

Comments Received Report

Survey Details

Name 2015-04 Alignment of Glossary Terms & Definitions SAR

Description

Start Date 3/13/2015

End Date 4/14/2015

The Industry Segments are:

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

Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
ACES Power Marketing	6		ACES Standards Collaborators	Amber Skillern	East Kentucky Power Cooperative	SERC	1,3,5
				Ginger Mercier	Prairie Power, Inc.	SERC	3
				Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
				Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
				Bill Watson	Old Dominion Electric Cooperative	RFC	3,4
				Chip Koloini	Golden Spread Electric Cooperative	SPP	3,5
				Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
				Mohan Sachdeva	Buckeye Power, Inc.	RFC	3,4,5
				Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Dominion - Dominion Resources, Inc.	6		Dominion NCP	Mike Garton	NERC Compliance Policy	NPCC	5,6
				Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
				Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
				Louis Slade	NERC Compliance Policy	RFC	5,6
Independent Electricity System Operator	2	NPCC	ISO/RTO Council Standards Review Committee	Charles Yeung	SPP	SPP	2
				Christina Bigelow	ERCOT	TRE	
				Mark Holman	PJM	RFC	
				Greg Campoli	NYISO	NPCC	
				Ali Miremadi	CAISO	WECC	
				Ben Li	IESO	NPCC	
				Kathleen Goodman	ISO-NE	NPCC	

Duke Energy	1,3,5,6	FRCC,SERC,RFC	Mike Lowman on Behalf of Duke Energy	Doug Hills	Duke Energy	RFC	1
				Lee Schuster		FRCC	3
				Dale Goodwine		SERC	5
				Greg Cecil		RFC	6
MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
				Amy Casucelli	Xcel Energy		1,3,5,6
				Chuck Lawrence	American Transmission Company		1
				Chuck Wicklund	Otter Tail Power Company		1,3,5
				Dan Inman	Minnkota Power Cooperative, Inc		1,3,5,6
				Dave Rudolph	Basin Electric Power Cooperative		1,3,5,6
				Kayleigh Wilkerson	Lincoln Electric System		1,3,5,6
				Jodi Jenson	Western Area Power Administration		1,6
				Larry Heckert	Alliant Energy		4
				Mahmood Safi	Omaha Public Utility District		1,3,5,6
				Marie Knox	Midwest ISO Inc.		2
				Mike Brytowski	Great River Energy		1,3,5,6
				Randi Nyholm	Minnesota Power		1,5
				Scott Nickels	Rochester Public Utilities		4
				Terry Harbour	MidAmerican Energy Company		1,3,5,6
				Tom Breene	Wisconsin Public Service Corporation		3,4,5,6
Tony Eddleman	Nebraska Public Power District	1,3,5					
Northeast Power Coordinating Council	10	NPCC	NPCC--RSC--2014-04	Alan Adamson	New York State Reliability Council, LLC	NPCC	10

			David Burke	Orange and Rockland Utilities Inc.		3
			Greg Campoli	New York Independent System Operator		2
			Sylvain Clermont	Hydro-Quebec TransEnergie		1
			Kelly Dash	Consolidated Edison Co. of New York, Inc.		1
			Gerry Dunbar	Northeast Power Coordinating Council		10
			Kathleen Goodman	ISO - New England		2
			Mark Kenny	Northeast Utilities		1
			Helen Lainis	Independent Electricity System Operator		2
			Alan MacNaughton	New Brunswick Power Corporation		9
			Paul Malozewski	Hydro One Networks Inc.		1
			Bruce Metruck	New York Power Authority		6
			Lee Pedowicz	Northeast Power Coordinating Council		10
			Robert Pellegrini	The United Illuminating Company		1
			Si Truc Phan	Hydro-Quebec TransEnergie		1
			David Ramkalawan	Ontario Power Generation, Inc.		5
			Brian Robinson	Utility Services		8
			Wayne Sipperly	New York Power Authority		5

				Ben Wu	Orange and Rockland Utilities Inc.		1
				Peter Yost	Consolidated Edison Co. of New York, Inc.		3
				Michael Jones	National Grid		1
				Brian Shanahan	National Grid		1
				Connie Lowe	Dominion Resources Services, Inc.		5
				Silvia Parada Mitchell	NextEra Energy, LLC		5
Public Service Enterprise Group	1,3,5,6	NPCC,RFC	PSEG	Tim Kucey	PSEG - PSEG Fossil LLC	RFC	5
				Stephen York	PSEG - Energy Resources and Trade LLC		6
				Joseph Smith	PSEG - Public Service Electric and Gas Co.		1
				Jeffrey Mueller	PSEG - Public Service Electric and Gas Co		3
Southern Company - Southern Company Services, Inc.	1,3,5,6	SERC	Southern Company	Robert Schaffeld	Southern Company Services, Inc..	SERC	1
				John Ciza	Southern Company Generation and Energy Marketing		6
				R. Scott Moore	Alabama Power Company		3
				William Shultz	Southern Company Generation		5
Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	SPP	2
				Laura Cox	Westar Energy Inc		1,3,5,6
				Stephanie Johnson	Westar Energy Inc		1,3,5,6
				Bo Jones	Westar Energy Inc		1,3,5,6
				Tiffany Lake	Westar Energy Inc		1,3,5,6

				kevin Giles	Westar Energy Inc		1,3,5,6
				James Nail	City of Independence, Missouri		3,5
				Ellen Watkins	Sunflower Electric Power Corporation		1
				Jason Smith	Southwest Power Pool Inc		2
				Megan Wagner	Westar Energy Inc		1,3,5,6
				Luis Zaragoza	Sunflower Electric Power Corporation		1
				J.Scott Williams	City Utilities of Springfield		1,4

Survey Questions

See the Unofficial Comment Form on the [Project Page](#) for additional background information.

If you would like to bypass taking the survey, scroll down to submit.

This will allow you to view Social Survey and agree/disagree with an already posted comment using the "thumbs up/thumbs down" feature.

Submitting a "thumbs up/thumbs down" on another entity's comment enables a negative vote to count in the calculation of consensus.

I want to bypass taking the survey.

I want to bypass taking the survey.

1. The SAR provides that the “Industry Need” for the project is as follows:

“There are defined terms that appear in both the NERC Glossary of Terms and Rules of Procedure (“cross-over terms”) that are inconsistent in substance and form. This causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and Rules of Procedure.”

Do you agree with the stated “Industry Need” as outlined in the SAR? If not, please identify what you believe the proper statement of “Industry Need” to be.

Yes

No

2. The SAR provides that the purpose of the project is,

“to align the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”

Do you agree with the purpose statement for the project? If not, please explain the basis for your disagreement and provide a recommended purpose statement for the project.

Yes

No

3. The SAR identifies two goals for the project as follows:

Goal 1: For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP.

Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with the stated goals for the project? If not, please identify which goal(s) you do not agree with and provide a detailed description of your recommended goals for the project.

Yes

No

4. The stated objectives for the project are as follows:

1. For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

2. For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

3. For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with these stated objectives? If you do not agree, please explain the basis for your disagreement and provide a detailed description of your recommended objectives for the project.

Yes

No

5. The “Detailed Description” section of the SAR provides a non-exhaustive, illustrative listing of the types of work that will be undertaken by the drafting team. Do you agree with the “Detailed Description” section of the SAR? If you do

not agree with the description of the work that will be undertaken by the drafting team, please state the basis for your disagreement and provide a detailed description of what work you believe should be undertaken.

Yes

No

6. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:

Yes

No

Responses By Question

See the *Unofficial Comment Form* on the [Project Page](#) for additional background information.

Jeremy Voll - Basin Electric Power Cooperative - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Oliver Burke - Entergy - Entergy Services, Inc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Christy Koncz - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Bee - Exelon - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

If you would like to bypass taking the survey, scroll down to submit.

This will allow you to view Social Survey and agree/disagree with an already posted comment using the "thumbs up/thumbs down" feature.

Submitting a "thumbs up/thumbs down" on another entity's comment enables a negative vote to count in the calculation of consensus.

I want to bypass taking the survey.

Jeremy Voll - Basin Electric Power Cooperative - 3 -

Selected Answer: I want to bypass taking the survey.

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: I want to bypass taking the survey.

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer: I want to bypass taking the survey.

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Oliver Burke - Entergy - Entergy Services, Inc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrew Puztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Christy Koncz - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: I want to bypass taking the survey.

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Bee - Exelon - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer: I want to bypass taking the survey.

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: No

Answer Comment:

- If changes are NOT necessary to align the terms or if the differences are appropriate, NERC could modify the words or phrases in the ROP in a way to show that it is not the exact term as in the NERC Glossary.
- Make changes in the ROP and not in the NERC Glossary.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Regarding Goal 1, what would happen if the ROP changes receive different comments than the standards posting? These are two separate processes, and it may be necessary to consider a streamlined process to make consistent language changes between the NERC Glossary and the Rules of Procedure. If there is a new process introduced in this project, it could be used if any misaligned terms are identified in the future.

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Duke Energy suggests adding to the scope of the project those definitions within the NERC standards, Standard only definitions, that are inconsistent with the NERC Glossary of Term or Rules of Procedure (ROP). This would reduce the amount confusion within the industry if those identified defintions are consistent with the NERC Glossary of Terms and the ROP.

Document Name:

Likes: 0

Dislikes: 0

Christy Koncz - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:
See attached document under Q1

Document Name: Q3.doc

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer: No

Answer Comment:

Tacoma Power recommends the following modification to Goal 1: "For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative. Where necessary, revisions to align the terms will be addressed as part of a subsequent revision to the SAR." Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.

Tacoma Power recommends the following modification to Goal 2: "Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned and to define a process for how future identified inconsistencies are handled." The revised verbiage would address cases that might be overlooked by Project 2015-04.

Document Name:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Please refer to the SRC comment provided under Question 2.

Document Name:

Likes: 0

Dislikes: 0

John Bee - Exelon - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

4. The stated objectives for the project are as follows:

- 1. For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the**

defined term(s) for industry approval.

2. For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

3. For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with these stated objectives? If you do not agree, please explain the basis for your disagreement and provide a detailed description of your recommended objectives for the project.

Jeremy Voll - Basin Electric Power Cooperative - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Please see proposed additional scope under Q6.

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: No

Answer Comment:

The phrases "where necessary, make revisions to align the terms" in Goal 1 and "if the differences are appropriate" in the objectives for Goal 1 both infer that there may be instances when inconsistent terms would be appropriate. Could the drafting team provide some scenarios to illustrate why inconsistencies would, in some cases, be acceptable?

Document Name:

Likes: 0

Dislikes: 0

Oliver Burke - Entergy - Entergy Services, Inc. - 1 -

Selected Answer: Yes

Answer Comment:

See note to Question 3, which could be considered a 4th goal of this SAR/development effort.

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer: Yes

Answer Comment:

Clarifying Comment regarding Item #2 For Goal 1 above : States ” *For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved,.....*”

ATC questions whether the SDT possibly have inserted a gap by referring to “board approved” which should be stated more correctly as “*Reliability Standards that have been approved by FERC and currently enforced*” , as part of the SAR Objectives. *This project should be evaluating the impact that any changes to the defined terms may have on the existing Standards and ATC recommends the objective be revised to address this potential gap.*

Document Name:

Likes: 0

Dislikes: 0

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Items 1 and 2 can be combined to read:

1. **For Goal 1:** For existing cross-over terms, and cross-over terms that are currently under revision, board approved, or pending regulatory approval that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

Document Name:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

We agree with the objectives as written.

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Duke Energy suggests adding the following revisions for Goal 2:

“3. For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) , if any, to allow for future development of defined terms that are consistent and aligned or propose such a process if one does not exist.”

We believe the scope of the project for Goal 2 should be to not only revises current processes, but also to develop any additional process(es) necessary regarding changes or improvements to existing and future NERC defined terms.

If our recommendation to review standard definitions is accepted, Duke Energy suggests the following revisions to Goal 1:

“1. For Goal 1: For existing cross-over terms that are inconsistent, either within a standard or in the NERC Glossary of Terms, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

2. For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, , either within a standard or

in the NERC Glossary of Terms, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.”

Document Name:

Likes: 0

Dislikes: 0

Christy Koncz - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:
We agree with the objectives, provided that the substance of our comments in questions 1, 2, and 3 are adopted.

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Please see proposed wording in **bold**:

For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes **to such terms** are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes **to such definitions** are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer: No

Answer Comment:

Tacoma Power recommends the following modification to the first objective: "Identify existing cross-over terms that are inconsistent and evaluate whether changes are

necessary to align the terms or if the differences are appropriate. If changes are appropriate, seek industry approval to revise the SAR to authorize revisions to the identified defined term(s).” Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.

Tacoma Power recommends the following modification to the second objective: “Identify cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval and evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, seek industry approval to revise the SAR to authorize revisions to the defined term(s).” Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.

Tacoma Power recommends the following modification to the third objective: “Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned and to define a process for how future identified inconsistencies are handled.” The revised verbiage would address cases that might be overlooked by Project 2015-04.

Document Name:

Likes:

0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment: For Goal 2, please refer to the comments to Questions (2) and (3).

Document Name:

Likes: 0

Dislikes: 0

John Bee - Exelon - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

will be undertaken by the drafting team. Do you agree with the "Detailed Description" section of the SAR? If you do not agree with the description of the work that will be undertaken by the drafting team, please state the basis for your disagreement and provide a detailed description of what work you believe should be undertaken.

Jeremy Voll - Basin Electric Power Cooperative - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Please see proposed additional scope under Q6.

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Oliver Burke - Entergy - Entergy Services, Inc. - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrew Puztai - American Transmission Company, LLC - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: No

Answer Comment:

- If changes are NOT necessary to align the terms or if the differences are appropriate, NERC could modify the words or phrases in the ROP in a way to show that it is not the exact term as in the NERC Glossary.
- Make changes in the ROP and not in the NERC Glossary.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

The impact of Paragraph 81 must be considered.

Document Name:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer: No

Answer Comment:

Coordination with the terms in the functional model documents should be undertaken in conjunction with this effort.

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

The examples listed were appropriate terms to align. In addition to already defined NERC standards, it would be helpful for the drafting team to develop or make recommendations to develop future definitions for certain NERC Glossary Terms, such as but not limited to "Generator Interconnection" or "Systematic Approach to Training." If such definitions were developed, a careful review of their use in the existing standards and their impact would be needed to ensure the definitions only

offer clarity and do not modify the standard.

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Christy Koncz - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

See attached document under Q1

Document Name: Q5.doc

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer: No

Answer Comment:

Please refer to Tacoma Power's comments on Questions 2-4. Specifically, Tacoma

Power believes the Detailed Description should include a complete list of identified cross-over terms that are inconsistent and that require changes to align the terms. This would require a two-step process. The first step would be identification. The second step would be authorization to proceed with proposing revisions. The basis for suggesting this two-step approach is that the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.

Document Name:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

The SAR discusses reviews regarding consistency between defined terms that are capitalized and similar terms that are not, the SRC respectfully requests that the SDT take the totality of the potential impacts to standards into consideration when proposing modiciatins to defined terms and/or lower-cased terms. If such changes are not thoroughly evaluated for all potential impacts, unintended consequences may result. As depicted in the Standards Process Manual, all new or revised definitions must go through the same vetting process as new/revised standards, i.e., they need to be posted for comment then balloted.

Document Name:

Likes: 0

Dislikes: 0

John Bee - Exelon - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

6. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:

Jeremy Voll - Basin Electric Power Cooperative - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

We agree with all of the above, but believe that the scope of this project falls a bit short of ensuring consistency of terms across all important documents that form the basis for Reliability Standards development. The Functional Model, though not required to be approved by regulatory authorities, provides the framework for the development and applicability of NERC's Reliability Standards. We therefore suggest that the purpose statement, scope of work, goals and detail description of work be expanded to include reviewing terms defined in the Functional Model, and ensuring consistency across the Glossary, ROP and Functional Model.

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: Yes

Answer Comment:

In addition to the potential inconsistencies identified in NERC's glossary and ROP, there are many other inconsistencies between the terms used by NERC and the RTOs. Though we realize this the scope of project is limited to the terms used solely within NERC, we also believe there is a need to examine and ensure the consistency of terms between NERC and the RTOs.

Document Name:

Likes: 0

Dislikes: 0

Oliver Burke - Entergy - Entergy Services, Inc. - 1 -

Selected Answer: Yes

Answer Comment:

Registered entities must be able to depend on the published definitions for terms used in reliability standards. One important step in that direction would be to avoid re-defining Glossary terms once they are entered into the Glossary the first time. If that is not possible, a new term could be coined, possibly. If a term *must* be redefined, then every requirement in every standard that uses that term (or a derivative term*) should be put up for ballot again.

* Example: “Adverse Reliability Impact” has two defined terms in its definition in the Glossary: “Bulk Electric System” and “Cascading”.

Adverse Reliability Impact : 8/4/2011, The impact of an event that results in **Bulk Electric System** instability or **Cascading**.

Bulk Electric System²: Unless modified by the lists shown below, all **Transmission Elements** operated at 100 kV or higher and **Real Power** and **Reactive Power** resources connected at 100 kV or higher. This does not include facilities used in the local distribution of electric energy. Inclusions: - I1 - Transformers with the primary terminal and at least one secondary terminal operated at 100 kV or higher unless excluded under Exclusion E1 or E3. - I2 - Generating resource(s) with gross individual nameplate rating greater than 20 MVA or gross plant/facility aggregate nameplate rating greater than 75 MVA including the generator terminals through the high-side of the step-up transformer(s) connected at a voltage of 100 kV or above. - I3 - **Blackstart Resources** identified in the **Transmission Operator’s** restoration plan. - I4 - Dispersed power producing resources with aggregate capacity greater than 75 MVA (gross aggregate nameplate rating) utilizing a system designed primarily for aggregating capacity, connected at a common point at a voltage of 100 kV or above. [The remainder of this definition was truncated, as this is only for illustrative purposes.]

Cascading: 2/8/2005, 3/16/2007: The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.

If this definition of “Cascading” was changed, then every standard that references “Cascading” and every standard which references “Adverse Reliability Impact” should be rebaloted with the new definition.

Also, NERC should consider whether it is possible to adopt a new policy for updating the Glossary to require that new or revised definitions must avoid using Glossary-defined terms as part of the definitions of other Glossary terms. This could limit the confusion going forward. Some usage of defined terms will be unavoidable (such as BES), but others may be possible to avoid.

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrew Puztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Page 1 - SAR Requestor Information; Dominion suggests adding the SAR DT chair name and the NERC staffers name behind their phone numbers, for completeness.

Dominion does not agree with "N/A" in column labeled "Standard No." in the box labeled "Related Standards" (page 6 of the SAR). We would prefer it indicate "as applicable" with the explanation "as applies to standards that contain terms defined in the NERC Glossary of Terms".

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Any effort to line up the NERC Glossary of Terms which are used in Standards, with the Rules of Procedure definitions should include an effort to at least identify inconsistencies with terms found in the NERC Functional Model Version 6 and notify the Functional Model Advisory Group of any such inconsistencies.

On page 1 in the SAR Requester Information section suggest adding the SAR Drafting Team chair's name and the NERC Staffer's name behind their phone numbers for completeness.

In the section labeled "Related Standards" on page 6 of the SAR suggest replacing the "N/A" in the column entitled "Standard No." with "as applicable". The concomitant entry in the Explanation column to be added would be "as applies to standards that contain terms defined in the NERC Glossary of Terms".

The NERC *Glossary of Terms* are voted on by industry, approved by the NERC BOT, and approved by FERC. The NERC RoP changes are only adopted by the NERC BOT (with input from the MRC), and are approved by FERC. Also, the NERC *Glossary of Terms* applies to NERC Reliability Standards. These standards are auditable, enforceable and sanctionable. The NERC RoP and Functional Model have other purposes, outside of compliance (i.e., the RoP contains administrative and governance procedures and the Functional Model is for registration purposes). A "Conflicts" clause that makes one agreement or document takes precedence over all others in a conflict should be added. Suggest the following:

"The NERC *Glossary of Terms* shall apply and have precedence when interpreting the meaning of terms used in NERC Reliability Standards. Definitions of terms in the NERC RoP and Functional Model documents, which may or may not be in agreement or conflict, shall only be used to clarify the meaning of terms used in the RoP and Functional Model documents, and shall not have precedence over the NERC *Glossary of Terms* in matters of Reliability Standard interpretations, compliance audits, enforcement or in the development of sanctions. Deference and precedence should be given to the NERC *Glossary of Terms* in interpreting the definition of terms used in all NERC documents."

OR

"In the event of a conflict between the definition of terms cited in the NERC Glossary of Terms, the definition used in a single reliability standard, or the definition provided in any other NERC document (e.g., RoP, Functional Model), the following order of precedence shall apply:

1. The NERC Glossary of Terms definitions shall apply, unless superseded or modified by a Single Standard definition presented at the beginning of the standard under the Definition of Terms heading.

2. A Single Standard definition presented at the beginning of the standard under the Definition of Terms heading shall only apply for that one reliability standard.

3. Footnote, Rationale Box and Guidance Document definitions shall take precedence only if there are no NERC Glossary of Terms or Single Standard definitions.

4. Definitions of terms presented in other NERC documents (e.g., RoP, Functional Model, RSAW's) will have no standing in the presence of the NERC Glossary of Terms, Single Standard definitions or standard Footnote, Rationale Box and Guidance Document definitions. They shall only apply where the drafting history of the standard clearly supports and shows the intent of the standard drafting team and the industry balloting to support their application to the single standard.

5. Definitions contained in approved interpretations of standards, which are appended to the original standard, are incorporated into the standard and shall therefore assume the same level of precedence as any Single Standard definition.”

Document Name:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

We agree with the direction that the drafting team is taking to address inconsistencies in the NERC Glossary. We ask that the team consider CIP definitions in addition to the Operations and Planning standards to ensure consistency throughout all NERC terms.

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Christy Koncz - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:
No additional comments

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:
Comparing the NERC Glossary to the information listed in the Rules of Procedure is a good idea.

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Our only other comment with the SAR is that it contains lengthy redundant wording.

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

We would suggest to the drafting team to take into consideration and adding the term(s) 'Contingency Reserves', 'System Operating Limit-SOL' and 'Interconnection Reliability Operating Limit-IROL' to the list of 'cross-over' terms to be evaluated in your process. It is our concern that these specific terms are used in various Reliability Standards and the interpretation of each has caused confusion in the industry.

Document Name:

Likes: 0

Dislikes: 0

Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

The SRC recommends clarifying the scope of the SAR to ensure consistency of terms across all important documents that form the basis for Reliability Standards development. In particular, the Functional Model, which is captured in Appendix 5 to

the ROP, also exists outside of the ROP. As it provides the framework for the development and applicability of NERC's Reliability Standards, the SRC suggests that the purpose statement, scope of work, goals and detail description of work clarify whether the SDT is intending to include reviewing terms defined in the Functional Model, and ensuring consistency across the Glossary, ROP and Functional Model.

Document Name:

Likes: 0

Dislikes: 0

John Bee - Exelon - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Additional Comments

**Public Service Enterprise Group
Christy Koncz**

Comments to Question 1

See the suggested redline below:

“There are defined terms that appear in both the NERC Glossary of Terms and and Appendix 2 of the Rules of Procedure ~~“(cross-over terms”)~~ that are intended to be the same ~~inconsistent~~ in substance and form “(cross-over terms”). (Appendix 2 definitions that are

intended to be the same as NERC Glossary terms marked with **.) ThisDifferences in such terms may causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and Appendix 2 of the Rules of Procedure.”

By the changes above, PSEG would be changing the SAR so that definitional alignment would only be undertaken for terms in Appendix 2 that are intended to be the same a NERC Glossary terms. Such terms are denoted in Appendix 2 with **, as explained on p.1 of Appendix 2:

“Definitions of terms in this Appendix that are marked with asterisks (**) are taken from the NERC Glossary of Terms Used in Reliability Standards.”

The “Industry Need” redline above would remove the terms “Net Energy for Load,” “Generator Owner” and “Generator Operator” (and any other Appendix 2 terms without **) from the scope of this SAR. If the team decides to pursue intentional definitional differences, it should consider doing so in a second phase of this project under a separate SAR. See additional comments on this topic in the PSEG response to question 5.

Comments to Question 2

PSEG recommends the following redline changes, which are consistent with its response to question 1.

“to align the cross-over terms defined terms found in the NERC Glossary of Terms (Glossary) and Appendix 2 of the Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”

Comments to Question 3

To ensure that only Appendix 2 definitions are addressed, PSEG recommends this redline change to Goal 1:

Goal 1: For cross-over terms in the Glossary and ROP Appendix 2, identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP.

Comments to Question 5

Intentional differences may exist between identical terms defined in Appendix 2 and the NERC Glossary. Differences are assumed to be intentional if the Appendix 2 definition does not have the ** mark which indicates it is taken from the NERC Glossary.

Goal 2's objective (identifying process improvements "to allow for future development of defined terms that are consistent and aligned") cannot be achieved if definitional differences are intentional.

If the team decides to pursue intentional definitional differences, it should consider doing so in a second phase of this project under a separate SAR. For phase 2, the project team should prepare a list of all Appendix 2 terms *not* marked with a ** and NERC Glossary terms which are identical in name but which are defined differently. This list should then be provided to NERC since they prepare ROP filings. NERC Legal could serve as a point of contact. If NERC desires a change in a NERC Glossary term, they should provide the particulars that support the NERC Glossary term change to the project team for its action.

Two examples of Appendix 2 definitions that are intentionally different from their NERC Glossary counterparts are discussed below.

- The two sentences in the "Detailed Description" section of the SAR that discuss the "Net Energy for Load" (NEL) definition should be deleted. NEL is used in ROP Section 1100 – Annual NERC Business Plans and Budgets to allocate NERC and Regional Costs to Load-Serving Entities.
- The last paragraph in the "Detailed Description" section of the SAR that addresses Generator Owner and Generator Operator should be deleted. In the Risk-Based Registration proceeding in Docket No. 15-4-000, FERC approved changes to the Appendix 2 definitions of Generator Owner and Generator Operator. In that same proceeding, NERC made changes in Appendix 5A - Organization Registration and Certification Manual. The "before" and "after" language from Section II of Appendix 5A is shown below.

Before:

Organization Registration — Entities Required to Register

All industry participants responsible for one or more of the functions below must register for each function through the Organization Registration Program. These entities are defined in the Glossary of Terms with responsibilities designated by the individual Reliability Standards and the NERC *Statement of Compliance Registry Criteria* document.

After:

Organization Registration — Entities Required to Register

All industry participants responsible for one or more of the functions below must register for each function through the Organization Registration Program. These entities are defined in the NERC *Statement of Compliance Registry Criteria*.

Prior to the change to Appendix 5A, NERC Glossary Terms were used for registration functions; however, after the change, this linkage no longer exists.

NERC stated the following in its January 26, 2015 comments in RR15-4-000 (at 6):

“NERC further notes that there is no basis in Commission precedent for the PSEG Companies’ argument that definitions in the NERC Glossary and the NERC Statement of Compliance Registry Criteria and Appendix 2 must be identical. In fact, the Commission has approved amendments to the Rules of Procedure with those sections retaining their respective terms. There is no need for the Commission to address or resolve this matter in the instant docket.²⁴”

²⁴ See e.g., Project 2015-04 Alignment of NERC Glossary of Terms and Definitions Used in “the Rules of Procedure (Appendix 2 of the Rules of Procedure).

SPP

Charles Yeung

1. The SAR provides that the “Industry Need” for the project is as follows:

“There are defined terms that appear in both the NERC Glossary of Terms and Rules of Procedure (“cross-over terms”) that are inconsistent in substance and form. This causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and Rules of Procedure.”

Do you agree with the stated “Industry Need” as outlined in the SAR? If not, please identify what you believe the proper statement of “Industry Need” to be.

Yes

No

Comments:

2. The SAR provides that the purpose of the project is,

“to align the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”

Do you agree with the purpose statement for the project? If not, please explain the basis for your disagreement and provide a recommended purpose statement for the project.

Yes

No

Comments: The SAR is unclear regarding what process(es) the SDT is evaluating. To the extent that this is intended to evaluate or revise formal processes such as the NERC Standards Development Process, such should be indicated. Further, to the extent that this is intended to provide flexibility to develop additional processes (either formal or informal definition development processes), such should be clarified.

3. The SAR identifies two goals for the project as follows:

Goal 1: For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP.

Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with the stated goals for the project? If not, please identify which goal(s) you do not agree with and provide a detailed description of your recommended goals for the project.

Yes

No

Comments: Please refer to the SRC comment provided under Question 2.

4. The stated objectives for the project are as follows:

1. **For Goal 1:** For existing cross-over terms that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.
2. **For Goal 1:** For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.
3. **For Goal 2:** Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with these stated objectives? If you do not agree, please explain the basis for your disagreement and provide a detailed description of your recommended objectives for the project.

Yes

No

Comments: For Goal 2, please refer to the comments to Questions (2) and (3).

5. The “Detailed Description” section of the SAR provides a non-exhaustive, illustrative listing of the types of work that will be undertaken by the drafting team. Do you agree with the “Detailed Description” section of the SAR? If you do not agree with the description of the work

that will be undertaken by the drafting team, please state the basis for your disagreement and provide a detailed description of what work you believe should be undertaken.

Yes

No

The SAR discusses reviews regarding consistency between defined terms that are capitalized and similar terms that are not, the SRC respectfully requests that the SDT take the totality of the potential impacts to standards into consideration when proposing modifications to defined terms and/or lower-cased terms. If such changes are not thoroughly evaluated for all potential impacts, unintended consequences may result. As depicted in the Standards Process Manual, all new or revised definitions must go through the same vetting process as new/revised standards, i.e., they need to be posted for comment then balloted.

6. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:

Yes

No

Comments: The SRC recommends clarifying the scope of the SAR to ensure consistency of terms across all important documents that form the basis for Reliability Standards development. In particular, the Functional Model, which is captured in Appendix 5 to the ROP, also exists outside of the ROP. As it provides the framework for the development and applicability of NERC's Reliability Standards, the SRC suggests that the purpose statement, scope of work, goals and detail description of work clarify whether the SDT is intending to include reviewing terms defined in the Functional Model, and ensuring consistency across the Glossary, ROP and Functional Model.