram questions and comments: Page 1, paragraph 2: Please explain the phrase "at the interface points." Where is this location? Please provide several examples, i.e., for a radial, a local network, a generator, a transformer, a substation buss, and for other Elements (PARs, reactors, UFLS panels, relays and switches).
No
Application Form Page 2 For Transmission Facilities: Impacts: Flowgates: The Application form at 2 states, "How does the facility impact permanent Flowgates in the Eastern Interconnection …" • What standards for "impact" does the BES SDT envision? • What is a material impact and a non-material impact? • What kinds and types of impacts are acceptable and/or unacceptable? • How are impacts determined, e.g., Power TFD method, short circuit analysis, A-10 method? Impact-Based Studies: Note that the FERC Seven Factor test is a time-tested method and FERC has identified it as an acceptable method for reliability purposes; for gauging the expected impact of an Element on the interconnected transmission grid. The NPCC A-10 method has been used extensively in the Northeastern U.S. and Canada, and is an impact-based approach. The power TDF (transfer distribution factor) method is also used by some to assess the impact of changing power flows on individual Elements within a system. FERC has studied using the 'TIER' method for classifying system Elements based on LBMP impacts. WECC uses a short circuit test. Page 3 Cranking Path Issue: The Application form at 6 asks, "Is the facility part of a Cranking Path associated with a Blackstart Resource?" We understand that: (i) The drafting team does not require that the BES be contiguous, and (ii) Blackstart resource Cranking Paths were deleted from Inclusion I3. Recommendation: Delete the reference to "Cranking Paths" in this Application form. Power Flow Issue: The Application form at 7 asks, "Does power flow through this facility into the BES?" We assume that this can only apply to a Local Network with two or more connections to the BES. We believe that no power should normally flow through a Local Network (or Radial system) to another portion of the BES. Occasional, brief reverse power flows may be acceptable during short periods under abnormal operating conditions, e.g., a switch normally open is briefly closed during a forced maintenance outage. The Application form at 7 requests the following: "data for the most recent consecutive two calendar year period." • Please explain why the BES SDT felt that two years worth of data was necessary, as one year of data would appear sufficient? Our experience has been that one year (8,760 hours) of data covers four seasons, including Summer and Winter capability periods, and is therefore sufficient. Requiring an extra year is perhaps unnecessarily burdensome on filing Entities, whether asset owners or Regional Entities. The Application form at 7 asks, "[W]hat is the minimum and maximum magnitude of the power flow outflow of the facility …" • Please explain why the BES SDT used the term "magnitude" when requesting power outflow data? Recommendations: 1) We strongly recommend that the BES SDT adopt the FERC Seven Factor test for these purposes. The FERC Seven Factor test states that, • "Power flows into local distribution systems, and rarely, if ever flows out," and • "When power enters a local distribution system, it is not reconsigned or transported on to some other market." 2) We recommend deleting the "% of the calendar year" check boxes in favor of a statement either that power does not flow through the Local Network, or alternatively, a blank space for reporting the net peak MWs and MWH's transferred annually, and the percentage of these transferred amounts to the peak and annual MWH demands served by with the Local Network. 3) We recommend requesting only one year (8,760 hours) of data covering four seasons, including Summer and Winter capability periods.
No

For Generation Facilities: This Application form would appear to generally apply to traditional generating facilities. • What Application form and justifications would be required for non-traditional resources, e.g., solar and wind? • The Application form at 2 asks, “Is the generator or generator facility used to provide Ancillary Services?”If some of these Generator check list items are market-related and not reliability-related, then they should not be present. • If the Ancillary Services are reliability-related, please explain their relation to BES reliability. Recommendation: Insert the word “reliability” before the words “must run” in question 3. The Application form at 5 asks, “Does the generator use the BES to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load?” We assume this mean the generator may serve local loads through non-BES facilities. In order to serve these local loads the generator would need to be connected to a Radial system, a Local Network or to local distribution facilities. • Is this meaning above implied and intended by this question? • Were there any other possibilities envisioned by the BES SDT?
Yes
According to the Applicability section, the TPL Reliability Standards are only applicable to the Planning Coordinator (PC) and the Transmission Planner (TP). Was it the BES SDT’s assumption that Applicants would have the PC or TP run studies for them, or that all Applicants would somehow gain access to those models and run the models themselves? (Ref. TPL-002-1, Applicability: Planning Coordinator, and Transmission Planner.)
Yes
We strongly recommend that the BES SDT adopt the FERC Seven Factor test for local distribution.
Individual
Thad Ness
American Electric Power
Yes
Though we have no objections to the proposed content, this is contingent on the number and type of elements eventually found included or excluded as a result of the BES definition itself which is still being drafted. Any changes in that definition could in turn cause us concern regarding these general instructions. There needs to some provision for cases where specific elements which are not specifically contained within the studies. It needs to be clear what additional analysis needs to be provided under those circumstances. We recommend that the owner of the asset be identified as part of the general instructions. In the case of wind resources, how is individual gross nameplate information to be reported?
Yes
We recommend capitalizing “facility”.
No
It is unclear how the process will work with the interaction among the various NERC Functions. For instance, an exception request from generation might require collaboration among other functional entities, i.e. GOP, TOP, and RC. The question “How does an outage of the generator impact the over-all reliability of the BES” may be subjective and dependent on contingencies at any given time. It would be dependent on what state the BES would be in the area the generator is located. More detail would be needed in describing the study required to have consistent results.
No
As stated in the response to question #3, the question “How does an outage of the generator impact the over-all reliability of the BES” may be subjective and dependent on contingencies at any given time. It would be dependent on what state the BES would be in the area the generator is located. More detail would be needed in describing the study required to have consistent results.
No
As stated in the response to question #3, it is unclear how the process will work with the interaction among the various NERC Functions. For instance, an exception request from generation might require collaboration among other functional entities, i.e. GOP, TOP, and RC. The existence of a must run unit means that unit has a material impact on any configuration of the BES and as such would need a serious waiver to not be considered a BES facility. As such, a must run unit would not receive an

exception. As a result, should question #3 be removed? Criteria for applying for an exception should be outlined before filling out the form.
No
AEP is not aware of any conflicts between the proposed approach and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement, or jurisdictional issue.
No
AEP agrees with the overall approach demonstrated by the exception request form; however, its appropriateness will be largely dependent on the process eventually used for its implementation. AEP would like guidance on how moth-balled generation should be treated. Perhaps this could be added to the exception form as well.
Individual
Anthony Jablonski
ReliabilityFirst
No
These instructions are at a very high level and provide no clear guidance on what is required. ReliabilityFirst Staff believes each bulleted item needs to provide clear expectations. As an example in bullet #2 “Clearly document all assumptions used”, the document and this bullet should include guidance such as what base case transfers were included, a list of facilities that were assumed out of service, new facilities places in service and system load levels, etc.
No
All generating units, to some degree, affect the transmission elements that make-up the BES. What role will this effect have on the determination? If the systems are planned properly and the day-ahead analysis is done for maintenance work, the outage of any one element is moot. What is the phrase “impact the over-all reliability” getting at? These studies and analysis will need to look at multiple outages and groups of elements being taken out and excluded. Will this be on a first come, first out process? As for the Nuclear Plant Interface Requirement (NPIR) question, ReliabilityFirst Staff believes these facilities should always be included as part of the BES and taken out of the Detailed Information to Support an Exception Request. For question 6 ReliabilityFirst Staff believes the Cranking Path should be included in the BES definition. . ReliabilityFirst Staff feels that without including the Cranking Paths, the reliability of the system could be jeopardized if a restoration is required and the Cranking Paths are unavailable due to non-adherence to Reliability Standards. Omit question 7, E3 (LN) of the definition already talks to power flow and even if there is a small percentage of flow, it makes that entity a user of the BES, which should be included.
No
If the systems are planned properly and the day-ahead analysis is done for maintenance work, the outage of any one unit and even with the most serve outage happening, the system should be capable of withstanding. These studies and analysis will need to look at multiple outages and groups of units being taken out and excluded before any could be exempt. What is the phrase “impact the over-all reliability” getting at? These studies and analysis will need to look at multiple outages and groups of elements being taken out and excluded. Will this be on a first come, first out process? As for the Ancillary Services question, ReliabilityFirst Staff believes that if a unit provides this service, it should be included in the BES. The same applies for the “must run units” in question 3. Omit question 5, E3 (LN) of the definition already talks to power flow and even if there is a small percentage of unit’s output flowing onto the BES, it makes that entity a user of the BES, which should be included.
Yes
In some cases, models and even knowledge of the system configurations, operating protocols and procedures may not be well known by all the entities. System adjustments, load levels, topologies, maintenance and outage schedules, which happen daily, will or may be unknown to many entities, including the Regional Entities who may submit a request to include facilities. For cross regional boundaries, the problem becomes even larger. That coupled with generation unit owners/operators not permitted to know transmission information (i.e. Questions 4 and 5); this will put them at a huge disadvantage to participate in the exception request process.
No

Yes
Since the inception of the Open Access Transmission Tariff, transmission models and even knowledge of the systems, operating protocols and procedures may not be well known or known at all by all the entities. System adjustments, load levels, topologies, maintenance and outage schedules (i.e. market sensitive information), which happens daily is not permitted to be known by the generation side of the industry. An unknown at this point and without a common set of criteria to be used by the Regional Entities and NERC Staff and Panels, it will be difficult to make consistent determinations across the ERO Enterprise.
Yes
FERC Order 743-A, paragraph 1, discusses that NERC should "…establish an exemption process and criteria for excluding facilities that are not necessary for operating the interconnected transmission network". It also directed in paragraph 4 that "Order No. 743 also directed the ERO to develop an exemption process that includes clear, objective, transparent and uniformly applicable criteria for exempting facilities that are not necessary for operating the interconnected transmission grid." The SDT proposed a set of questions titled "Detailed Information to Support an Exception Request" to assist in the exemption process but in our mind is not "exception criteria" as stated in the FERC Orders. ReliabilityFirst Staff believes that NERC should develop criteria for which facilities or Elements could be exempted from the core definition; an example being Local Networks as outlined in the current draft of the definition. ReliabilityFirst Staff believes the Local Network exclusion is not "bright line" and could be removed from the core definition and used as criteria for exclusion in the exemption process. Item b of the LN (E3) exclusion would need evidence to support the historical and future power flows. Historical data and future power flow study results would be needed to support this exception. Additionally, another example for exemption criterion for inclusion to the BES could be any 69 kV network facilities that provide a parallel path to the BES. Evidence such as one-line diagrams along with power flow studies would need to be provided through the exemption process for these types of facilities to be included in the BES. ReliabilityFirst Staff believes that any BES facilities should not be candidates for exemption based upon the arbitrary determination of a panel that considers the aspects stated in the document "Detailed Information to Support an Exception Request". Without uniform criteria as stated in the FERC Orders, it will be difficult for the panels to make consistent determinations across the ERO Enterprise.
Individual
Joe Petaski
Manitoba Hydro
No
No
No
Yes
Canadian Entities are not under FERC jurisdiction, so the revised BES Definition may not apply. A number of Canadian Entities have the BES defined within their provincial legislation. This may introduce differences and even contradictions between elements that are included in the BES according to provincial legislation and the NERC definition.
Yes
Manitoba Hydro strongly disagrees with the proposed 'Detailed Information to Support an Exception Request' document and associated exception process for the following reasons: -It is not clear what elements or situations beyond what is covered in the core definition and associated inclusions and exclusions that the drafting team is hoping to capture through the exception process. Further, it is unclear what the benefit to reliability would be by allowing an impact based exception process given that entities will be extremely unlikely to use the exception process to include elements in the BES. -The exception process will be extremely resource intensive, particularly in the absence of any

Industry approved threshold criteria. The costs to properly administer and monitor the process to ensure that impact based modeling is done accurately and that it captures the frequent changes on a dynamic system will occupy a wealth of Industry, NERC and Regional Entity time to the detriment of reliability. -It is not reasonable for industry to approve the exception process without knowing what thresholds are required to demonstrate an element as being part of the BES or not. We are concerned that BES determinations would be subjective and would vary from case to case with the particular staff examining the request. BES elements should be established and agreed upon by Industry, not set by a NERC panel. We understand that the drafting team has made this change in the interests of time, but the impact of the BES definition is too broad for this project to be rushed. -The 2010-17 project goals to increase the clarity of the BES definition and establish a 'bright-line' are compromised by the exception process. Changes and alterations to the BES definition should be approved by Industry through the Standards Under Development Process. An interpretation request or SAR should be developed by an entity if they feel that the core definition and associated exceptions and inclusions should be modified. We ask that NERC requests that FERC re-examines the directive to develop an exception process given that the BES definition, which already includes a list of exceptions, is sufficient to standalone without an associated exception process.
Group
Janet Smith
Arizona Public Service Company
Yes
In accordance with WECC's position paper issued on October 5, 2011, AZPS agrees with WECC in that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests.
Individual
Robert Ganley
Long Island Power Authority
Yes
Yes
On page 3 why reference if a facility is part of a Cranking Path after the SDT has deleted Cranking Paths from the Inclusion list as part of the BES definition.
Yes
Need to define the term "must run unit"
No
No
Not aware of any
No
Individual
Eric Salsbury
Consumers Energy
Yes

No
We believe that item 6, should read "Is the facility part of a Primary Cranking Path associated with a Blackstart Resource?" Currently, the word "Primary" is not included.
Yes
Yes
No
No
No
Group
Jonathan Hayes
Southwest Power Pool
Yes
Yes
Yes
Yes
SCADA line flow data might be hard to capture for the last two years. Specifically the line flows may not be available.
No
No
No
Individual
David Burke
Orange and Rockland Utilities, Inc.
No
In the first paragraph “Entities that have Element(s) designated as excluded, under the BES definition and designations, do not have to seek exception for those Elements under the Exception Procedure.”, before the “General Instruction” it should have had another sentence saying that “for those who do not clearly meet the Inclusions and Exclusions should use the following instructions”. Otherwise, it’s still not very clear.
No
Please clarify “facility” and include “N-1” for power-flow studying.
No
However, please clarify “facility” and include “N-1” for power-flow studying.
No
No

No
Group
Steve Rueckert
WECC
No
WECC has several concerns with the instructions on the checklist regarding the studies: • Study Case – The instructions state the study case that should be used, “Be based on an Interconnection-wide base case that is suitably complete and detailed to reflect the facility’s electrical characteristics and system topology.” The phrase “suitably complete and detailed” is vague. WECC recommends clarification of this phrase and the addition of specific requirements for what will constitute an appropriate case. Allowing the entity requesting an exception to choose any Interconnection-wide case could allow an inappropriate choice of case and could lead to inconsistent study results. If there are no requirements for the chosen case, then it is possible that the most favorable case to an entity’s argument will be chosen. In some instances that choice would likely be appropriate, but in others it would not necessarily be appropriate. At a minimum, there should be further description — and preferably, specific requirements — guiding the determination of which study case is most appropriate. Of particular importance in clarifying what case is an appropriate case, is the timeliness of the case. WECC recommends requiring that a recent case be used. In addition, if each entity is able to chose its own case, without further requirements, there will be no way for the Regional Entity or NERC to ensure consistency of determinations with respect to the elements tested. • The entities are asked to address key performance measures of BES reliability through the studies. This instruction is vague concerning what the study must investigate and it leaves it up to the entity to determine the key performance measures. The “key performance” measures should be consistent with respect to similar elements and there is no way to ensure that if there are no specifications regarding such measures. The exceptions process must be objective and clear as to what performance measures need to be met for the process to be implemented consistently. WECC recommends further clarification and the addition of specific requirements beyond the guidance related to consistency with Transmission Planning (TPL) standards. • The background information on the comment form states: “The same checklist will be utilized for exceptions dealing with inclusions or exclusions.” But there is no mention of this in the document. A note should be added to the checklist instruction to state that the same checklist will be used for exclusions and inclusions.
Yes
The requested information in the checklist is appropriate. However; the exceptions process as drafted, with no objective criteria defining how to assess the submittals, leaves it to each Regional Entity to develop their own criteria to evaluate the responses to the checklist included in the submittals, leading to inconsistency between Regional Entities. In addition, WECC recommends clarifying Question 7. On its face it is unclear what defines power flowing through a facility in the BES. It should be clear whether a qualitative or quantitative response is required.
Yes
The requested information in the checklist is appropriate. However; the exceptions process as drafted, with no objective criteria defining how to assess the submittals, leaves it to each region to develop their own criteria to evaluate the responses to the checklist included in the submittals, leading to inconsistency between Regional Entities.
Yes
Entities would have a difficult time deciding what data to obtain. Getting the data for their own specific facilities should be relatively simple for the majority of entities. However, it is possible smaller entities may have a higher burden putting together the appropriate information for inclusion in a study case that they currently may not do. In addition, because the instructions state that a case will be “suitably complete and detailed,” WECC believes there is insufficient guidance as to what amount and degree of detail in the data is sufficient for the submittal process. Without thresholds it is difficult to determine whether the entities will have the ability to obtain necessary data to file for an exception. At this time, WECC views the instructions as insufficient for these reasons.
Yes

In order to make a determination of BES status of an element, there should be a listing of effects of the outage on certain facilities, frequencies, voltages, transmission elements, or other information that should be included in the submittal by the entity. Without further specification of requirements for presenting a case it is likely that the Regional Entity will receive inconsistent submittals of data. Leaving open the question of what constitutes a sufficient presentation of a case would likely lead to a wide spectrum of submittals with respect to the amount of data and level of detail in the data.
No
Yes
WECC is very concerned that there are no specific qualifications or requirements, either for the entities or for the Regional Entity, with respect to: • the determination of which studies need to be conducted; • the format of the study data that should be submitted; or • the key performance measures that should be evaluated. This vagueness will lead to inconsistency in studies run, data submitted, and measures of data evaluation. If this inconsistency occurs, it will result in a potentially subjective and discordant process on multiple levels for both the submitting entities and the Regional Entities. It may result in submitting entity having to run multiple studies in order to determine what will be acceptable proof, which is overly burdensome on both the submitting entity requesting the exception and the Regional Entity reviewing the request. It also makes the consistency that FERC has requested difficult to assess and achieve. If the goal of the exceptions process is to result in consistent determinations across the regions, then WECC recommends that to the extent possible, the process be objective, clear, and include detailed instructions. The development of such an objective and detailed process is a difficult task and will require additional time. WECC believes it is better to not have an exceptions process in the interim period than to have an inefficient and overly burdensome process in place. To allow adequate time to complete the task of developing a detailed and consistent process WECC recommends that the Detailed Information to Support BES Exceptions Request be included in Phase II of the BES definition project.
Individual
Kathleen Goodman
ISO New England Inc
No
It is unclear what the purpose of submitting diagrams showing the Protection Systems is and we do not feel that it should be a requirement at the onset of the exception process. In the first bullet, we do not feel that the term “Interconnection-wide base case” is required as the phrase “suitably complete and detailed” should provide enough guidance to the submitter that inappropriate equivalent representations would not be accepted. The concern is that one could interpret “Interconnection-wide base case” as the entire Eastern Interconnection model is a requirement.
No
- Question 1 o The use of the words “connected to” is unclear. Some may read this as generation “directly” connected to while others could interpret it more generically. o A generation cut-off should be included in the requirement to list all individual units that may be connected to a facility. A suggestion would be to use a 1 MVA cut-off so that machines such as wind turbines would still be captured but smaller installations would not need to be listed in detail. o When listing individual gross nameplate values, the form should be specific that it is requesting the nameplate MVA value. - Question 3 o It is not clear how a facility could be included in an Interconnection Reliability Operating Limit (IROL) is a limit and not a specific element. Rather, it is clearer to ask if a facility is used to identify an IROL either as a part of the interface itself or as a contingency which relevant to the IROL. - Question 4 o As this question only pertains to the outage of the facility, there may also be a need to show how the outage of another element could impact the facility seeking exception. A new question to add to address this would be “How does an outage of other BES facilities impact flows through this facility and thus, the over-all reliability of the BES?” - Question 6 o This question appears to be inconsistent with the removal of the “Cranking Path” from the BES definition. o If the question is to remain, the question should be clarified to state, “With a Blackstart Resource “material to” and designated as part of a transmission operator entity’s restoration plan. - Question 7 o The question should be more specific to whether the flow should be measured under all-lines in conditions or post-contingency. o The question should be more specific as to whether the power flow pertains to Real, Reactive. or Apparent Power. o The use of the word “through” in the question is unclear. This is more

evident when trying to apply this question to facilities which are transmission lines that are not directly connected to the BES.
No
- Question 1 o The question would be better worded as “How many MW are lost following the host Balancing Authority’s most severe single Contingency…”. o The question becomes difficult to answer when the most severe single Contingency can change on a day-to-day and hour-to-hour basis. o The MVA size of the facility should be requested. - Question 3 o The term “must run unit” is unclear.
No
All concerns were captured in comments provided to the previous questions.
No
All concerns were captured in comments provided to the previous questions.
No
Yes
Given all of these decisional inputs requested by the Exception Application there needs to be some guidance or clarification here regarding the criteria that will be used to render a yes or no decision other than simply filling out the Application and allowing the Rules of Procedure process to take place. The Application process for Exceptions (inclusions or exclusions) appears to be subjective and lacks the decisional technical criteria for the applicant to be confident of the outcome.
Individual
Diane Barney
New York State Dept. of Public Service
No
Missing from the document are any indicators as to how much information is sufficient, how the information will be evaluated, what weight will be given to the individual pieces of information, etc.
No
Question 6 should be dropped. Facilities in a cranking path for a blackstart resource should not be a consideration. Question 7 is circular. If a facility is used to flow power into the BES, by definition it is outside the BES. Needs clarification as to the information the question is seeking.
Individual
John Seelke
PSEg Services Corp
No
What is meant by “key performance measures of BES reliability” in the third bullet? A descriptive list would be helpful.
No
Questions #4 requires an analysis of the “most severe impact” associated an outage of the Element proposed for exception. a. Both the newly Board approved TPL-001-2 standard and the existing TPL-004-1 require that severe contingencies be evaluated, but there are no performance requirements for them. If the team intended the “most-severe impact” analysis to only evaluate TPL outages that incorporate performance requirements, it should make that clear. b. The most-severe-outage impact question does not ask key relevant information such as: i. What is the probability that the “most severe impact “will occur? ii. Could the impact be readily mitigated and service restored? This point is critical because the impact of an outage lasting several minutes before restoration versus several hours before restoration should affect the analysis. What does question #7 (“Does power flow through this facility into the BES?”) with check boxes for various % of a calendar year that power flows into the BES) imply with respect to a transmission facility’s exception request? Also, is the % of a calendar

year data intended to be forecasted data or historic data? It would seem that forecasted data would need to be supplied that is consistent with the TPL models. Finally, why are historic flows requested – they have no relevance except for perhaps explaining historic and forecasted differences?
No
With regards to question #2 (“Is the generator or generating facility used to provide Ancillary Services”), the answer for most synchronous generators is probably “yes” unless they are in a bid-based market that selects specific generators for Reactive Power delivery. Since most generators (with the exception of those with nuclear prime movers) provide Reactive Power to meet a Transmission Operator-specified voltage, they would provide that Ancillary Service. Other generators (again, with the exception of generators with nuclear prime movers) may be eligible to provide other Ancillary Services such as Spinning Reserve, but may have rarely done so. However, they still may be “used do provide” Spinning Reserve at any time. How would those generators respond to question #2? Questions #4 requires an analysis of the “most severe impact” associated an outage of the Element proposed for exception. a. Both the newly Board approved TPL-001-2 standard and the existing TPL-004-1 require that severe contingencies be evaluated, but there are no performance requirements for them. For consistency, performance requirements for the most-severe-impact analysis needed to be defined by the team. If the team intended the “most-severe impact” analysis to only evaluate TPL outages that incorporate performance requirements, it should make that clear. b. The most-severe-outage impact question does not ask key relevant information such as: i. What is the probability that the “most severe impact “will occur? ii. Could the impact be readily mitigated and service restored? This point is critical because the impact of an outage lasting several minutes before restoration versus several hours before restoration should affect the analysis. What does the answer to the question #5 in the Generator Facilities section (“Does the generator use the BES to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load?”) imply with respect to a generator’s exclusion? Also, the phrase “deliver its actual or scheduled output …to load” needs explanation. The use of “actual output” and “scheduled output” may have several contexts. a. For example, in a market, a generator’s actual output may suddenly go to zero due a forced outage, but the generator has financial obligations that accrue for delivering its scheduled output, which is in fact provided by other sources since the generator is unavailable. Is the question asking about the use of BPS facilities by resources that may be substituted for delivery of a generator’s scheduled output when it differs from its actual output? b. Now assume that a generator’s actual output equals its scheduled output and that several generators are forced out of service in another Balancing Authority, resulting in a frequency decline. Generators within the interconnection with active governors and available spinning capacity will automatically increase their output above their scheduled output, resulting in Inadvertent Interchange. Is the question related to the BES facilities used to deliver such Inadvertent Interchange? c. Again assume that a generator’s actual output equals its scheduled output. Is the question related to the actual BES facilities that may be used to deliver the generator’s power to Load? That would require an analysis of generator and load shift factors to determine what actual facilities carry the power generated from a generator to a specific load for a given set of assumptions on the system topology. In a market, this analysis would not be possible for generators that do not self-schedule for delivery to specific loads.
Yes
It would depend upon the clarifications to the points raised above.
No
No
Yes
An applicant should be able to clearly tell whether or not an exception request will likely be granted before it is submitted. It is nearly impossible to divine the whether a request will be granted from a set of data questions. The team is urged to state the exclusion criteria explicitly; data questions required to evaluate a request should directly reference each criterion. See Order 743, paragraph 115: “NERC should develop an exemption process that includes clear, objective, transparent, and uniformly applicable criteria for exemption of facilities that are not necessary for operating the grid.”
Individual
Sylvain Clermont

Hydro-Quebec TransEnergie
No
We believe that the new Technical Principles are better than the previous ones, as they allow flexibility for an Entity to make their case with technical justifications. However, without any guide or specific criteria, it does not allow an Entity to identify the real possibility to obtain an exception. It is not clear at all what will guide the Region or ERO to make their decision to grant or not the exception. In order give confidence to the Industry in the procedure, it would be necessary to define the elements that will guide the decision. Will impact base study be accepted? Will the threshold differences with Quebec Interconnection be accepted?
No
No
No
Yes
The general characteristics of the Interconnection (such as frequency or voltage variation), as they may guide the decision for exclusion of specific elements.
Yes
For HQT's system, the proposed BES definition combined with the exception procedure are presently incompatible or at least inconsistent with the regulatory framework applicable in Quebec. The proposed changes have not address this concern, neither the SDT's responses to our previous comments last May (Q.9). We reiterate that the definition and the exception procedure shall be determined by Quebec's regulator, the Régie de l'Énergie du Québec, (Quebec Energy Board) which has the responsibility to ensure that electric power transmission in Quebec is carried out according to the reliability standards it adopts. Per se, it would be necessary that E1 and E3 grant exclusions with much higher level of generation. It would also be necessary to allow for several levels of application for the Reliability Standards, in accordance with the Régie de l'énergie du Québec approach: the Bulk Power System (BPS) as determined using an impact-based methodology, the Main Transmission System (MTS), and other parts of Regional System. Standards related to the protection system (PRC-004-1 and PRC-005-1) and those related to the design of the transmission system (TPL 001-0 to TPL-004-0) shall be applicable to the first level, but all other reliability standards shall be applied to the second level, the MTS. The MTS definition is somewhat different than the Bulk Electric System definition, and it includes elements that impact the reliability of the grid, supply-demand balance and interchanges. We argue that it would be necessary for NERC to address the regulatory issues outside ot the present context of the SDT and ROP team.
Individual
Rick Hansen
City of St. George
No
While the general instruction information outlined is applicable, it lacks sufficient detail to know exactly what is needed to be submitted. More importantly the general instructions and the overall document lacks criteria that if met (through study and other documentation methods) would allow for exclusion from or inclusion to the BES. Something similar to the criteria or concepts used in the Appendix 1 of the Local Network Exclusion justification document is needed. Clear criteria should allow an entity to determine with a reasonable degree of certainty that if the criteria are met as demonstrated by the associated study effort that an exemption can be obtained. Otherwise without that criteria, the process will be not far from where the exemption process is today, which will be costly, time consuming and frustrating for the registered entities as well as the regions and NERC. The process needs to be repeatable and consistent between all regions and entities. Entities need to know what is expected and where the finish line is. As presently written each region and NERC would have to develop their own criteria individually and will be open to opinions which could change as personnel changes occur in a given position or panel.

No
The questions for transmission facilities seem to be appropriate; however, how the answers are to be used by the region or NERC is unclear. Will a given response to a question make exclusion impossible? If so this needs to be known upfront and clearly documented. For example question 4, on page 2 is open for interpretation and debate as to what the impact to the over-all reliability of the BES is. The definition of “impact” is really the key to the whole definition effort. Load flow, voltage, frequency change limits may all be pieces to the puzzle. Are these criteria to be met in normal, N-1, N-2, etc. system configurations?
No
The questions for generation facilities seem to be appropriate; however, how the answers are to be used by the region or NERC is unclear. Will a given response to a question make exclusion impossible? If so this needs to be known upfront and clearly documented. For example question 4, on page 4 is open for interpretation and debate as to what the impact to the over-all reliability of the BES is. The definition of “impact” is really the key to the whole definition effort. Load flow, voltage, frequency change limits may all be pieces to the puzzle. Are these criteria to be met in normal, N-1, N-2, etc. system configurations?
Yes
The access to the required data would be potentially be a concern especially for smaller entities. Small entities will typically have to outsource the required studies to consultants and obtaining the data may be difficult for the consultants. The entities most likely to obtain exemptions (smaller & lower impact entities) are the ones that probably will have the most difficulty in obtaining the data. Generally larger utilities “upstream” from the smaller ones are hesitant to give information to other entities. Depending on the study requirements and criteria for application, this could be a very costly process.
No
No
Yes
Clear, concise criteria with consistent repeatable results are a must for a successful outcome of the project effort. The included questions are appropriate questions but the use of those questions and the ultimate outcome is unclear with the current version. The background information indicates that continent wide criteria are not feasible. It is understood that this is a very difficult task and will be difficult to achieve (especially in the time allotted). However, if the decisions are left up to a “panel” to decide the results will be inconsistent and will vary region by region, as well as differ over time. The process involved will be very time consuming (i.e. expensive) and will be difficult to control especially during the initial timeframe. History has demonstrated that review and approval processes that pass from the entity to the regions, then to NERC and then on to FERC backup very easily due to limited staff and resources. The drafting team may want to consider moving this topic to Phase 2 of the project. However, Phase 2 needs to have fairly quick time frame in order to provide the needed direction to the industry in a timely manner.
Individual
Bud Tracy
Blachly-Lane Electric Cooperative
Yes
The Blachly-Lane Electric Cooperative (BLEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required

details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

BLEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

Yes

BLEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.

Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine

whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.

Yes

As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.

No

No

As a general matter, BLEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.

Individual

Dave Markham

Central Electric Cooperative (CEC)

Yes

The Central Electric Cooperative (CEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

CEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the

information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
Yes
CEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.
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Yes
As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No
No
As a general matter, CEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES

Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Dave Hagen
Clearwater Power Company (CPC)
Yes
The Clearwater Power Company (CPC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
CPC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
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CPC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the

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Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency (“MSSC”) to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.

Yes

As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.

No

No

As a general matter, CPC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.

Individual

Roman Gillen

Consumer's Power Inc. (CPI)

Yes

The Consumers Power (CPI) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of

relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

CPI agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

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CPI agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.

Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single

contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.

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No

No

As a general matter, CPI believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.

Individual

Dave Sabala

Douglas Electric Cooperative (DEC)

Yes

The Douglas Electric Cooperative (DEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

DEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there

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Yes
DEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.
Yes
The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
Yes
As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No
No
As a general matter, DEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve

its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Bryan Case
Fall River Electric Cooperative (FALL)
Yes
The Fall River Rural Electric Cooperative (FALL) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
FALL agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
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As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No
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As a general matter, FALL believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Rick Crinklaw
Lane Electric Cooperative (LEC)
Yes
The Lane Electric Cooperative (LEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface

points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

LEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

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the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
Yes
As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No
No
As a general matter, LEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
No
We anticipate that entities will be granted access to the required historical operations records and modeling data after signing of non-disclosure agreements with the providers of the information.
No
No
Yes
We believe that the SDT proposed approach for exception criteria is reasonable recognizing that one method/criteria cannot be applicable to everyone and every situation within the ERO foot print. However, we believe that there is huge gap and lack of any transparency on how the exception application will be evaluated and processed. We strongly suggest that SDT develop a reference or a guidance document as part of the RoP that should provide some guidance to Registered Entities, Regional Entities and the ERO on how an exception application should be processed. The absence of

such guidance will pose a challenge for each entity including the ERO, and may result in discrepancies amongst Regional Entities. The process may be perceived by registered entities as being non-transparency.
Individual
Michael Henry
Lincoln Electric Cooperative (Lincoln)
Yes
The Lincoln Electric Cooperative (Lincoln) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested” may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
LINCOLN agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to “Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator’s restoration plan.” This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator’s restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general “catch-all” question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
Yes
LINCOLN agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding “necessary for the operation of the interconnected bulk transmission system” to the end of the question, so that it reads: “Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?” The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding “radial, or Local Network” to the question, so that it would read: “Does the generator use the BES, a radial system, or

a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.
Yes
The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
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As a general matter, LINCOLN believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Jon Shelby
Northern Lights Inc. (NLI)
Yes
The Northern Lights (NLI) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection

systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

NLI agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

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NLI agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.

Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine

whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.

Yes

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No

No

As a general matter, NLI believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.

Individual

Ray Ellis

Okanogan County Electric Cooperative (OCEC)

Yes

The Okanogan County Electric Cooperative (OCEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

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Yes
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No
No
As a general matter, OCEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based

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Individual

Rick Paschall

Pacific Northwest Generating Cooperative (PNGC)

Yes

The Pacific Northwest Generating Cooperative (PNGC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

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Yes

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Yes

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No

No

As a general matter, PNGC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.

Individual

Heber Carpenter

Raft River Rural Electric Cooperative (RAFT)

Yes

The Raft River Rural Electric Cooperative (RAFT) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement “diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being

requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

RAFT agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

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No
No
As a general matter, RAFT believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Steve Eldrige
Umatilla Electric Cooperative
Yes
The Umatilla Electric Cooperative (UEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
UEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have

Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
Yes
UEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.
Yes
The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
Yes
As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No

No
As a general matter, UEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Marc Farmer
West Oregon Electric Cooperative (WOEC)
Yes
The West Oregon Electric Cooperative (WOEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
WOEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
Yes
WOEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1)

Question 2 should be modified by adding “necessary for the operation of the interconnected bulk transmission system” to the end of the question, so that it reads: “Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?” The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding “radial, or Local Network” to the question, so that it would read: “Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general “catch-all” question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.
Yes
The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency (“MSSC”) to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
Yes
As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No
No
As a general matter, WOEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Individual
Steve Alexanderson
Central Lincoln

Yes
Yes
We note that if Q7 is yes, an entity is asked to provide meter or SCADA data. Evidently the team assumes the facility in question is existing. We propose that study data could be provided instead for facilities that are in the planning stage.
Yes
No
No
No
No
Group
David Kiguel
Hydro One Networks Inc.
No
On the posted document, we did not find how an exception application will be assessed by the RE and NERC. We believe that there is a huge gap and a lack of transparency for all stakeholders on how the exception application will be evaluated and processed. We strongly suggest that the SDT develop a reference or a guidance document as part of the RoP that will provide guidance to Registered Entities, Regional Entities and the ERO on how an exception application would/should be processed.
Yes
We believe that the SDT's proposed approach for exception criteria is reasonable; recognizing that one method/criteria can not be applicable to everyone and every situation within the ERO foot print. See our comment in Q1.
Yes
See comments in Q1.
No
Yes
The general approach, information, data, and assessments proposed seem to be reasonable. However, guidance is not provided as to how this information may be evaluated in the decision making process. As such, a reference document should be developed and provide guidance how applications will be assessed. For example" 1) Does the element(s)? • Would have qualified under one of the exclusions or inclusions but have marginally different threshold as prescribed in the definition; • transfer bulk power within (intra) or between (inter) two Balancing Authority Areas; • monitor facilities included in an Interconnection Reliability Operating Limit (IROL); • are not considered necessary for the operation of interconnected transmission system under normal conditions, contingency or prolonged outage conditions. 2) Are System Element(s) located in close electrical proximity to Load? • Electrical proximity may be a measurement of system impedance between load centers within the system seeking exception. • Other physical characteristics. 3) Are System Elements treated as primarily radial in character? • Smaller deviation from the exclusion E1. • This can be demonstrated by the way the connections to the BES are operated (e.g., the local area is not operated as part of the BES with disconnection procedures when events occur in the local area to separate it.) • This can also be demonstrated by the way resources in the local area are treated in operations, for example, they are not included in a regional dispatch or secured by an ISO/RTO. • Power flows into the system, but rarely flows out. i. This can be demonstrated through transactional records or load flow analysis where it is shown that flow out does not occur or occurs only under a very limited set of conditions and for a limited quantity of energy. a. The limited set of conditions

must clearly state the conditions where power flows out, for example, only under specified contingency events. b. Transactional records provided must be for the same time specified in the Exception Rules of Procedure for performing periodic exception self-certifications (presently two years). c. Power entering the system is not recognized or regularly transported on to some other system. (This can be demonstrated by operational procedures that restrict use of delivered power to that system, e.g., the absence of a wheeling agreement or an agreement that generally restricts wheeling under normal) d. The System Element(s) have a very small Distribution Factor on any other BES Element(s). • System Elements are not necessary for the operation of interconnected transmission under normal, contingency or prolonged outage conditions.
No
We believe, and support that RoP exception procedures are adequately dealing with this issue.
Yes
As mentioned above, we strongly suggest and encourage that SDT to develop a reference or a guidance document that will provide guidance to Registered Entities, Regional Entities and the ERO on how an exception application should/would be processed.
Group
Chris Higgins
Transmission Reliability Program
Yes
BPA suggests clarifying that the interface point is the point where the entity seeking the exception's facility or facilities interconnect(s) to the Bulk Electric System facility. Page 1 states "Supporting statements for your position from other entities are encouraged." BPA believes coordination with affected systems should be required under the exemption process.
No
Regarding #4 on page 2: BPA believes the impact to the over-all reliability of the BES needs to consider more than just an outage of the facility requesting exclusion. One example is a contingency outage of a parallel facility that could cause an overload. Item 4 needs to include impacts of either the outage of the facility, or with the facility in service. BPA believes that the entity requesting an exception may not have information on impacts of the facility on parallel higher-voltage facilities because the NERC requirements for data sharing for these types of facilities does not necessarily include owners and operators of lower voltage systems. The entity requesting an exemption would likely need to coordinate with affected systems, and this coordination should be required in the exemption process so that affected systems are aware of the possible exclusion.
Yes
Regarding #1 on page 4: BPA Believes seasonality may need to be considered when comparing the generator with the most severe single contingency.
Yes
BPA believes the studies discussed in pages 2-4 would likely need to be completed and the required information supplied by the Transmission Planner/Operator of the Balancing Authority Area since many of the assumptions regarding performance of the BES to delivery under a variety of operating conditions is known only to the TP and TOP of the system.
Yes
No
No
Individual
Saurabh Saksena
National Grid
Yes

No
We agree with the information requested on pages 2 and 3, however we would like more clarification regarding Item 7. When answering what % of the calendar year power flows through the facility into BES, should this be calculated on an hourly basis? We would also like clarification for Item 7 regarding the request for SCADA data from the last 2 years to determine the minimum and maximum magnitude of the power flow out of the facility. What data should be used in situations with new facilities or in situations or where the system configuration (topology) has changed in such a way that the power flows in the area have changed, so the last 2 years of SCADA data is no longer relevant
Not Applicable
No
No
No
Yes
We are assuming that "yes" answers on this checklist are not intended to result in automatic rejection of the application. We think the procedure would benefit from a general statement noting that all answers taken together will be considered to make clear that no single answer will necessarily be dispositive of the outcome.
Group
Louis Slade
EMP & NERC Compliance
No
Given that the second sentence in the 1st paragraph of this comment form reads “This same process would be used by Registered Entities to justify including Elements in the BES that might otherwise be excluded according to the proposed definition and designations.”, Dominion suggests that the 1st sentence under General Instructions be revised to read “A one-line breaker diagram identifying the facility for which the exception (or inclusion) is requested must be supplied with every application. The diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception (or inclusion) is being requested.”
Yes
No
The SDT language specifying services acceptable for inclusion in an exclusion request references ancillary services identified under a Transmission Service Provider’s OATT. However, there is great variation in the services that have actually been implemented and posted across North America under those OATTs. There is no consistent description or terminology to characterize those services. In short, Transmission Providers have been permitted to individualize OATT services to fit regional market structures and vernacular. For example, PJM’s OATT includes a schedule for Blackstart Service. The FERC pro-forma tariff does not. ISO-NE’s tariff includes the following ancillary services (which are performed by the ISO and TSP): • Scheduling, System Control and Dispatch Service • Energy Imbalance Service • Generator Imbalance Service Therefore, Dominion suggests that the SDT provide a specific list of ancillary services that would be eligible for exclusion, rather than rely on OATT references. Examples might include: reactive, voltage control or regulation services, frequency response and blackstart services. Dominion is also aware that the phrase ” ‘must run” is used in some RTO/ISO market systems to indicate intent to self-schedule the generator. Dominion suggests that question 3 be revised to read “Is the generator designated as a “must run” unit by eitherthe Balancing Authority, Resource Planner or Reliability Coordinator?
Yes
It has been Dominion’s experience that CEII or Code/Standards of Conduct rules may restrict generation entities (GO/GOP) from obtaining some of the information necessary to perform the analysis needed to file the “Detailed Information to Support an Exception Request”. Dominion is also aware that, in some cases, generation entities do not have the technical expertise (transmission

planning, power flow and or stability analysis background) to perform such analysis.
No
Yes
Much of the information necessary to perform the analysis required is restricted either by federal and/or state Codes/Standards of Conduct and/or CEII prohibitions.
Yes
The Detailed Information to Support an Exception Request form has 2 sections; one for transmission facilities and another for generation facilities. Yet, the Project 2010-17 Definition of Bulk Electric System document uses other terms such as real and reactive power resources, dispersed power producing resources, static or dynamic devices, blackstart resources, radial systems, local networks (LN), and reactive power devices. Dominion suggests that the Detailed Information to Support an Exception Request form be revised to conform to the Project 2010-17 Definition of Bulk Electric System document through either use of some sort of 'selection' (checkbox, drop down, write in) or revision of transmission facilities and generation facilities to be more inclusive.
Group
Bill Middaugh
Bill Middaugh
This question is actually asking two questions; Tri-State's answers would be No & Yes. There needs to be a better introduction to what and why the exception is being requested.
Again Yes/No is conflicting in the question. The requested information in#2 is too vague and may be subjective. If the information in#7 is requested in the planning stage the data would not be available. What objective criteria would be used to determine the state of the exception request?
Again Yes/No is conflicting in the question. Information requested in #4 is subjective and too vague.
Yes
It may be hard for a GO to get the information requested in #1 or #4.
No
No
Yes
TSGT believes that the proposed "Technical Principles for Demonstrating BES Exceptions Request" does not clearly define the basis for decisions to exclude or include, which will lead to inconsistent application by the Regions. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Individual
Darryl Curtis
Oncor Electric Delivery Company LLC
Yes
Yes

Yes
No
No
No
No
Group
David Thorne
Pepco Holdings Inc
No
1)Why must the one-line diagram supplied show the Protection Systems at the interface points associated with the elements for which the exception is being requested? Since Protection Systems are not part of the new bright-line BES definition why would their presence, or absence, on the one-line diagram influence the exception process? 2)The third bullet needs additional detail of what is being requested. The phrase "…key performance measures.." and use of methodologies described in TPS Standards does not provide sufficient direction needed. (see question #4)
No
1) Why is Item 5 (Question pertaining to whether the facility is used for off-site power to a nuclear plant) included, since this criteria is not part of the proposed bright-line BES definition. 2) Similarly, why is Item 6 (Question pertaining to whether the facility is part of a Cranking Path associated with a Black Start Resource) included, since Black Start Cranking Paths were removed from the latest BES definition. Both Items 5 and 6 should be removed from the Exception Request Form.
Yes
No
Not all TOs have the capability to perform the power flow and stability analysis on their own, necessary to meet the exception request. It may be burdensome for the TO to hire a consultant or to have their affiliated TPL perform the rigorous study/analysis as contained in the TPL standards. Additional details should be provided as to what part of the TPL standards apply. Should the Affiliated TPL be required to perform TOs studies for exception requests? If so should that be stated in a related standard as a requirement?
No
No
No
Individual
Roger Meader
Coos-Curry Electric Coooperative
Yes
The Coos-Curry Electric Cooperative (CCEC) agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. We are concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. We envision that at least four different kinds of documents could be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and,

operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. WE suggest that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

CCEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest two modifications to the proposed language to ensure consistency with the BES Definition and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) We suggest modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (2) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While we believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.

Yes

CCEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. We suggest three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter clearly is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, we suggest modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.

Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the Registered Entity receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single

contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency (“MSSC”) to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
Yes
As discussed in our responses to Questions 1 through 3, we believe that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
No
No
As a general matter, CCEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. We also support the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. We agree that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the Registered Entities.
Group
Cynthia S. Bogorad
Transmission Access Policy Study Group (please see www.tapsgroup.org for a list of TAPS' more than 40 members)
Glossary terms should be capitalized throughout the document. Lowercase “facility,” especially, should not be used. The document should use “Element” instead. The term “interface points,” while common, may not have a sufficiently common understanding to be used in this context. “Boundaries of the Element(s) for which the exception is being requested” may express the SDT’s meaning more clearly.
Question 7 asks, “[d]oes power flow through this facility into the BES?” As in the rest of the document, the reference should be to an “Element(s),” rather than to a “facility.” In addition, we suggest that the meaning of power flowing “through” the Element(s) be clarified, consistent with clarification of the same point in Exclusion E3 of the BES Definition. In TAPS’ comments on the BES Definition, also submitted today, TAPS suggests that the first sentence of Exclusion E3 be revised to state: “Power flows only into the LN, that is, at each individual connection at 100 kV or higher, the pre-contingency flow of power is from outside the LN into the LN for all hours of the previous 2 years.” We propose that Question 7 in the Detailed Information to Support an Exception Requests be similarly revised: “Does power flow from this facility into the BES, i.e., at any individual connection at 100kV or higher, is the pre-contingency flow of power from the LN to the BES for any hour of the previous 2 years?”
Group
John P. Hughes

Electricity Consumers Resource Council (ELCON)
No
The exception request form should begin with a question asking if the inclusion was triggered by the entity responding to an emergency request by the applicable BA, RC or TOP. The entity's response to support recovery from an emergency may have resulted in (1) power flows through the entity's facility into the BES, and/or (2) power injections to the BES that exceed the 20/75-MVA thresholds. The entity should not be required to provide detailed data and studies (as described in the "General Instructions") if either of those conditions would not have occurred but for an emergency situation.
No
A sub-question should be added to Question 1 asking: (1) Does the generation serve all or a part of retail customer Load, and (2) If so, the maximum net capacity of each unit injected to the BES during non-emergency conditions.
Yes
Our "Yes" response is conditioned on the comments to Questions 1 and 2 above.
Yes
It may be necessary that the exception request form explicitly address this potential problem by allowing the entity seeking an exception to state that for reasons beyond its control it failed to acquire the necessary data, base case or supporting document to enable completion of the filing.
Individual
Kirit Shah
Ameren
Yes
No
From our perspective, the first question should be "Is the facility connected at 100 kV or above?" The questions should be reordered. Of the questions listed, question #3 should be #1, and questions #1 should be the last question in this section. Regarding the word "permanent" as it is used to describe Flowgates, it is suggested that the word "limiting" or "constrained" be used instead.
No
It is suggested that question #2 be deleted and replaced with "Is the generator designated as a black-start unit in an entity's restoration plan?"
No
No
No
No
Group
William D Shultz
Southern Company Generation
Yes
In the third bullet under the list of study attributes, it is very important to specifically list the "key performance indicators of BES reliability". This will assist in pointing the studies to focus on the issues relevant to determining the signifacance of the exception request.
Yes
We agree with the information being requested.

No
We do not agree completely with the information being requested. For checklist item #2, please specify what is included in "providing Ancillary Services" for a generator. For #4, can the question include a measure of evaluating the "most severe system impact"? Can the specific study that is required to be evaluated be outlined?
Yes
An IPP with no Transmission Planning department may find it very difficult to perform an interconnection wide base case as required in the general instructions.
No
No
No
Individual
Guy Andrews
Georgia System Operations Corporation
No
: The last half of the first sentence should be changed to “do not have to seek an Exclusion Exception under the Exception Procedure for the Element(s).” The use of “Element(s)” relates back to that term at the start of the sentence, and the reference to an “Exclusion Exception” is necessary because an entity (albeit probably not the Owner), still may choose to seek an Inclusion Exception for such an Element(s). In the 3rd bullet, the reference should be to TPL standards (plural).
Yes
No
Item 2 asks about “the generator or generator Facility,” but 3, 4 and 5 only refer to the generator. There is no immediately apparent reason for them to be different. The language in Item 2 seems preferable.
No
Throughout the document, because it will be part of a larger Exception Request Form, it should, when possible, use terms consistent with the rest of that form (e.g., “Request” rather than “application”). Similarly, defined terms (even if only defined in the context of the Request Form in which these Principles will be used) such as “Exception,” “Request,” “Element” or “Facility” should be capitalized; if the use of lower case is intended to convey a different meaning than what is defined, another term should be used to avoid confusion. The Definition and Request Form generally use the term “Element,” so it is unclear why this document should so consistently use “facility.” For consistency, “Element(s)” or possibly “Element(s) or Facility” should be used.
Yes
Yes
No
Group
John Bussman
AECI
No
An opening statement of this form should make it clear that, prior to its determination, the Facilities within scope of this exemption request, remain included or excluded based upon the basic BES Definition Bright Line criteria Inclusions and Exclusions.

No
There is no basis in this draft Standard for including Item 6). Item 7) does appear appropriate within the Standard, but the intent of the four check-boxes is ambiguous.
No
Most of these questions appear relevant to the LN concept paper, but irrelevant to this standard's requirements. The last conditional of Item 5) must always be answered Yes, unless the local-network is islanded.
No
Group
Janelle Marriott Gill
Tri-State Generation and Transmission Assn., Inc. Energy Management
This question is actually asking two questions; Tri-State's answers would be No & Yes. There needs to be a better introduction to what and why the exception is being requested.
Again Yes/No is conflicting in the question. The requested information in#2 is too vague and may be subjective. If the information in#7 is requested in the planning stage the data would not be available. What objective criteria would be used to determine the state of the exception request?
Again Yes/No is conflicting in the question. Information requested in#4 is subjective and too vague.
Yes
It may be hard for a GO to get the information requested in #1 or #4.
No
No
Yes
TSGT believes that the proposed "Technical Principles for Demonstrating BES Exceptions Request" does not clearly define the basis for decisions to exclude or include, which will lead to inconsistent application by the Regions. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request. We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO.
Group
William Bush
Holland Board of Public works
Yes
The requirement to base flow studies on an "interconnection-wide base case" is likely to include many more lines and buses than necessary to model the impact of a facility that is not material to the BES. Holland BPW request the words "or regional reduction of such a case" be added after "interconnection-wide base case" to avoid unnecessary expense and detail if a more limited study set is adequate to demonstrate the lack of material impact of the facility(ies) in question.
Yes

Yes
Yes
On Page 4 Question 1, information on the host Balancing Authority's most severe single contingency may not be publically available and therefore difficult or impossible for a smaller entity to obtain. Even if the data is available, it may not be meaningful in a larger Balancing Authority area such as within MISO where the most severe contingency may be geographically and electrically remote. A more readily available and meaningful measure would be a comparison of the generator's capability as a percent of the peak load for the local Balancing Authority or sub-Balancing Authority, as applicable.
Yes
The following revisions should be made to the procedures: 1. The Technical Review Panel (TRP) provided for in Section 5.3 should not include any staff from the host Regional Entity. 2. The Regional Entity should be required to include an attestation of a qualified individual or individuals to support the factual and technical bases for the decision. This is necessary for purposes of establishing a record in the event of an appeal. If a dispute is appealed, there must be someone at the Regional Entity level that serves as the witness supporting the Regional Entity decision. Currently, there is no accountability for the arguments and suppositions put forth by the Regional Entity; no individuals that stand behind the technical bases proffered in the Regional Entity's written decision. Requiring a qualified individual to attest to the facts and technical arguments relied upon in arriving at the decision will ensure that someone at the Regional Entity level is prepared to take responsibility for reviewing a decision before it is issued, to stand behind the assertions and conclusions reached by the Regional Entity, and whom the Submitting Party may cross examine at hearing. 3. A party seeking an exception should have the right to request a hearing and should not be limited to a paper process. 4. The procedures should not permit the TRP or the Regional Entity to make a decision based upon information that is outside of the record placed before it. That is, the TRP and the Regional Entity may not, on their own, conduct an investigation or seek information independently from what has been presented to it. If the TRP or the Regional Entity requires additional information, it must be requested and provided transparently, and the Submitting Party must have an opportunity to comment upon or challenge that information before the TRP or the Regional Entity relies upon it in any way. This is not currently happening at the Regional Entity and NERC level – decisions have been made based upon documents and information that are not part of the record; the information is not shared with the Submitting Party (the party challenging registration) prior to (or after) a decision is made. 5. Section 5.2.2. should be revised as follows: "Upon Acceptance of the Exception Request, the Regional Entity and Submitting Party (and Owner, if different) shall confer to establish milestones in order to complete the substantive review of the Exception Request within six months after Acceptance of the Exception Request or within an alternative time period under Section 5.0. The Regional Entity and the Submitting Party (and Owner, if different) shall also discuss whether and to what extent a reduced compliance burden is appropriate during the review period. At the conclusion of the review period, the Regional Entity shall issue a notice (in accordance with Sections 5.2.3) stating is Recommendation that the Exception Request be approved or disapproved."
Individual
Andrew Gallo
City of Austin dba Austin Energy
Yes
AE agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. AE is concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. AE believes that at least four different kinds of documents would respond to the description: (i) one-line diagrams with breakers and switches (status); (ii) identification of relays by their ANSI device numbers; (iii) details of the DC control logic for ANSI devices; and, (iv) operational scheme

descriptions of the type used by system operators. Accordingly, we suggest the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details, such as breaker settings. AE suggests that a generic example of a completed form be available to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.
No
AE agrees that the checklist of items on pages two and three lists most of the information necessary to determine if an Exceptions Request is justified. We suggest three modifications to the proposed language to ensure consistency with Section 215 of the Federal Power Act, with the BES Definition, and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) AE suggests that a new question be added concerning the function of the facility, which would read: "Does the facility function as a local distribution facility rather than a Transmission facility? If yes, please provide a detailed explanation of your answer." AE makes this suggestion because Section 215(a)(1) of the FPA makes clear that "facilities used in the local distribution of electric energy" are excluded from the BES (16 U.S.C. § 824o(a)(1)) and the most recent draft of the BES definition incorporates the same language. AE believes a question to address the function of the Element or system subject to an Exception Request is necessary to determine whether the Element or system is "used" in local distribution and thereby to ensure observance of the statutory limit on the BES. Further, we believe a variety of information may be relevant to determining whether a particular facility functions as local distribution rather than as part of the BES. For example, if power is not scheduled across the facility or if capacity on the system is not posted on the relevant OASIS, it is likely to function as local distribution, not transmission. Similarly, if power enters the system and is delivered to load within the system rather than moving to load located on another system, its function is local distribution rather than transmission. AE proposes the language above as an open-ended question so the entity submitting the Exceptions Request can provide this and any other information it deems relevant to facility function. (2) AE suggests modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition and also helps distinguish between generators which have Blackstart capability and those designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (3) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While AE believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, there may be unusual circumstances where the information either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
Yes
AE agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information generally necessary to make a reasoned determination concerning the BES status of a generation facility. AE suggests three refinements to the questions: (1) Modify Question 2 by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, AE suggests modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load?" (3) For reasons

similar to those explained in our response to Question 2, a general “catch-all” question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.

Yes

The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the RE receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency (“MSSC”) to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.

Yes

As discussed in our responses to Questions 1 through 3, AE believes that certain additional questions are necessary to elicit all information relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information in the hands of the relevant Balancing Authority, Transmission Provider or other entity and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.

Yes

As discussed in more detail in our response to Question 2, AE believes it is necessary to address the function of an Element or system subject to an Exceptions Request to determine whether it is a “facilit[y] used in the local distribution of electric energy” and, therefore, excluded from the BES under Section 215(a)(1) of the Federal Power Act.

No

As a general matter, AE believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. AE also supports the Standards Drafting Team’s determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. AE agrees that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the REs.

Individual

Andy Pusztai

ATC LLC

No

Since an Exception Request may be for approval to designate identified Element(s) as either excluded from or included in the BES, the wording of the first sentence should be changed and the request should clearly indicate (e.g. exclusion/inclusion check boxes) whether the request regards exclusion or inclusion of the Element(s). Here is some draft wording for consideration: Entities that have Element(s) that are included under the BES definition and designations, but seek to have them designated as excluded from the BES or that that have Element(s) that are excluded under the BES definition and designations, but seek to have them designated as included in the BES should submit

an Exception Request according to the NERC Exception Procedures and provide detailed information to support the Exception Request as indicated below. In addition, ATC suggests the following clarifying edit. Entities that have BES Element(s) considered as excluded under the BES definition and designations, do not have to seek exception for those Elements under the Exception Procedure.
No
ATC proposes the following changes to Item #7: 7a. Are Firm Power Transfers scheduled to flow out of, or through, this facility into the BES in the operating horizon? [for BES designations applicable to the operating horizon] Note: The consideration for power flowing into the BES should be based on normal operating conditions or base case (n-0 contingency analysis), not on historical real-time telemetry. 7b. Are Firm Power Transfers reserved to flow out of, or through, this facility into the BES in the planning horizon? [for BES designations applicable to the planning horizon)
Yes
No
No
No
No
Group
David Taylor
David.Taylor@nerc.net
Yes
No
In addition to describing how an outage of the facility under consideration affects the rest of the BES, the Submitting Entity also should be required to provide an assessment of how outages of BES facilities affect the facility under consideration. This could be achieved with powerflow studies or distribution factor analysis.
No
For units designated as must run, the Submitting Entity should be required to describe the reasons for which the unit has been so designated. We believe the general requirement to provide an appropriate reference is too vague, and should be appended with ". . . including a description of why the unit has been designated as must run and if applicable, the contingencies that would result in violation of the NERC Reliability Standards if the unit was not must run."
No
No
No
Yes
At a minimum, we believe there are some facilities which should not be excluded from the BES under any circumstances and a list of such facilities should be documented, including facilities such as (1) Elements that are relied on in the determination of an Interconnection Reliability Operating Limit (IROL); (2) Blackstart resources and the designated blackstart Cranking Paths identified in the Transmission Operator's restoration plan regardless of voltage, (3) Elements subject to Nuclear Plant Interface Requirements (NPIRs) as agreed to by a Nuclear Plant Generator Operator and a Transmission Entity defined in NUC-001, (4) Elements identified as required to comply with a NERC Reliability Standard by application of criteria defined within the standard (e.g., the test defined in

PRC-023 to identify sub-200 kV Elements to which the standard is applicable), and (5) a generating unit that is designated as a must run unit to assure reliability of the BES. Also, to make the process of reviewing exception applications consistent and transparent some high level guidance should be developed as to how the information provided will be assessed by the Regional Entities and NERC. In addition to supporting the objectives of consistency and transparency, this also would provide benefit to entities submitting an exception application by allowing them to understand how the Required Information will be evaluated.

Individual

David Kahly

Kootenai Electric Cooperative

Yes

KEC agrees generally that the General Instructions set forth the basic information that would be necessary to support an Exception Request. KEC is concerned, however, that the statement "diagram(s) supplied should also show the Protection Systems at the interface points associated with the Elements for which the exception is being requested" may be subject to differing interpretations. KEC envisions that at least four different kinds of documents would be responsive to the description: one-line diagrams with breakers and switches (status); identification of relays by their ANSI device numbers; details of the DC control logic for ANSI devices; and, operational scheme descriptions of the type used by system operators. Accordingly, we suggest that the language be refined to identify the specific kinds of diagrams necessary to identify protection systems at the interface with the Elements for which the Exception is sought, including any required details. KEC suggests that a generic example of a completed form be provided to the industry to help ensure that Exception Requests are supported by consistent and complete information. Such a generic example could be addressed in the Phase 2 BES efforts.

No

KEC agrees that the checklist of items on pages two and three lists most of the information that would be necessary to determine if an Exceptions Request is justified. We suggest three modifications to the proposed language to ensure consistency with Section 215 of the Federal Power Act, with the BES Definition, and to provide an entity seeking an Exception with the opportunity to submit all relevant information: (1) KEC suggests that a new question should be added concerning the function of the facility, which would read: "Does the facility function as a local distribution facility rather than a Transmission facility? If yes, please provide a detailed explanation of your answer." Section 215(a)(1) of the FPA makes clear that "facilities used in the local distribution of electric energy" are excluded from the BES, 16 U.S.C. § 824o(a)(1), and the most recent draft of the BES definition incorporates the same language. KEC believes a question to address the function of the Element or system subject to an Exception Request is necessary to determine whether the Element or system is "used" in local distribution and thereby to ensure that this statutory limit on the BES is observed in the Exceptions process. Further, we believe a variety of information may be relevant to determining whether a particular facility functions as local distribution rather than as part of the BES. For example, if power is not scheduled across the facility or if capacity on the system is not posted on the relevant OASIS, it is likely to function as local distribution, not transmission. Similarly, if power enters the system and is delivered to load within the system rather than moving to load located on another system, its function is local distribution rather than transmission. KEC proposes the language above as an open-ended question so that the entity submitting the Exceptions Request can provide this and any other information it deems relevant to facility function. (2) KEC suggests modifying question 6 to "Is the facility part of a designated Cranking Path associated with a Blackstart Resource identified in a Transmission Operator's restoration plan." This language reflects the most recent revision of the BES Definition, which removes the reference to "Cranking Paths," and also helps distinguish between generators which have Blackstart capability and those generators that are designated as a Blackstart Resource in the Transmission Operator's restoration plan. It is only the latter that are included in the BES under the current draft of the definition. (3) A general "catch-all" question should be added that will prompt the entity submitting an Exception Request to submit any information it believes is relevant to the Exception that is not captured in the other questions. We suggest the following language: Is there additional information not covered in the questions above that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. While KEC believes the questions set forth in the draft capture the information that generally would be necessary to determine whether an Exception Request should be granted, it is

foreseeable that there may be unusual circumstances where the information called for either does not capture the full picture or where studies other than the specific types called for in the draft form support the Exception. An entity seeking an Exception should have the opportunity to present any information it believes is relevant.
Yes
KEC agrees that the items listed on page 4 of the Detailed Information to Support an Exception Request capture the information that generally would be necessary to make a reasoned determination concerning the BES status of a generation facility. KEC suggests three refinements to the questions: (1) Question 2 should be modified by adding "necessary for the operation of the interconnected bulk transmission system" to the end of the question, so that it reads: "Is the generator or the generator facility used to provide Ancillary Services necessary for the operation of the interconnected bulk transmission system?" The italicized language is necessary to distinguish between a generator that provides, for example, reactive power or regulating reserves that support operation of the interconnected bulk grid, and, for example, a behind-the-meter generator that provides back-up generation to a specific industrial facility. The former may be necessary for the reliable operation of the interconnected bulk transmission system, but the latter is not. (2) The current draft of the BES Definition contains Exclusions for radials and for Local Networks. To be consistent with these aspects of the revised BES definition, KEC suggests modifying question 5 by adding "radial, or Local Network" to the question, so that it would read: "Does the generator use the BES, a radial system, or a Local Network to deliver its actual or scheduled output, or a portion of its actual or scheduled output, to Load? (3) For reasons similar to those explained in our response to Question 2, a general "catch-all" question should be added that will prompt an entity submitting an Exception Request for a generator to submit any information it believes is relevant to the Exception that is not captured in the previous questions. We suggest the following language: Is there additional information not covered in questions 1 through 5 that supports the Exception Request? If yes, please provide the information and explain why it is relevant to the Exception Request. This will allow an entity seeking an Exception for a generator to identify any unusual circumstances or non-standard information that might support its Exception Request. An entity seeking such an Exception should have the opportunity to present any information it believes is relevant.
Yes
The Standards Drafting Team should consider whether it is necessary to require entities other than the entity filing the Exception Request to provide relevant information, either to the entity filing the Exception Request or to the RE receiving the Exceptions Request. For example, in order to answer Question 1 on page 4, regarding the impact of the generator under the most severe single contingency, it may be necessary for the relevant Balancing Authority to provide its Most Severe Single Contingency ("MSSC") to the registered entity seeking an Exception. Similarly, the relevant Transmission Operator or Balancing Authority may have information that is necessary to determine whether the generator has been designated as reliability-must-run or if it provides ancillary services supporting reliable operation of the interconnected transmission grid.
Yes
As discussed in our responses to Questions 1 through 3, KEC believes that certain additional questions are necessary to elicit all information that may be relevant to an Exceptions Request. As discussed in our answer to Question 4, we are also concerned that it may be necessary to obtain information that is in the hands of the relevant Balancing Authority, Transmission Provider, or other entity, and not in the hands of the entity submitting an Exceptions Request, to develop a complete record upon which a reasoned decision concerning an Exceptions Request can be based.
Yes
As discussed in more detail in our response to Question 2, KEC believes it is necessary to address the function of an Element or system that is subject to an Exceptions Request to determine whether it is a "facilit[y] used in the local distribution of electric energy" and therefore excluded from the BES under Section 215(a)(1) of the Federal Power Act.
No
As a general matter, KEC believes the SDT has provided a reasonable check list that will work in most cases to elicit necessary information from the entity submitting an Exception Request. With the added language suggested in our answers to the previous questions, we believe the proposed form will serve its intended purpose of ensuring that decisions regarding Exception Requests are based upon

consistent information and are consistent with the requirements of the Federal Power Act and the BES Definition as developed by the Standards Drafting Team. KEC also supports the Standards Drafting Team's determination to abandon its initial approach to technical criteria, which would have required adherence to specific numerical thresholds. KEC agrees that this approach was not workable on a nationwide basis, and that the approach embodied in the current draft of the Technical Principles, which would require specific kinds of information on a generic basis but would leave engineering judgment about the significance of that information to the relevant RE, is more workable and provides appropriate deference to the experience and judgment of the REs.
Group
Silvia Parada Mitchell
Corporate Responsibility Organization
Yes
Yes
"Impact" and "degree of impact" in question 2 should be framed with the criteria expected.
Yes
No
No
No
No
Group
Sandra Shaffer
PacifiCorp
Yes
No
Question 6 implies that if the facility is part of a designated blackstart cranking path then an exception request would most likely be denied. To the extent that was the intent, such an assumption would only be reasonable if the blackstart cranking path is the only path available. However, PacifiCorp suggests modifying the current Question 6 to reflect a situation in which multiple cranking paths are available, as follows: "6A. Is the facility part of a Cranking Path associated with a Blackstart Resource? 6B. If yes, does the Blackstart Resource have other viable Cranking Paths?"
Yes
PacifiCorp suggests modifying Question 3 as follows: "Is the generator designated as a must run unit by the Balancing Authority?"
No
PacifiCorp is speaking from a perspective where the Company is registered for multiple functions (i.e., TO, GO, TOP, GOP, BA, TPL, etc.) and the requested information is currently available from Company resources.
No
No
No
Individual

Linda Jacobson-Quinn
Farmington Electric Utility System
No
The general instructions presented are primarily components to substantiate an Exception Request. However, a cover sheet (template) should be created that includes overall identifying information of the Submitting Entity and the and the Owner if the if they are not the same – the template should align with the draft Appendix 5C Section 4.5.1 of the NERC Rules of Procedure. An Exception Request can be submitted for Inclusion or Exclusion of the BES. The first sentence in the form, "Entities that have Element(s) designated as excluded, under the BES definition and designations, so not have to seek exception for those Element(s) under the Exception Procedure. This would not be true if a Submitting Entity is seeking an Inclusion Exception. FEUS recommends revising to include Inclusion Exception Requests.
No
The form should be titled "For Transmission Elements" rather than "Facilities" to align with the BES definition and Appendix 5C of the NERC Rules of Procedure. The form should align with section 4.5.1 and 4.5.2 of Appendix 5C. It should include a listing of the Element(s) and the status based on the application of the BES Definition. Question 6 relates to a 'facility' that is part of a Cranking Path. The latest revision of the BES Definition removed the designated blackstart Cranking Paths from the Inclusion of the BES in I3. Having a question regarding the Cranking Path in the Exception Request makes it appear Cranking Paths are still automatically included in the BES. Question 7; what is an alternate method if a Requesting Entity does not have SCADA data for the most recent two consecutive calendar years.
No
Question 1, the SDT team should consider if the Submitting Entity or Owner is part of a Reserve Sharing Group. The host BA's most single severe Contingency vs the obligation of reserves required as part of a Reserve Sharing Group may be substantial. The SDT team should clarify if it is a single generator or if it is the aggregate at a facility.
Yes
See response to question 2
Yes
The SDT should consider additional limits on Generation. For example, if a generation prime mover (turbine) has a maximum output of 35 MW but is coupled to a generator with a rating in excess of 75 MVA. The generator output is limited by the turbine - thus the rating of the turbine should be a taken into consideration rather than the generator rating.
No
No
Individual
Mary Downey
City of Redding Electric Utility
Yes
Yes
Yes
Yes
Yes
Yes

Yes
Redding acknowledges there is an immediate need for a method where an entity can present evidence that their facilities are “not necessary for the Reliable Operation of the interconnected bulk power transmission system” as stated in the NERC Rules of Procedure Section 3.0. “BASIS FOR APPROVAL OF AN EXCEPTION.” Without a process to present the evidence then the RE and the ERO are under no mandate to review facilities in light of any criteria besides the BES definition as NERC clearly pointed out in the City of Holland case where they were forced to register by the RE (RFC). However, Redding also is very concerned that under the proposed Exception process the final evaluation of an element or facility is left to the sole judgment of NERC. The concern is there is no method, criteria, measurement, or standard that NERC will use for the evaluation. It is also a concern that NERC has a predetermined definition of Distribution Facilities and will not evaluate networked distribution facilities fairly. NERC has already stated their predetermined position as to what they determine to be distribution and not distribution facilities in their “MOTION TO INTERVENE AND COMMENTS OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION” filed in the case of the City of Holland, Michigan (Docket No. RC11-5-000). On page 10 and 11 of this motion, under the section labeled “A. Holland’s 138 kV lines are transmission rather that local distribution facilities” NERC states “Distribution facilities generally are characterized as elements that are designed and can carry electric energy (Watts/MW) in one direction only at any given time from a single source point (distribution substation) to final load centers.” NERC clearly states that only radial facilities are considered distribution facilities and are unwilling to consider that network facilities over 100Kv could be classified as Distribution Facilities. Holland’s claim of NERC over reaching their authority appears to have credibility. In conclusion, Redding supports this exception process as it stands because it does allow an entity the right to a process which NERC is currently not obligated to allow, it requires that NERC judge the facilities on the merit of “necessary for the Reliable Operation of the interconnected bulk power transmission system”, and it allows an appeals process that must judge if NERC evaluated facilities on the standard set forth. However, Redding’s vote is conditional on the completion of phase 2 where the term “necessary for the Reliable Operation of the interconnected bulk power transmission system” needs to be defined.
Individual
Paul Cummings
City of Redding
Yes
Yes
Yes
No
No
No
Yes
Redding acknowledges there is an immediate need for a method where an entity can present evidence that their facilities are “not necessary for the Reliable Operation of the interconnected bulk power transmission system” as stated in the NERC Rules of Procedure Section 3.0. “BASIS FOR APPROVAL OF AN EXCEPTION.” Without a process to present the evidence then the RE and the ERO are under no mandate to review facilities in light of any criteria besides the BES definition as NERC clearly pointed out in the City of Holland case where Holland was forced to register by the RE (RFC). However, Redding is very concerned that under the proposed Exception process the final evaluation of an element or facility is left to the sole judgment of NERC. The concern is there is no method, criteria, measurement, or standard that NERC will use for the evaluation. It is also a concern that NERC has a

predetermined definition of Distribution Facilities and will not evaluate networked Distribution Facilities fairly. NERC has already stated their predetermined position as to what they determine to be distribution and not distribution facilities in their “MOTION TO INTERVENE AND COMMENTS OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION” filed in the case of the City of Holland, Michigan (Docket No. RC11-5-000). On page 10 and 11 of this motion, under the section labeled “A. Holland’s 138 kV lines are transmission rather that local distribution facilities” NERC states “Distribution facilities generally are characterized as elements that are designed and can carry electric energy (Watts/MW) in one direction only at any given time from a single source point (distribution substation) to final load centers.” NERC has clearly stated that only radial facilities are considered distribution facilities and were unwilling to consider that network facilities over 100Kv could be classified as Distribution Facilities in this case. Holland’s claim of NERC over-reaching their authority appears to have credibility. In conclusion, Redding supports the proposed exception process as it stands on the grounds that it allows an entity the right to a process which NERC is currently not obligated to allow, it requires that NERC judge the facilities on the merit of “necessary for the Reliable Operation of the interconnected bulk power transmission system”, and it allows an appeals process that must judge if NERC evaluated facilities on the standard set forth. However, Redding’s vote is conditional on the completion of phase 2 where the term “necessary for the Reliable Operation of the interconnected bulk power transmission system” needs to be defined.
Individual
Edwin Tso
Metropolitan Water District of Southern California
No
General Comments: Metropolitan Water District of Southern California (“MWDSC”) believes that additional work is necessary to explain how this Detailed Information to Support an Exception Request will be used in evaluating whether a transmission facility will be an exception to the BES. In addition, MWDSC agrees WECC that the proposed Technical Principles for Demonstrating BES Exceptions Request is lack of clarity. It does not provide detail information as to what entities must provide to support their requests, nor does it provide any criteria for consistency among regions in their assessment of requests. Lastly, the current proposal leaves it to each region to develop its own methodology and criteria for evaluating the technical studies. MWDSC believes that drafting team should establish a common method and criteria to apply continent-wide in achieving uniformity and consistency among regions in their assessment of exception requests. Comments to Checklist #4: MWDSC recommends the following changes to emphasize facility impact on the interconnection of the BES: “How does an outage of the facility impact the over-all reliability of to the interconnection of the BES?” Comments to Checklist #7: What percentage of power flow through entity’s facility into the BES will be considered as an exception to the BES?
Group
Al DiCaprio
PJM
Yes
No
We agree with most parts on P.2 and P.3, but question the need for Q6, which asks: “Is the facility part of a Cranking Path associated with a Blackstart Resource?” I3 in the BES definition stipulates that Blackstart Resources identified in the Transmission Operator’s restoration plan be included (which we disagree and commented in the BES Definition Comment Form). There is no inclusion of any transmission facilities that are part of the cranking path. We suggest this item (Q6) be removed.
We do not agree with the detailed information requirements for generators. In a deregulated

environment, generators are free to bid into the market or offer their availability, to dispatched based on bid price and resource needs, or overall generation dispatch plans. A generator may be on line but not dispatched, or not on line at all due to maintenance outage or a decision to not start. Its status and generation level have little to do in determining whether or not it needs to be included as a BES facility. Rather, it is the generator's active contribution to the BES performance, namely, its protective relay setting and coordination with those of related facilities and its ability to control voltage, respond to contingencies, ride through frequency and voltage excursion, provide accurate model with verification, etc., are critical to BES reliability performance. There are currently no standards or requirements that mandate a generator to be on line or to attain a specific level of output, and we do not see such a need at all in the future. Whether or not the unit is designed as a MUST RUN will depend on whether the generator is (a) on line and bid into the market or be included in the dispatch plan, and (b) the prevailing system conditions such as flow pattern, potential constraints, etc. A generator may be designated as a MUST RUN one day but not the others. Similar argument applies to a generator bidding in the ancillary service markets, or be dispatched to provide reserve or AGC control capability. In our view, generators' physical characteristics and their response to changes on the BES are important considerations for them to be included in the BES. These characteristics affect the assessment and actual performance of the BES in the following key areas: • Voltage and frequency ride through capability • Voltage control (AVR, etc.) • Underfrequency trip setting • Protection relay setting coordination • Data submission for modeling; verification of capability and model We therefore suggest that the entire P.4 be removed as the information it asks for has nothing to do with a generator's physical characteristics or material impact on BES reliability. Having a threshold by MVA suffices to determine if a generator needs to be included as a BES facility, whose characteristics, expected performance and data provision are important to achieve target BES performance and hence should be governed by reliability standards.

No

Yes

One acid test to determine if a facility needs to be included or can be excluded from a BES facility is to simulate an uncleared fault at that facility. If the simulation shows a stable BES performance, then it suggests that even if the fault is not cleared due to whatever reason, the facility has no adverse impact that can lead to instability, cascading or collapse of the BES.

Individual

Rex Roehl

Indeck Energy Services

Yes

As acknowledged in the response to Question 12 comments on the previous BES definition, the BES definition is expansive compared to the definition of the BPS in the FPA Section 215. The inclusion of the limited Exclusions is an attempt to remedy the situation. However, the Exclusions need to include a fifth one that if, based on studies or other assessments, it can be shown that any tranmission or generator element otherwise identified as part of the BES is not important to the reliability of the BPS, then that element should be excluded from the mandatory standards program. There has never been a study to show that elements, such as a 20 MW wind farm, 60 MW merchant generator (which operates infrequently in the depressed market) in a large BA (eg NYISO) or a radial transmission line connecting a small generator are important to the reliability of the BPS. They are covered by the mandatory standards program through the registration criteria. The BES Definition is the opportunity to permit an entity to demonstrate that an element is unimportant to reliability of the BPS. The SDT has identified a small subset of elements that it is willing to exclude. By their very nature, these exclusions dim the bright line that is the stated goal of this project. However, the SDT's foresight seems limited in its selections. Analytical studies are used to evaluate contingencies that could lead to

the Big Three (cascading outages, instability or voltage collapse). Such a study showing that a transmission or generation element is bounded by the N-1 or N-2 contingency would exclude it from the BES definition. For example, in a BA with a NERC definition Reportable Disturbance of approximately 400 MW (eg NYISO), a 20 MW wind farm, 60 MW merchant generator or numerous other smaller facilities would be bounded by larger contingencies. It would take more than six 60 MW merchant generators with close location and common mode failure to even be a Reportable Disturbance, much less become the N-1 contingency for the Big Three. Exclusion E5 should be “E5 - Any facility that can be demonstrated to the Regional Entity by analytical study or other assessment to be unimportant to the reliability of the BPS (with periodic reports by the Regional Entity to NERC of any such assessments).”
Yes
As acknowledged in the response to Question 12 comments on the previous BES definition, the BES definition is expansive compared to the definition of the BPS in the FPA Section 215. The inclusion of the limited Exclusions is an attempt to remedy the situation. However, the Exclusions need to include a fifth one that if, based on studies or other assessments, it can be shown that any tranmission or generator element otherwise identified as part of the BES is not important to the reliability of the BPS, then that element should be excluded from the mandatory standards program. There has never been a study to show that elements, such as a 20 MW wind farm, 60 MW merchant generator (which operates infrequently in the depressed market) in a large BA (eg NYISO) or a radial transmission line connecting a small generator are important to the reliability of the BPS. They are covered by the mandatory standards program through the registration criteria. The BES Definition is the opportunity to permit an entity to demonstrate that an element is unimportant to reliability of the BPS. The SDT has identified a small subset of elements that it is willing to exclude. By their very nature, these exclusions dim the bright line that is the stated goal of this project. However, the SDT’s foresight seems limited in its selections. Analytical studies are used to evaluate contingencies that could lead to the Big Three (cascading outages, instability or voltage collapse). Such a study showing that a transmission or generation element is bounded by the N-1 or N-2 contingency would exclude it from the BES definition. For example, in a BA with a NERC definition Reportable Disturbance of approximately 400 MW (eg NYISO), a 20 MW wind farm, 60 MW merchant generator or numerous other smaller facilities would be bounded by larger contingencies. It would take more than six 60 MW merchant generators with close location and common mode failure to even be a Reportable Disturbance, much less become the N-1 contingency for the Big Three. Exclusion E5 should be “E5 - Any facility that can be demonstrated to the Regional Entity by analytical study or other assessment to be unimportant to the reliability of the BPS (with periodic reports by the Regional Entity to NERC of any such assessments).”
Yes
As acknowledged in the response to Question 12 comments on the previous BES definition, the BES definition is expansive compared to the definition of the BPS in the FPA Section 215. The inclusion of the limited Exclusions is an attempt to remedy the situation. However, the Exclusions need to include a fifth one that if, based on studies or other assessments, it can be shown that any tranmission or generator element otherwise identified as part of the BES is not important to the reliability of the BPS, then that element should be excluded from the mandatory standards program. There has never been a study to show that elements, such as a 20 MW wind farm, 60 MW merchant generator (which operates infrequently in the depressed market) in a large BA (eg NYISO) or a radial transmission line connecting a small generator are important to the reliability of the BPS. They are covered by the mandatory standards program through the registration criteria. The BES Definition is the opportunity to permit an entity to demonstrate that an element is unimportant to reliability of the BPS. The SDT has identified a small subset of elements that it is willing to exclude. By their very nature, these exclusions dim the bright line that is the stated goal of this project. However, the SDT’s foresight seems limited in its selections. Analytical studies are used to evaluate contingencies that could lead to the Big Three (cascading outages, instability or voltage collapse). Such a study showing that a transmission or generation element is bounded by the N-1 or N-2 contingency would exclude it from the BES definition. For example, in a BA with a NERC definition Reportable Disturbance of approximately 400 MW (eg NYISO), a 20 MW wind farm, 60 MW merchant generator or numerous other smaller facilities would be bounded by larger contingencies. It would take more than six 60 MW merchant generators with close location and common mode failure to even be a Reportable Disturbance, much less become the N-1 contingency for the Big Three. Exclusion E5 should be “E5 -

Any facility that can be demonstrated to the Regional Entity by analytical study or other assessment to be unimportant to the reliability of the BPS (with periodic reports by the Regional Entity to NERC of any such assessments)."
Individual
Keith Morisette
Tacoma Power
Yes
Tacoma Power supports the instructions as written.
Yes
Tacoma Power supports the information requested on page 2 and 3.
Yes
Tacoma Power supports the information requested on page 4.
No
Tacoma Power supports the expectation that entities will be able to supply the information requested.
No
Tacoma Power does not know of any characteristics to add at this time.
No
Tacoma Power is not aware of any conflicts at this time.
Yes
Tacoma Power has a concern that the form may be too general in nature. The task before NERC and the industry is to promote consistency in the application of the BES definition. The form will require the regions to develop individual criteria for assessing an exception request and making a recommendation on the request. We recommend in Phase 2 that the SDT develop specific evaluation criteria for the regions to apply to an exception request. Thank you for consideration of our comments.
Individual
Tracy Richardson
Springfield Utility Board
Yes
SUB agrees with the instructions, finding them to be clear and reasonable.
Yes
SUB agrees with the instructions, finding them to be clear and reasonable.
No SUB comments as this is not currently applicable to SUB operations.
No
No
Individual
Frank Cumpton
BGE
Yes
No comment.
Yes
No comment.
Yes
No comment.
No

No comment.
No
No comment.
No
No comment.
No
No comment.
Individual
Gary Carlson
Michigan Public Power Agency
Yes
The requirement to base flow studies on an “interconnection-wide base case" is likely to include many more lines and buses than necessary to model the impact of a facility that is not material to the BES. MPPA and its members request the words “or regional reduction of such a case” be added after “interconnection-wide base case” to avoid unnecessary expense and detail if a more limited study set is adequate to demonstrate the lack of material impact of the facility(ies) in question.
Yes
Yes
Yes
On Page 4 Question 1, information on the host Balancing Authority’s most severe single contingency may not be publically available and therefore difficult or impossible for a smaller entity to obtain. Even if the data is available, it may not be meaningful in a larger Balancing Authority area such as within MISO where the most severe contingency may be geographically and electrically remote. A more readily available and meaningful measure would be a comparison of the generator’s capability as a percent of the peak load for the local Balancing Authority or sub-Balancing Authority, as applicable.
No
No
Yes
The following revisions should be made to the procedures: 1. The Technical Review Panel (TRP) provided for in Section 5.3 should not include any staff from the host Regional Entity. 2. The Regional Entity should be required to include an attestation of a qualified individual or individuals to support the factual and technical bases for the decision. This is necessary for purposes of establishing a record in the event of an appeal. If a dispute is appealed, there must be someone at the Regional Entity level that serves as the witness supporting the Regional Entity decision. Currently, there is no accountability for the arguments and suppositions put forth by the Regional Entity; no individuals that stand behind the technical bases proffered in the Regional Entity’s written decision. Requiring a qualified individual to attest to the facts and technical arguments relied upon in arriving at the decision will ensure that someone at the Regional Entity level is prepared to take responsibility for reviewing a decision before it is issued, to stand behind the assertions and conclusions reached by the Regional Entity, and whom the Submitting Party may cross examine at hearing. 3. A party seeking an exception should have the right to request a hearing and should not be limited to a paper process. 4. The procedures should not permit the TRP or the Regional Entity to make a decision based upon information that is outside of the record placed before it. That is, the TRP and the Regional Entity may not, on their own, conduct an investigation or seek information independently from what has been presented to it. If the TRP or the Regional Entity requires additional information, it must be requested and provided transparently, and the Submitting Party must have an opportunity to comment upon or challenge that information before the TRP or the Regional Entity relies upon it in any way. This is not currently happening at the Regional Entity and NERC level – decisions have been made based upon

documents and information that are not part of the record; the information is not shared with the Submitting Party (the party challenging registration) prior to (or after) a decision is made. 5. Section 5.2.2. should be revised as follows: "Upon Acceptance of the Exception Request, the Regional Entity and Submitting Party (and Owner, if different) shall confer to establish milestones in order to complete the substantive review of the Exception Request within six months after Acceptance of the Exception Request or within an alternative time period under Section 5.0. The Regional Entity and the Submitting Party (and Owner, if different) shall also discuss whether and to what extent a reduced compliance burden is appropriate during the review period. At the conclusion of the review period, the Regional Entity shall issue a notice (in accordance with Sections 5.2.3) stating is Recommendation that the Exception Request be approved or disapproved."

Additional Comments Submitted: Salt River Project

Detailed Information to Support BES Exceptions Request:
SRP agrees with the WECC Staff recommendation on the "Detailed Information to Support BES Exceptions Request."

"WECC Staff believes that the proposed Technical Principles for Demonstrating BES Exceptions Request does not provide the necessary clarity as to what applying entities must provide to support their request, nor does it provide any criteria for consistency among regions in their assessment of requests. We believe that the checklist items for transmission and generation facilities are appropriate questions that must be answered in considering all requests. However, without objective criteria defining what must be submitted and how to assess the materials submitted, the current methodology leaves it to each region to develop their own methodology and criteria for evaluating the submittals. We believe the lack of clarity regarding what studies must be submitted and what must be demonstrated by the studies submitted will be overly burdensome on the submitting entity and the

Region, as multiple studies may be required for the two to agree that there is sufficient justification for an exemption request.

We believe that additional work is necessary to develop clear, objective methods and criteria for identifying which facilities may be excluded from or should be included in the Bulk Electric System. Clear, objective methods and criteria will enable the submitter of requests to understand what is necessary for submitting an exception request and will provide for consistency among the regions in their initial assessment and recommendations to the ERO."