

Initial Ballot Results — Project 2010-12: Order 693 Directives

Ballot Results	
Ballot Name:	Project 2010-12: Order 693 Directives ¹
Ballot Period:	July 2–14, 2010
Ballot Type:	Initial
Total # Votes:	217
Total Ballot Pool:	295
Quorum:	73.55% ²
Weighted Segment Vote:	See below (multiple ballots)
Ballot Results:	Some changes will proceed to recirculation ballots, while others have been withdrawn.

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
321	The Commission adopts the NOPR’s proposal to require the ERO to develop a modification to the Reliability Standard that refers to the ERO rather than to the NERC Operating Committee in Requirements R4.2 and R6.2. The ERO has the responsibility to assure the reliability of the Bulk-Power System and should be the entity that modifies the Disturbance Recovery Period as necessary.	60.96%	BAL-002-1	DELETED SENTENCES IN R4.2 AND R6.2 THAT ALLOWED CHANGES WITH OC APPROVAL.
321	As identified in the Applicability Issues section, the Commission directs the ERO to modify this Reliability Standard to substitute Regional Entity for regional reliability organization as the compliance monitor.		BAL-002-1	NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION
330	We direct the ERO to submit a modification to BAL-002-0 that includes a Requirement that explicitly provides that DSM may be used as a resource for contingency reserves, subject to the clarifications provided below.	49.90%	BAL-002-1	WITHDRAWN FROM BALLOT

¹ Conducted as multiple ballots

² Though the initial ballots did not reach quorum, the Standards Committee has agreed (for this project only) to move proposed changes to recirculation ballots, recognizing the extraordinary effort already put forward by stakeholders to assist in getting these revisions to the NERC Board of Trustees and the challenges some stakeholders faced in accessing the ballots.

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
335	Accordingly, the Commission directs the ERO to explicitly allow DSM as a resource for contingency reserves, and clarifies that DSM should be treated on a comparable basis and must meet similar technical requirements as other resources providing this service.	41.86%	BAL-002-1	WITHDRAWN FROM BALLOT
1232	We approve the ERO’s definition in the glossary of DSM as “all activities or programs undertaken by a Load-Serving Entity or its customers to influence the amount or timing of electricity they use.” Only activities or programs that meet the ERO definition, with the modification directed below, may be treated as DSM for purposes of the Reliability Standards. Recognizing the potential role that industrial customers who do not take service through an LSE and load aggregators, for example, may play in meeting the Reliability Standards, we direct the ERO to modify the definition of DSM. Specifically, we direct the ERO to add to its definition of DSM “any other entities” that undertake activities or programs to influence the amount or timing of electricity they use without violating other Reliability Standard Requirement.	48.99%	BAL-002-1	WITHDRAWN FROM BALLOT
404	The Commission clarifies that its direction to the ERO in this section is for it to develop a modification to BAL-005-0 through the Reliability Standards development process that changes the title of the Reliability Standard to be neutral as to the source of regulating reserves and allows the inclusion of technically qualified DSM and direct control load management as regulating reserves, subject to the clarifications provided in this section.	62.16%	BAL-005-1	WITHDRAWN FROM BALLOT
415	Both Xcel and FirstEnergy question Requirement R17 but do not oppose the Commission’s proposal to approve this Reliability Standard. Earlier in this Final Rule, we direct the ERO to consider the comments received to the NOPR in its Reliability Standards development process. Thus, the comments of Xcel and FirstEnergy should be addressed by the ERO when this Reliability Standard is revisited as part of the	61.59%	BAL-005-1	WITHDRAWN FROM BALLOT

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
	<p>ERO's Work Plan.</p> <p>410. Xcel requests that the Commission reconsider Requirement R17 of this Reliability Standard stating that the accuracy ratings for older equipment (current and potential transformers) may be difficult to determine and may require the costly replacement of this older equipment on combustion turbines and older units while adding little benefit to reliability. Xcel states that the Commission should clarify that Requirement R17 need only apply to interchange metering of the balancing area in those cases where errors in generating metering are captured in the imbalance responsibility calculation of the balancing area.</p> <p>411. FirstEnergy states that Requirement R17 should include only "control center devices" instead of devices at each substation. FirstEnergy states that accuracy at the substation level is unnecessary and the costs to install automatic generation control equipment at each substation would be high. FirstEnergy also states that the term "check" in Requirement R17 needs to be clarified.</p>			
420	<p>The Commission approves Reliability Standard BAL-005-0 as mandatory and enforceable. In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to BAL-005-0 through the Reliability Standards development process that changes the title of the Reliability Standard to be neutral as to the source of regulating reserves and to allow the inclusion of technically qualified DSM and direct control load management</p>	54.82%	BAL-005-1	WITHDRAWN FROM BALLOT

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
420	The Commission approves Reliability Standard BAL-005-0 as mandatory and enforceable. In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to BAL-005-0 through the Reliability Standards development process that clarifies Requirement R5 of this Reliability Standard to specify the required type of transmission or backup plans when receiving regulation from outside the balancing authority when using nonfarm service		BAL-005-1	WITHDRAWN FROM BALLOT
565	The Commission agrees with ISO-NE that the Reliability Standard should be clarified to indicate that the actual emergency plan elements, and not the “for consideration” elements of Attachment 1, should be the basis for compliance. However, all of the elements should be considered when the emergency plan is put together.	78.45%	EOP-001-2	WITHDRAWN FROM BALLOT – ALREADY ADDRESSED IN PREVIOUS VERSION OF STANDARD.
571	As we stated in the NOPR, neither EOP-002-2 nor any other Reliability Standard addresses the impact of inadequate transmission during generation emergencies. The Commission agrees with MRO that “insufficient transmission capability” could be due to various causes. The ERO should examine whether to clarify this term in the Reliability Standards development process.	55.39%	EOP-001-2	WITHDRAWN FROM BALLOT
577	A number of commenters agree that the TLR procedure is an inappropriate and ineffective tool for mitigating actual IROL violations or for use in emergency situations. On the other hand, International Transmission believes the TLR procedure can be an appropriate and effective tool to mitigate IROL violations or for use in emergency situations and MISO argues that operators should not be precluded from implementing the TLR procedure during emergencies. The Commission disagrees. As explained in the NOPR and in the Blackout Report, actions undertaken under the TLR procedure are not fast and predictable enough for use in situations in which an operating security limit is close to being, or actually is being, violated. As	96.05%	EOP-002-3 (No changes to standard)	NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION – BELIEVED TO ALREADY BE ADDRESSED IN IRO-006-4, SO NO CHANGES TO STANDARD NEEDED.

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
	such the Commission cannot agree with International Transmission and MISO. However, the Commission agrees with APPA, EEI, Entergy and MidAmerican that the TLR procedure may be appropriate and effective for use in managing potential IROL violations. Accordingly, the Commission will maintain its direction that the ERO modify the Reliability Standard to ensure that the TLR procedure is not used to mitigate actual IROL violations.			
582	Accordingly, the Commission directs that the ERO, through the Reliability Standards development process, address ISO-NE's concern. 579. ISO-NE states that Requirement R2 essentially requires the same actions covered by ISO-NE Operating Procedure No. 4. ISO-NE is concerned that a strict approach to auditing compliance with the Reliability Standard could result in a finding that ISO-NE was in violation of the Reliability Standard if it skipped a particular action under its emergency plan even though that action was not called for under ISO-NE procedures. ISO-NE requests that the Commission direct NERC to clarify that a system operator has discretion not to implement every action specified in its capacity and energy emergency plans when other appropriate actions are possible.	77.21%	EOP-002-3	NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION FOR THIS PORTION OF PARAGRAPH 582. MODIFIED MEASURE M5 PER COMMENTERS SUGGESTIONS.
582	Further, we direct the ERO to consider adding Measures and Levels of Non-Compliance in the Reliability Standard.		EOP-002-3	MODIFIED MEASURE M5 PER COMMENTERS SUGGESTIONS.
573	Accordingly, the Commission directs the ERO to modify the Reliability Standard to include all technically feasible resource options in the management of emergencies. These options should include generation resources, demand response resources and other technologies that meet comparable technical performance requirements.	62.28%	EOP-002-3	WITHDRAWN FROM BALLOT

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
601	<p>We also note that APPA raise(s) issues regarding coordination of trip settings and automatic and manual load shedding plans. The Commission directs the ERO to consider these comments in future modification to the Reliability Standard through the Reliability Standards development process.</p> <p>598 In addition, APPA states that NERC should consider requiring balancing authorities and transmission operators to expand coordination and planning of their automatic and manual load shedding plans to include their respective Regional Entities, reliability coordinators and generation owners.</p>	36.13%	EOP-003-2	WITHDRAWN FROM BALLOT
603	<p>In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to EOP-003-1 through the Reliability Standards development process that requires periodic drills of simulated load shedding.</p>	14.86%	EOP-003-2	WITHDRAWN FROM BALLOT
612	<p>APPAs is concerned that generator operators and LSEs may be unable to promptly analyze disturbances, particularly those disturbances that may have originated outside of their systems, as they may have neither the data nor the tools required for such analysis. The Commission understands APPAs concern and believes that, at a minimum, generator operators and LSEs should analyze the performance of their equipment and provide the data and information on their equipment to assist others with their analyses. The Commission directs the ERO to consider this concern in future revisions to the Reliability Standard through the Reliability Standards development process.</p>	55.97%	EOP-004-2	WITHDRAWN FROM BALLOT

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
615	<p>The Commission declines to address Xcel’s concerns about the current WECC process. These issues should be addressed in the Reliability Standards development process or submitted as a regional difference. The Commission directs the ERO to consider all comments in future modifications of the Reliability Standard through the Reliability Standards development process.</p> <p>608. Xcel expresses concern regarding what constitutes a reportable event for each applicable entity and recommends that the Reliability Standard be revised to define what a reportable event is for each entity that has reporting obligations. Further, Xcel states that the requirement in Requirement R3.4 for a final report within 60 days may not be feasible given the current WECC process, which among other things, requires the creation of a group to prepare the report and a 30-day posting of a draft report before it becomes final. Xcel also states that if the ultimate purpose of the report is to provide information to avoid a recurrence of a system disturbance, then the Reliability Standard should be revised to require the distribution of the report to similarly situated entities.</p>	65.98%	EOP-004-2	WITHDRAWN FROM BALLOT
693	<p>In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to FAC-002-0 through the Reliability Standards development process that amends Requirement R1.4 to require evaluation of system performance under both normal and contingency conditions by referencing TPL-001 through TPL-003.</p>	81.60%	FAC-002-1	NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
1249	<p>The Commission also directs the ERO to modify the Reliability Standard to require reporting of temperature and humidity along with peak load because actual load must be weather normalized for meaningful comparison with forecasted values. In response to MidAmerican’s observation that it sees little value in collecting this data, we believe that collecting it will allow all load data to be weather-normalized, which will provide greater confidence when comparing data accuracy, which ultimately will enhance reliability. As a result, we reject Xcel’s proposal that the standard be revised to include only the generic term “peak producing weather conditions” because it is too generic for a mandatory Reliability Standard.</p>	33.23%	MOD-017-1	WITHDRAWN FROM BALLOT
1250	<p>We also reject Alcoa’s proposal that the reporting of temperature and humidity along with peak loads should apply only to load that varies with temperature and humidity because it essentially is a request for an exemption from the requirements of the Reliability Standard and should therefore be directed to the ERO as part of the Reliability Standards development process. We agree, however, with APPA that certain types of load are not sensitive to temperature and humidity. We therefore find that the ERO should address Alcoa’s concerns in its Reliability Standards development process.</p>	33.20%	MOD-017-1	WITHDRAWN FROM BALLOT
1251	<p>The Commission adopts the NOPR proposal directing the ERO to modify the Reliability Standard to require reporting of the accuracy, error and bias of load forecasts compared to actual loads with due regard to temperature and humidity variations. This requirement will measure the closeness of the load forecast to the actual value. We understand that load forecasting is a primary factor in achieving Reliable Operation. Underestimating load growth can result in insufficient or inadequate generation and transmission facilities, causing unreliability in real-time operations. Measuring the accuracy, error and bias of load forecasts is important information for system planners to include in their studies, and also improves</p>	35.22%	MOD-017-1	WITHDRAWN FROM BALLOT

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
	load forecasts themselves.			
1252	The Commission agrees with APPA that accuracy, error and bias of load forecasts alone will not increase the reliability of load forecasts, and, as a result, will not affect system reliability. Understanding of the differences without action based on that understanding would not change anything. Therefore, we direct the ERO to add a Requirement that addresses correcting forecasts based on prior inaccuracies, errors and bias.	38.16%	MOD-017-1	WITHDRAWN FROM BALLOT
1255	We agree with FirstEnergy that transmission planners should be added as reporting entities, and direct the ERO to modify the standard accordingly. We agree that in the NERC Functional Model, the transmission planner is responsible for collecting system modeling data including actual and forecast demands to evaluate transmission expansion plans.	66.48%	MOD-017-1	WITHDRAWN FROM BALLOT
1276	The Commission adopts the NOPR proposal directing the ERO to modify this standard to require reporting of the accuracy, error and bias of controllable load forecasts. This requirement will enable planners to get a more reliable picture of the amount of controllable load that is actually available, therefore allowing planners to conduct more accurate system reliability assessments. The Commission finds that controllable load can be as reliable as other resources, and therefore should also be subject to the same reporting requirements. Although we recognize that verifying load control devices and interruptible loads may be complex, we do not believe that it is overly so. Further, we believe that the ERO, through its Reliability Standards development process can develop innovative solutions to the Commission's concern.	47.00%	MOD-019-1	WITHDRAWN FROM BALLOT

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
1277	We direct the ERO to include APPA’s proposal in the Reliability Standards development process to add a new requirement to MOD-019-0 that would oblige resource planners to analyze differences between actual and forecasted demands for the five years of actual controllable load and identify what corrective actions should be taken to improve controllable load forecasting for the 10-year planning horizon.	34.53%	MOD-019-1	WITHDRAWN FROM BALLOT
1287	We adopt the proposal to direct the addition of a requirement for reporting of the accuracy, error and bias of controllable load forecasts because we believe that reporting of this information will provide applicable entities with advanced knowledge about the exact amount of available controllable load, which will improve the accuracy of system reliability assessments. The Commission finds that controllable load in some cases may be as reliable as other resources and therefore must also be subject to the same reporting requirements. We recognize that determining the precise availability and capability of direct load control is a difficult management and customer relations exercise, but we do not believe that it will be overly so. Further, we believe that the ERO, through its Reliability Standards development process can develop innovative solutions to the Commission’s concern.	53.58%	MOD-020-1	WITHDRAWN FROM BALLOT
1300	The Commission directs the ERO to modify the title and purpose statement to remove the word “controllable.” We note that no commenter disagrees.	92.94%	MOD-021-1	NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION
1469	Further, as the ERO reviews this Reliability Standard in its five-year cycle of review, the Regional Entity, rather the regional reliability organization, should develop the procedures for corrective action plans.	52.23%	PRC-004-2	REFERENCES TO RRO IN R3 AND M3 CORRECTED. LSE AND TOP HAVE BEEN REMOVED. OTHERWISE, NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION.
1469	We direct the ERO to consider ISO-NE’s suggestion that LSEs and transmission operators should be included in the applicability section, in the Reliability Standards development process as it modifies PRC-004-1.		PRC-004-2	THESE CHANGES REMOVED FROM THE STANDARD. LSE AND TOP HAVE BEEN REMOVED.

Initial Ballot Results — Project 2010-12: Order 693 Directives

Paragraph	Directive Language	Weighted Segment Approval	Standard No.	RESPONSE TEAM COMMENTS
1858	The Commission directs the ERO to address the reactive power requirements for LSEs on a comparable basis with purchasing-selling entities.	69.22%	VAR-001-2	NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION
1879	The Commission noted in the NOPR that in many cases, load response and demand-side investment can reduce the need for reactive power capability in the system. Based on this assertion, the Commission proposed to direct the ERO to include controllable load among the reactive resources to satisfy reactive requirements for incorporation into Reliability Standard VAR-001-1.	64.35%	VAR-001-2	LOAD SHEDDING REMOVED FROM R2, R5, AND R9.
1879	<p>While we affirm this requirement, we expect the ERO to consider the comments of SoCal Edison with regard to reliability and SMA in its process for developing the technical capability requirements for using controllable load as a reactive resource in the applicable Reliability Standards.</p> <p>SMA notes that its members’ facilities often include significant capacitor banks, and further, reducing load can reduce local reactive requirements.</p> <p>1878. SoCal Edison suggests caution regarding the Commission’s proposal to include controllable load as a reactive resource. It agrees that, when load is reduced, voltage will increase and for that reason controllable load can lessen the need for reactive power. However, SoCal Edison believes that controllable load is typically an energy product and there are other impacts not considered by the Commission’s proposal to include controllable load as a reactive resource. For example, activating controllable load for system voltage control lessens system demand, requiring generation to be backed down. It is not clear to SoCal Edison whether any consideration has been given to the potential reliability or commercial impacts of the Commission’s proposal.</p>		VAR-001-2 (No changes to standard)	LOAD SHEDDING REMOVED FROM R2, R5, AND R9. OTHERWISE, NO CHANGE FROM PREVIOUSLY BALLOTTED VERSION – RESPONSE TEAM BELIEVES NO CHANGES ARE NEEDED TO ADDRESS SOCIAL EDISON AND SMA COMMENTS