

Consideration of Comments Term 4: Blackstart Resource

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 4: Blackstart Resource

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 4: Blackstart Resource (redline)

<u>Blackstart Resource</u>: A generating unit(s) and its associated set of equipment which has the ability to be started without support from the System or is designed to remain energized without connection to the remainder of the System, with the ability to energize a bus, meeting the Transmission Operator's restoration plan needs for <u>real-Real</u> and <u>reactive-Reactive power-Power</u> capability, frequency and voltage control, and that has been included in the Transmission Operator's restoration plan.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms "Real Power" and "Reactive Power" because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment					
1	John Fontenot – Bryan Texas Utilities	1		Yes						
SDT	SDT response:									
2	Kathy Caignon – City of Vineland	3		Yes						
SDT	response:									
3	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes						
SDT	<u>response</u> :									
4	Leonard Kula – Independent Electricity System Operator	2		No	We do not agree with the proposed revisions as it fall short of including the Reliability Coordinator. We suggest to add "and Reliability Coordinator's" after each of the					



#	Commenter	Segment	Group name	Y/N	Comment
**	Organization	Segment	Group name	I/IN	Comment
	0.				"Transmission Operator's" since in EOP-006-2, the RC's restoration plan also requires the utilization of Blackstart Resources.
SDT	response: Thank you for you	r comments;	however, your p	roposed	revisions are outside of the permissible scope of work for this project. As outlined in the
the com	drafting team proposed revisi	ing the Glossa by a developm	ary definition to	align wit	ing language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, th the existing definition in the ROP. To the extent you believe the issues identified in your g team encourages you to submit a SAR outlining the issues and your proposed
_	T	T	T	l	
5	Mary Claire Yatsko – Seminole Electric	1,3,4,5,6		Yes	
	Cooperative, Inc.				
SDT	response:				
6	John Seelke –	1,2,5,6	PSEG	Yes	
	PSEG				
SDT	<u>response</u> :				
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:		1		
8	Thomas Foltz – AEP	5		Yes	
SDT	response:				
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:				
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	

Project 2015-04 - Alignment of Terms | Consideration of Comments

Term 4: Blackstart Resource



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#	Commenter Organization	Segment	Group name	Y/N	Comment
SDT	<u>response</u> :				
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
SDT	response:				
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC Project 2015-04	No	We agree with the consistency revisions proposed, but the need to capture the restoration needs and obligations of Reliability Coordinators under EOP-006-2 must be addressed. Suggest that the SDT add "and Reliability Coordinator's" after each of the "Transmission Operator's" to reflect that, in EOP-006-2, the RC's restoration plan also requires the utilization of Blackstart Resources. Also, the second part of the definition pertains to a generating unit that "is designed to remain energized without connection to the remainder of the System." We suggest that the SDT consider deleting this aspect of the definition due to the fact that although such a generating unit could be utilized for system restoration, it would not (indeed, could not) be classified in advance as a Blackstart Resource within the restoration plan (i.e., there is no guarantee that the unit would be operating at the time of the disturbance).
SAR, the c	the drafting team revisions of drafting team proposed revisions.	were limited ting the Glossa by a developm	to alignment of the ary definition to	he <i>exist</i> align wi	d revisions are outside of the permissible scope of work for this project. As outlined in the ing language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the the existing definition in the ROP. To the extent you believe the issues identified in your gream encourages you to submit a SAR outlining the issues and your proposed
15	NiSource - Northern Indiana Public Service Co.	0		res	
SDT	response:				
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	

Term 4: Blackstart Resource



#	Commenter	Segment	Group name	Y/N	Comment					
	Organization									
SDT	SDT response:									
15	Matthew Beilfuss –	3,4,5,6		Yes						
	WEC Energy Group, Inc.									
SDT	response:			•						
16	Dennis Chastain –	1,3,5,6		Yes						
	Tennessee Valley									
	Authority									
SDT	response:									
										
17	Robert Coughlin –	2		No	ISO-NE agrees with the consistency revisions proposed, but respectfully suggests that the					
	On Behalf of: Michael	_			SDT overlooked the need to capture the restoration needs and obligations of Reliability					
	Puscas, ISO New England,				Coordinators under EOP-006-2. Thus, ISO-NE suggests that the SDT add "and Reliability					
	Inc.				Coordinator's" after each of the "Transmission Operator's" to reflect that, in EOP-006-2,					
	iiie.				the RC's restoration plan also requires the utilization of Blackstart Resources.					
					the NC 3 restoration plan also requires the utilization of blackstart nesources.					
					Also, the second part of the definition pertains to a generating unit that "is designed to					
					, , , , , , , , , , , , , , , , , , , ,					
					remain energized without connection to the remainder of the System." ISO-NE suggests					
					that the SDT consider deleting this aspect of the definition due to the fact that although					
					such a generating unit could be utilized for system restoration, it would not (indeed, could					
					not) be classified in advance as a Blackstart Resource within the restoration plan (i.e.,					
					there is no guarantee that the unit would be operating at the time of the disturbance).					
					I revisions are outside of the permissible scope of work for this project. As outlined in the					
					ing language of the Glossary and ROP cross-over terms. For the term Blackstart Resource,					
					th the existing definition in the ROP. To the extent you believe the issues identified in your					
		•	nent project, the	drafting	g team encourages you to submit a SAR outlining the issues and your proposed					
reco	recommendations for resolving those issues.									
18	Jared Shakespeare –	1		Yes						
	Peak Reliability									
SDT	response:									



#	Commenter Organization	Segment	Group name	Y/N	Comment					
19	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.					
SDT	SDT response: Please see the drafting team response to comments submitted by the Southwest Power Pool.									
20	Terry Bilke – Midcontinent ISO, Inc.	2		No	[1] Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. [2] From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a nonexhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. [3] A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.					
CDT	rechance.									

SDT response:

[1] Thank you for sharing your perspective on the efforts undertaken by this drafting team. We believe the project to be worthwhile and a beneficial use of time and resources.

[2] During Phase 1 of this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP ("cross-over terms"), and to the extent there were definitional differences, proposed alignment revisions where appropriate. For each of the cross-over terms under consideration, the drafting team undertook substantial background research before determining whether alignment revisions were appropriate, including an examination of the



#	Commenter Organization	Segment	Group name	Y/N	Comment			
the sterm instance of	history of the term's definition, previous drafting teams' intent, relevant NERC filings to FERC, and any FERC orders approving the term's definition. Additionally, the SDT examined how the term is used in the Glossary, Reliability Standards, and ROP provisions, and how any proposed revisions will affect the application of the standards or rules. As the drafting team completed the task of aligning the cross-over terms, it identified how the definitional differences between the two terms came to exist. The team uncovered a number of reasons as to why definitions found in the Glossary and the ROP were not always aligned. In some instances, the differences were intentional and appropriate; however, in a large majority of instances, the differences were not appropriate or intentional, and in need of revision. Based on this thorough examination, the SDT determined on a case-by-case basis whether alignment revisions were appropriate. The drafting team did not propose alignment revisions to the existing definitions if the alignment resulted in an improper or incorrect change to the meaning of a definition.							
num whe inter liber part thes	Furthermore, the drafting team notes that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations.							
diffe The term diffe term draf (incl proje	[3] The drafting team agrees that in some respects it would be easier to have one document containing all of the NERC defined terms. However, due to the differences in how the two sources are revised and the differences in how the terms are used, the team is not recommending that the two sources are combined. The drafting team notes that the defined terms included in the Glossary and ROP are applicable only with regard to the source in which they are defined (Glossary terms only apply to Reliability Standards, whereas ROP terms only apply to provisions of the ROP). Given that the Reliability Standards and the ROP address very different subject matters and serve different purposes, the definitions are developed and maintained separately. Additionally, the process for revising Glossary terms is substantially different than for revising ROP terms. Glossary terms must be developed (and revised) in the same manner as Reliability Standards - by a drafting team and subject to industry ballot and approval (See Section 5 of the Standards Process Manual). On the other hand, revisions to the Rules of Procedure (including the defined terms found in Appendix 2) are undertaken through Section 1400 of the Rules of Procedure. As indicated above, during Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The team will consider the issues raised in your comments during the Phase 2 development stage.							
21	John Allen – City Utilities of Springfield, Missouri	4		Yes				
SDT	response:							
22	Jeremy Voll –	3		Yes				



#	Commenter Organization	Segment	Group name	Y/N	Comment					
	Basin Electric Power Cooperative									
SDT	SDT response:									
23	Lee Schuster – Duke Energy	3		Yes						
SDT	response:		1							
24	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes						
SDT	<u>response</u> :									
25	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC agrees with the consistency revisions proposed, but respectfully suggests that the SDT overlooked the need to capture the restoration needs and obligations of Reliability Coordinators under EOP-006-2. Thus, the SRC suggests that the SDT add "and Reliability Coordinator's" after each of the "Transmission Operator's" to reflect that, in EOP-006-2, the RC's restoration plan also requires the utilization of Blackstart Resources. Also, the second part of the definition pertains to a generating unit that "is designed to remain energized without connection to the remainder of the System." The SRC suggests that the SDT consider deleting this aspect of the definition due to the fact that, although such a generating unit could be utilized for system restoration, it would not (indeed, could not) be classified in advance as a Blackstart Resource within the restoration plan (i.e., there is no guarantee that the unit would be operating at the time of the disturbance).					
SAR, the c	SDT response: Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.									
26	Heather Morgan –	5		Yes						



## Commenter Organization Formation Commenter Co						•
America LLC	#		Segment	Group name	Y/N	Comment
SDT response: 27 Shawna Speer - Colorado Springs Utilities SDT response: 28 Linda Jacobson-Quinn - City of Farmington SDT response: 29 Dan Wilson - PPL Electric Utilities Corporation SDT response: 30 Yes SDT response: 31 Michiko Sell - Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra - Sound, Washington 33 Yes Yes Yes Yes Yes Yes Yes Yes		EDP Renewables North				
Shawna Speer		America LLC				
Colorado Springs Utilities	SDT	response:				
SDT response: 28 Linda Jacobson-Quinn -	27	Shawna Speer –	1		Yes	
Solition		Colorado Springs Utilities				
City of Farmington Dan Wilson -	SDT	response:				
SDT response: SDT response	28	Linda Jacobson-Quinn –	3		Yes	
SDT response: SDT response		City of Farmington				
PPL Electric Utilities Corporation SDT response: 30 Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington SDT response: 31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington SOT response:	SDT	response:				
Corporation SDT response: 30 Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington SDT response: 31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington SDT response: 33 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington SDT response:	29	Dan Wilson –	5		Yes	
SDT response: 30 Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington SDT response: 31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington 33 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington 34 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington		PPL Electric Utilities				
30 Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington SDT response: 31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington SOT response:		Corporation				
Public Utility District No. 2 of Grant County, Washington SDT response: 31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington SDT response: Yes Yes	SDT	response:				
2 of Grant County, Washington SDT response: 31 Michiko Sell - Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra - Public Utility District No. 2 of Grant County, Washington 5 Yes Public Utility District No. 2 of Grant County, Washington	30	Yvonne McMackin –	4		Yes	
Washington		Public Utility District No.				
SDT response: 31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington 5 Yes Public Utility District No. 2 of Grant County, Washington		2 of Grant County,				
31 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington 5 Yes Yes		Washington				
Public Utility District No. 2 of Grant County, Washington SDT response: 32 Alex Ybarra - 5 Yes Public Utility District No. 2 of Grant County, Washington	SDT	<u>response</u> :				
2 of Grant County, Washington SDT response: 32 Alex Ybarra — 5 Public Utility District No. 2 of Grant County, Washington Yes	31	Michiko Sell –	1		Yes	
Washington SDT response: 32 Alex Ybarra – 5 Yes Public Utility District No. 2 of Grant County, Washington		Public Utility District No.				
SDT response: 32 Alex Ybarra – 5 Yes Public Utility District No. 2 of Grant County, Washington		2 of Grant County,				
32 Alex Ybarra — 5 Yes Public Utility District No. 2 of Grant County, Washington		Washington				
Public Utility District No. 2 of Grant County, Washington	SDT	response:				
2 of Grant County, Washington	32	Alex Ybarra –	5		Yes	
2 of Grant County, Washington		Public Utility District No.				
Washington						
	SDT			•		



rms. For the term of ord "Power" to mod agrees that, whe trafting team will deloping a recommendative (SC) and trages you to attend or Gallo – Energy	Blackstart Reso nodify "Real" wo en possible, ther develop recomn endation relate NERC. It will be	ource, the drafting ould require a chare re should be considered and to prove the decision of	ng team pange to be sistency revent full ised in yethe SC and the SC and the score in the score	On its own, Real is not a defined term. " Real and Reactive Power" should be changed to "Real Power and Reactive Power" for referencing the defined term Real Power. eam revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP proposed revising the Glossary definition to align with the existing definition in the ROP. both the Glossary and ROP definitions. However, the drafting team appreciates your in sentence structure throughout the NERC defined terms. As part of Phase 2 of this ature misalignment or inconsistencies in NERC defined terms. The drafting team will your comments. The drafting team will provide its Phase 2 recommendations to the nd NERC regarding how to best proceed with the recommendations. The drafting team ich will focus on development of these Phase 2 recommendations.
Thank you for yours. For the term ord "Power" to mod agrees that, whe drafting team will deloping a recommendatee (SC) and orages you to attend or Gallo —	Blackstart Reso nodify "Real" wo en possible, ther develop recomn endation relate NERC. It will be ad the next Proje	ource, the drafting ould require a chare re should be considered and to prove the decision of	ig team pange to sistency revent fuited in yethe SC acting whi	eam revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP proposed revising the Glossary definition to align with the existing definition in the ROP. both the Glossary and ROP definitions. However, the drafting team appreciates your in sentence structure throughout the NERC defined terms. As part of Phase 2 of this uture misalignment or inconsistencies in NERC defined terms. The drafting team will rour comments. The drafting team will provide its Phase 2 recommendations to the nd NERC regarding how to best proceed with the recommendations. The drafting team
Energy	6		Yes	
<u> </u>	$\overline{}$	1		
2:				
Coyne – deliability Entity,	10		Yes	
<u>2</u> :				
g Xiao – ba Hydro	5		No	
2:				
canlon –	1	Exelon Utilities	Yes	
<u>2</u> :				
Boisvert –	1		Yes	
В	oisvert – uebec ergie	uebec	oisvert – 1 uebec	oisvert – 1 Yes uebec



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
39	Erika Doot –	5		Yes	
	U.S. Bureau of				
	Reclamation				
SDT	<u>response</u> :				
40	Jason Smith –	2	SPP	Yes	
	Southwest Power Pool,		Standards		
	Inc. (RTO)		Review		
	- (Group		
SDT	response:				
_					
41	Manon Paquet –	1, 5		Yes	
	On Behalf of: Roger				
	Dufresne, Hydro-Quebec				
	Production				
SDT	response:				
42	Robert A. Schaffeld –	1		Yes	
	Southern Company -				
	Southern Company				
	Services, Inc.				
SDT	response:				
<u>351</u>	тезропзе .				
43	Ben Engelby –	6	ACES	Yes	
	ACES Power Marketing		Standards		
			Collaborator		
			s - Terms		
			Project		
SDT	response:				
44	Michelle D'Antuono –	5		Yes	We agree with comments submitted by Occidental Chemical Corporation.
	Oxy - Ingleside			163	we agree with comments submitted by occidental chemical corporation.
CD=	Cogeneration LP			<u> </u>	
<u> 201</u>	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment		
	OT BUTTLE COLO						
45	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes			
SDT	response:						
46	Kathleen Black – DTE Energy	3,4,5		Yes			
SDT	response:						
47	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes			
SDT	response:						
48	Jared Shakespeare – Peak Reliability	1		Yes			
SDT	response:						
49	Tony Eddleman – Nebraska Public Power District	3		Yes			
SDT	response:						
50	Bernard Johnson – Oglethorpe Power Corporation	5		Yes			
SDT	response:						
51	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the definition, as it is currently a defined term.		
	<u>SDT response</u> : Thank you for your comments. The drafting team notes that the "transmission" is not used as a stand-alone term in this definition. However, the						
tean	team agrees that, in general, there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of						



#	Commenter Organization	Segment	Group name	Y/N	Comment		
term mea addr Phas issue to be	capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.						
52	Andrea Jessup – 1,3,5,6 Yes Bonneville Power Administration						
SDT	SDT response:						

End of Report



Consideration of Comments Term 6: Bulk Power System

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 6: Bulk Power System

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

···					
Group Member Name	Entity	Region	Segments		
Joseph Smith	Public Service Electric and Gas	RFC	1		
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3		
Tim Kucey	PSEG Fossil LLC	RFC	5		
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6		

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question 2

Term 6: Bulk-Power System (redline)

Bulk- Power System:

- (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and
- (B) electric energy from generation facilities needed to maintain transmission system reliability.

The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1], defined terms contained in this narrative are not capitalized.) Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning.

The SDT is proposing revisions to both the Glossary and ROP definition in order to align the two terms and maintain consistency with the Federal Power Act. Both the ROP and Glossary definitions have been approved by FERC (See, Glossary: FERC Order; and ROP: FERC Order on Compliance Filing, FERC Order Approving Amendments to the ROP). However, there are a number of differences, mostly minor, in the two definitions. The different language may be perceived to mean that the terms are intended to have different meanings, when this is not the case. There is no reason for the terms to have differing definitions, as both terms are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The SDT revisions align the terms by eliminating the unnecessary differences.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata changes (below is the balloted definition with a redline of the errata changes):

Bulk Power System:

- (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and
- (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1], defined terms contained in this narrative are not capitalized.) (Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning.)

Explanation of errata changes:

The drafting team originally included a parenthetical to clarify that any NERC defined terms contained in the definition of "Bulk Power System" were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical



sentence. Removal of the parenthetical did not alter the meaning or application of the definition, and is not a substantive change.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	response:				
2	Kathy Caignon – City of Vineland	3		Yes	
SDT	<u>response</u> :				
3	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	response:				
			•	•	While we generally support the proposed revisions, we are unable to support the inclusion of the phrase "In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1]," since there are entities such as the IESO that are not under FERC's jurisdiction. We believe this note needs to be reworded as follows: The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with published regulatory documents, defined terms contained in this narrative are not capitalized.) Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning. NERC defined terms contained in the definition of "Bulk Power System" were ieve that the parenthetical creates confusion and unnecessary complication. The
	ting team therefore removed			iters bei	eve that the parenthetical creates confusion and unnecessary complication. The
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	NERC should delete all references to the Federal Power Act throughout these revisions and "re-capitalize" NERC defined terms within all of the definitions. Seminole's reasoning for this is that each term should have one



#	Commenter Organization	Segment	Group name	Y/N	Comment
					reference only. For example, if NERC feels that the defined term "Facilities" does not encapsulate the meaning put forth by Congress of "facilities" in the Federal Power Act, then the drafting team should revise the definition for Facilities. Referencing both the Federal Power Act and the NERC Glossary can cause confusion where legislative background can be interpreted differently than NERC definition drafting team responses and notes.

<u>SDT response</u>: The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of "Bulk Power System" were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.

Additionally, the drafting team agrees that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

6	John Seelke –	1,2,5,6	PSEG	Yes	
	PSEG				
SDT	response:				
7	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.				
SDT	response:				
8	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:				
9	Dennis Minton –	1		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	Florida Keys Electric Cooperative Assoc.								
SDT	response:								
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes					
SDT	SDT response:								
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion believes that all terms which are defined in the NERC Glossary should be capitalized for consistency. We do not agree that an exception, solely to insure that consistency with the Federal Power Act is maintained, should be made. If this exception is accepted, what justification would be used for not being consistent with other regulatory statutes?				
num whe inte liber part thes how	ber of capitalization issues we in the term has the definition inded meaning of the definition ty to address capitalization is of Phase 2 of this project, the e issues. The drafting team w	ere identified al meaning; a n. However, sues if the exe team will coill provide its fting team re	I, including, but not limit nd, capitalization of a te the drafting team revision isting definitions were a posider all of the capitalizations to the commendations. The dragon.	rm that ons were ligned (a zation iss e Standa	se of capitalization throughout the NERC defined terms. During the Phase 1 work, a apitalization of a term that is not a defined term; failure to capitalize a defined term is a defined term but should not be capitalized because it does not have the elimited to alignment of the <i>existing</i> definitions, and therefore the team was not at and the capitalization issue was present in both the ROP and Glossary definition). As sues identified during Phase 1 and develop recommendations for how to address eards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding am encourages you to attend the next Project 2015-04 meeting which will focus on				
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	For consistency with federal documents, Bulk-Power System (with the hyphen) should be used in all documents where appropriate. For NERC documents, capitalization should be consistent. If, for example, Facilities is capitalized in the Glossary, then Facilities should be capitalized in the RoP regardless of how they are shown in federal documents.				
rem	oved because it is not being u	sed as a com	pound modifier (two wo	rds cou	wer System" in the Glossary to align with the ROP definition. The hyphen was oled together to make an adjective). Given that "bulk" is being used to describe the describe "grid," then a hyphen (compound modifier) would be appropriate to				

connect bulk-power. With regard to your comments on consistency, the drafting team agrees that there should consistency in the use of capitalization throughout

Term 6: Bulk Power System



#	Commenter Organization	Segment	Group name	Y/N	Comment
not a not be defined and will be	a defined term; failure to cap be capitalized because it does nitions, and therefore the tea ent in both the ROP and Glos develop recommendations fo	italize a defin s not have the m was not at sary definitio or how to add NERC regardi	ed term when the term intended meaning of the liberty to address capitan). As part of Phase 2 of less these issues. The ding how to best proceed	has the he defini alization this pro rafting to I with the	definitional meaning; and, capitalization of a term that is a defined term but should ition. However, the drafting team revisions were limited to alignment of the <i>existing</i> issues if the existing definitions were aligned (and the capitalization issue was ject, the team will consider all of the capitalization issues identified during Phase 1 eam will provide its recommendations to the Standards Committee (SC) and NERC. It e drafting team recommendations. The drafting team encourages you to attend the recommendations.
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
SDT	response:				
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
SDT	response:				
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	response:			•	
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. We also recommend the last sentence (note) be moved inside the parenthesis so it is not confused with being part of the definition.
cons	-	r Act. Howeve	er, a number of comme	•	NERC defined terms contained in the definition of "Bulk Power System" were lieve that the parenthetical creates confusion and unnecessary complication. The
17	John Pearson –	2		No	ISO New England generally supports the proposed revisions, but is unable to support the inclusion of the phrase "In order to remain consistent with the

Project 2015-04 - Alignment of Terms | Consideration of Comments

Term 6: Bulk Power System



#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Michael Puscas, ISO New England, Inc.				Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1]." ISO New England notes that, since there are entities such as the IESO that are not under FERC's jurisdiction any revisions to the definition should respect the differing regulatory regimes in effect. ISO New England suggests that this note be reworded as follows:
					The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities, defined terms contained in this narrative are not capitalized.) Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning.
cons		r Act. Howev	er, a number of comme	•	NERC defined terms contained in the definition of "Bulk Power System" were ieve that the parenthetical creates confusion and unnecessary complication. The
18	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
19	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the dra	fting team re	sponse to comments su	ıbmitted	by the Southwest Power Pool.
20	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined



#	Commenter	Segment	Group name	Y/N	Comment
	Organization	3 3 1		•	
					by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	afting team res	ponse to your commen	t for Ter	m 4: Blackstart Resource.
21	John Allen – City Utilities of Springfield, Missouri	4		Yes	
SDT	response:	1			
22	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
23	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
24	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:	·			



	Commenter Organization	Segment	Group name	Y/N	Comment
25	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC generally supports the proposed revisions, but is unable to support the inclusion of the phrase "In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1]." The SRC notes that, since there are entities such as the IESO that are not under FERC's jurisdiction, any revisions to the definition should respect the differing regulatory regimes in effect. The SRC suggests that this note be reworded as follows:
					The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities, defined terms contained in this narrative are not capitalized.) Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning.
cons	sistent with the Federal Powe ting team therefore removed	er Act. Howev	er, a number of comme	enters be	NERC defined terms contained in the definition of "Bulk Power System" were lieve that the parenthetical creates confusion and unnecessary complication. The
26	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	response:				
27	Shawna Speer – Colorado Springs Utilities	1		Yes	
	•	1		Yes	
	Colorado Springs Utilities	3		Yes	The terms still don't align – the ROP changes remains ambiguous in that it depends on the context and specifically references Appendix 4E.
SDT 28 SDT referecco	Colorado Springs Utilities response: Linda Jacobson-Quinn — City of Farmington response: The drafting team rences Appendix 4E should be	3 aligned the e e removed sondix 4E to refe	that the definitions are rence the Bulk Electric	No greatest perfectl System (depends on the context and specifically references Appendix 4E. degree possible. However, the team agrees that the ROP definition language that y aligned. As part of Phase 2 of this project, the team will consider a when appropriate) instead of the Bulk Power System. Once the appropriate

August 2015

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#	Commenter Organization	Segment	Group name	Y/N	Comment
	PPL Electric Utilities				
	Corporation				
SDT	response:				
30	Yvonne McMackin –	4		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:	1		1	
	.				
31	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
32	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
33	Mike Smith –	1		No	Proposed changes to 6 (Bulk-Power System), 40 (Reliability Standard) and 41
	Manitoba Hydro				(Reliable Operation) relating to the Federal Power Act are not made consistently.
					Redlined added text referencing the Federal Power Act should be consistently
					written for #6, #40, #41. Bulk-Power System should appear consistently in the
					definitions of #6, #40, #41. Defined terms should be written consistently. If using
					"reliable operation [Reliable Operation]", should also use same approach
					"facilities [Facility(ies)]" for all other defined terms.
SDT	response: The drafting team	included the p	arenthetical to clarify t	hat any	NERC defined terms contained in the definition of "Bulk Power System" were

<u>SDT response</u>: The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of "Bulk Power System" were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.



#	Commenter Organization	Segment	Group name	Y/N	Comment
num whe inter liber part thes how	itionally, the drafting team ag ber of capitalization issues w n the term has the definition nded meaning of the definition ty to address capitalization is of Phase 2 of this project, the e issues. The drafting team w	ere identified al meaning; a on. However, ssues if the ex e team will co vill provide its ofting team re	I, including, but not limit nd, capitalization of a te the drafting team revision isting definitions were a posider all of the capitalizecommendations to the commendations. The dr	red to: ca rm that ons were ligned (a zation is: e Standa	of capitalization throughout the NERC defined terms. During the Phase 1 work, a apitalization of a term that is not a defined term; failure to capitalize a defined term is a defined term but should not be capitalized because it does not have the elimited to alignment of the <i>existing</i> definitions, and therefore the team was not at and the capitalization issue was present in both the ROP and Glossary definition). As sues identified during Phase 1 and develop recommendations for how to address ands Committee (SC) and NERC. It will be the decision of the SC and NERC regarding am encourages you to attend the next Project 2015-04 meeting which will focus on
34	Andrew Gallo – Austin Energy	6		Yes	
SDT	response:				
35	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	Texas RE noticed in this definition, and several others, terms like "facilities" are not capitalized even though "Facility" is a defined term in the Glossary. This thought is not consistently applied throughout the terms (e.g.:"Reliability Standards Development Plan" includes the capitalized term "Reliability Standard"). In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.
term failu beca durii (SC)	ns. During the Phase 1 work, a re to capitalize a defined tern ause it does not have the inte ng Phase 1 and develop recor and NERC. It will be the decis	a number of community of the tenth of the tenth of the tenth of the screen of the SC o	rapitalization issues were erm has the definitional g of the definition. As pa for how to address thes and NERC regarding how	e identifi meaning art of Phase issues w to bes	nere should be consistency in the use of capitalization throughout the NERC defined ed, including, but not limited to: capitalization of a term that is not a defined term; and, capitalization of a term that is a defined term but should not be capitalized ase 2 of this project, the team will consider all of the capitalization issues identified. The drafting team will provide its recommendations to the Standards Committee the proceed with the drafting team recommendations. The drafting team encourages and of these Phase 2 recommendations.
36	Yuguang Xiao – Manitoba Hydro	5		No	
SDT	response:				

Project 2015-04 - Alignment of Terms | Consideration of Comments Term 6: Bulk Power System August 2015



·					
#	Commenter Organization	Segment	Group name	Y/N	Comment
37	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				
38	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
39	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	response:			- 1	
40	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
SDT	response:				
41	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
SDT	response:				
42	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
SDT	response:				
43	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	There needs to be consistency with the use of brackets to signify Glossary/ROP term that are intended to have the meaning of the definition in Section 215 of the Federal Power Act. "Bulk-Power System" did not use brackets for the terms

Project 2015-04 - Alignment of Terms | Consideration of Comments

Term 6: Bulk Power System



#	Commenter	Segment	Group name	Y/N	Comment	
#	Organization	Segment	Group name	T/IN	Comment	
					[Facilities], [Transmission], and [System]. However, the drafting team chose to add brackets to signify Glossary/ROP terms in the "Reliability Standard" and "Reliable Operation" definitions.	
	response: The drafting team onses to Term 6.	believes this co	omment pertains to T	erm 41: R	teliability Standard, not Term 6: Bulk Power System. The team directs you to the	
44	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes		
SDT	response:			<u>.</u>		
45	Kathleen Black – DTE Energy	3,4,5		Yes		
SDT	response:					
46	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes		
SDT	response:					
47	Jared Shakespeare – Peak Reliability	1		Yes		
SDT	response:					
48	Tony Eddleman – Nebraska Public Power District	3		Yes		
SDT	response:					
49	Bernard Johnson – Oglethorpe Power	5		Yes		



#	Commenter Organization	Segment	Group name	Y/N	Comment	
50	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the definition, as it is currently a defined term.	
tern failu beca ther ROP reco deci	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.					
51	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes		
SDT	response:					
52	Patrick Brown - Canadian Electricity Association			No	The Canadian Electricity Association (CEA) requests that a qualifier be inserted to clarify that the Federal Power Act is a U.S. statute. Wording as follows seems appropriate: "In order to remain consistent with the U.S. Federal Power Act" CEA believes that every defined term in the NERC Glossary and ROP should be respectful of Canadian entities - including those applicable governmental authorities in Canada with responsibility for reliability oversight - as well as the North American nature of the grid and NERC's mission as an international reliability organization. If any statute is referenced in the Glossary or ROP, the	

jurisdiction in which that statute is in effect should be clarified, rather than there being an implicit assumption of U.S. jurisdiction. The citations to the U.S. Code and Code of Federal Regulations which follow are not suitable to serve as such references, as they are not necessarily abbreviations which will be familiar to all

In general, CEA believes that the NERC Glossary should not have to refer to

non-legal, third-party audiences in North America.



#	Commenter Organization	Segment	Group name	Y/N	Comment
					specific pieces of governing legislation. However, if the SDT chooses to proceed, CEA requests that it include the U.S. qualifier for the FPA suggested above.

<u>SDT response</u>: Thank you for your comment. In response to your concerns and a number of other industry comments, the drafting team removed the parenthetical containing the reference to the Federal Power Act.

End of Report



Consideration of Comments Term 7: Cascading

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 7: Cascading

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

5



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4	
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Duke Energy

August 2015

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

6



Question

Term 7: Cascading (redline)

Cascading:

The uncontrolled successive loss of <u>system elements Elements</u> 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.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms "System" and "Elements" because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	No	Recommend that this term be moved to Phase 2, whereby it can be redefined in light of FERC's letter approving CIP-014-2. FERC explains that they are removing the word widespread since it is unclear on how it will be enforced.				
"wid subi	SDT response: Thank you for your comment. The drafting team is not addressing this issue as part of its project because the use of the undefined term "widespread" has presented no conflict with aligning the definition of the term "Cascading" across the ROP and the Glossary. The drafting team suggests that you submit a SAR if you believe a development project should address whether FERC's CIP-014-2 letter order warrants reconsideration of the undefined term "widespread" in the definition of "Cascading."								
3	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	SDT response:								
4	Mary Claire Yatsko –	1,3,4,5,6		Yes					



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Seminole Electric				
	Cooperative, Inc.				
SDT	response:				
5	John Seelke –	1,2,5,6	PSEG	Yes	
	PSEG				
SDT	response:			•	
6	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.				
SDT	response:				
7	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:				
	_ 				
8	Dennis Minton –	1		Yes	
	Florida Keys Electric				
	Cooperative Assoc.				
SDT	response:				
					
9	Rob Collins –	1, 6, 5, 3		Yes	
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDT	response:				
10	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	response:		1		
	<u></u> -				
11	Lee Pedowicz –	10	NPCCProject 2015-	No	[1] Introducing the defined terms for System and Elements makes the definition
			04		for Cascading incoherent. The Glossary defines System as a "A combination of
		1	<u> </u>	1	



#	Commenter	Segment	Group name	Y/N	Comment		
"	Organization	Jeginent	Group name	1714	Comment		
	Northeast Power Coordinating Council				generation, transmission, and distribution components." and Element as "Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components." Both System and Element are composed of components. The System components are Elements, and components of Elements are make up the Element. The definition proposed for Cascading starts with "The uncontrolled successive loss of System Elements triggered by an incident at any location." The use of System Elements is redundant. System should be replaced with Bulk Electric System, or otherwise should not be capitalized. [2] Suggest adding the word "local" before the word "area." Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents, within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.		
[1] Todefind [2] Todefind draft properties show	SDT response: [1] The proposed alignment revisions incorporate usage of the defined terms "System" and "Element." These revisions do not change the meaning of the definition of Cascading. [2] Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. For the term Cascading, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.						
SDT	NiSource - Northern Indiana Public Service Co. response:						
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes			
SDT	response:						



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
14	Matthew Beilfuss –	3,4,5,6		Yes	
	WEC Energy Group, Inc.				
SDT	response:				
15	Dennis Chastain –	1,3,5,6		Yes	While "System" and "Element" are defined terms in the Glossary, "System
i	Tennessee Valley				Elements" is not a defined term. A possible rephrasing that would retain the
	Authority				same meaning but avoid the use of conjoined terms would be "The uncontrolled
					successive loss of Elements within a System, triggered by an incident at any
					location."
SDT	response: The drafting team	agrees that t	he consecutive use of t	wo (or mo	ore) defined terms may create confusion. During Phase 2 of this project, the
				-	he team will consider the issue raised in your comments in developing the Phase 2
					ct 2015-04 meeting which will focus on development of the Phase 2
		eam encoura	ges you to attend the h	iext Froje	ct 2013-04 meeting which will focus on development of the Friase 2
recc	ommendations.				
	I	_		T	
16	Jared Shakespeare –	1		Yes	
	Peak Reliability				
SDT	<u>response</u> :				
17	Kaleb Brimhall –	5	Colorado Springs	Yes	We support the Comments Submitted by the Southwest Power Pool.
l	Colorado Springs Utilities		Utilities		
SDT		fting team re	sponse to comments su	ubmitted	by the Southwest Power Pool.
<u> </u>					
18	Terry Bilke –	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the
10	Midcontinent ISO, Inc.	_		110	team and are generally don't have concerns with the definitions presented, this
	Whatehthent 150, inc.				appears to be just the start of a much wider effort that will provide little benefit
					and additional churn of the standards just when we are trying to stabilize them.
					From a standards process paragostive we had access with the CAD and the
					From a standards process perspective, we had concerns with the SAR and the
					meeting notes from the team. The "Detailed Description" section of the SAR says
					it is a non-exhaustive, illustrative listing of the types of work that will be
					undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes
					imply a next step is to go through the standards and in cases where there is a
					lower case word or phrase used that happens to be spelled the same as a defined



				1 .			
#	Commenter Organization	Segment	Group name	Y/N	Comment		
					term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.		
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.		
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.		
SDT	response: Please see the dra	fting team res	sponse to your commen	nt for Ter	m 4: Blackstart Resource.		
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.		
SDT	response:						
20	Jeremy Voll – Basin Electric Power Cooperative	3		No	Recommend that this term be moved to Phase 2, whereby in can me redefined in light of FERC's letter approving CIP-014-2. FERC explains that they are removing the word widespread since it is unclear on how it will be enforced.		
"wid subr	SDT response: Thank you for your comment. The drafting team is not addressing this issue as part of its project because the use of the undefined term "widespread" has presented no conflict with aligning the definition of the term "Cascading" across the ROP and the Glossary. The drafting team suggests that you submit a SAR if you believe a development project should address whether FERC's CIP-014-2 letter order warrants reconsideration of the undefined term "widespread" in the definition of "Cascading."						
21	Lee Schuster – Duke Energy	3		Yes			
<u>SDT</u>	response:						
22	Si Truc Phan –	1		Yes			



			1		
#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Hydro-Quebec				
	TransEnergie				
SDT	response:				
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC recommends that the word "local" be inserted before the word "area." Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.
tean com	n proposed revising the Gloss	ary definition by a developm	n to align with the existir	ng definit	uage of the Glossary and ROP cross-over terms. For the term Cascading, the drafting cion in the ROP. To the extent that you believe the issues identified in your ncourages you to submit a SAR outlining the issues and your proposed
		T	T	T	
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	response:				
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
SDT	response:				
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
29	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
30	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
31	Mike Smith –	1		Yes	
	Manitoba Hydro				
SDT	response:				
32	Andrew Gallo –	6		Yes	
	Austin Energy				
SDT	response:				
33	Rachel Coyne –	10		Yes	Texas RE agrees with the decision to capitalize the words "System" and
	Texas Reliability Entity,				"Elements". Texas RE inquires as to whether this could lead to confusion as there
	Inc.				is no defined term "System Elements", but rather the term "System" is defined
					and the term "Elements" is defined.
SDT	response: The drafting team	agrees that the	consecutive use of t	wo (or m	ore) defined terms may create confusion. During Phase 2 of this project, the
				•	

<u>SDT response</u>: The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The team will consider the issue raised in your comments in developing the Phase 2 recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment				
34	Yuguang Xiao – Manitoba Hydro	5		Yes					
SDT	response:								
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes					
SDT	SDT response:								
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes					
SDT	response:								
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes					
SDT	response:								
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We recommend that use of the term "widespread" in this definition be reviewed in the later phases of this project.				
"wid	SDT response: Thank you for your comment. The drafting team is not addressing this issue as part of its project because the use of the undefined term "widespread" has presented no conflict with aligning the definition of the term "Cascading" across the ROP and the Glossary. The drafting team suggests that you submit a SAR if you believe a development project should address whether FERC's CIP-014-2 letter order warrants reconsideration of the undefined term "widespread" in the definition of "Cascading."								
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes					
SDT	<u>response</u> :								
40	Robert A. Schaffeld –	1		Yes					



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Southern Company -				
	Southern Company				
	Services, Inc.				
SDT	response:				
41	Ben Engelby –	6	ACES Standards	No	Capitalizing "System" fundamentally alters the meaning of the definition because
	ACES Power Marketing		Collaborators -		the NERC Glossary Term "System" includes distribution components. Thus, by
			Terms Project		including distribution components, a hurricane causing "widespread electric
					service interruption" on distribution levels could be defined as Cascading. Clearly
					this is not Cascading.
SDT	response: The proposed alig	nment revision	ons incorporate usage of	f the def	ined terms "System" and "Element." These revisions do not change the meaning of
					does not change the meaning of the definition. When evaluating Cascading one
mus	t analyze the "System," which	n may include	the impacts of a distrib	ution ou	tage as it impacts the transmission and generation.
		·			
42	Andy Bolivar –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	response:				
43	Kathleen Black –	3,4,5		Yes	
	DTE Energy				
SDT	response:				
44	Jennifer Losacco –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	response:				
45	Jared Shakespeare –	1		Yes	
	Peak Reliability				
SDT	response:				
16	Tony Eddloman	2		No	Lounnart MPO NSDE comments
46	Tony Eddleman –	3		No	I support MRO NSRF comments.



			_		
#	Commenter Organization	Segment	Group name	Y/N	Comment
	Nebraska Public Power District				
SDT	response: Please see SDT res	ponse to MR	O NSRF comments.		
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
SDT	response:				
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
SDT	response:				
		nment revisio	ns incorporate usage o	No of the defi	Introducing the defined terms for System and Elements makes the definition for Cascading incoherent. The Glossary defines a System as a "A combination of generation, transmission, and distribution components." and Elements as "Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components." So both System and Elements are composed of components. The System components are Elements, and the Elements components are the mechanical things that make the device work. The definition proposed for Cascading starts with "The uncontrolled successive loss of System Elements triggered by an incident at any location." I think System should not be capitalized or system should be Bulk Electric System Elements since BES is defined differently than System. ned terms "System" and "Element." These revisions do not change the meaning of
the	definition of Cascading.				
51	John Pearson On Behalf of: Michael Puscas, ISO New England, Inc.	2		No	The word "local" should be inserted before the word "area." Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents, within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				

SDT response: Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Cascading, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.

End of Report



Consideration of Comments Term 13: Distribution Provider

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 13: Distribution Provider

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments	
Shannon Mickens	Southwest Power Pool	SPP	2	
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4	
Kevin Giles	Westar Energy	SPP	1,3,5,6	
Robert Hirchak	Cleco Power	SPP	1,3,5,6	
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1	
Jason Smith	Southwest Power Pool	SPP	2	
Mahmood Safi	Omaha Public Power District	MRO	1,3,5	
Don Schmit	Nebraska Public Power District	MRO	1,3,5	
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1	
John Allen	City Utilities of Springfield Missouri	SPP	1,4	
Louis Guidry	is Guidry Cleco Power			

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 13: Distribution Provider (redline)

Distribution Provider:

Provides and operates the "wires" between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the Distribution function at any voltage.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term "Distribution" because it is not a defined term in Glossary (or the ROP).

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment			
1	John Fontenot – Bryan Texas Utilities	1		Yes				
SDT	SDT response:							
2	Kathy Caignon – City of Vineland	3		Yes				
SDT	response:							
3	Emily Rousseau – MRO	1,2,3,4, 5,6	MRO-NERC Standards Review Forum (NSRF)	Yes				
SDT	SDT response:							
4	Leonard Kula – Independent Electricity System Operator	2		Yes	While we do not disagree with the proposed changes, the definition is quite different from that presented in the Functional Model. Suggest to adopt the FM definition, or to revise the definition in the FM to achieve total consistency.			
SDT	SDT response: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As							

outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional



#	Commenter Organization	Segment	Group name	Y/N	Comment
assoc incor	ciated Technical Documents a	at the directi eliability rela	on of the Standards Com ted tasks. The drafting t	nmittee (S	purpose of the FMAG is to maintain the NERC Reliability Functional Model and the C) to ensure the model correctly reflects the industry today and evaluates and ly encourages you to attend the next Project 2015-04 meeting which will focus on
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5, 6		Yes	
<u>SDT</u>	<u>response</u> :				
6	John Seelke – PSEG	1,2,5,6 -	PSEG	Yes	
SDT	response:				
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:				
8	Thomas Foltz – AEP	5		Yes	
<u>SDT</u>	response:				
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:				
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:		1		



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
11	Louis Slade –	6	Dominion Resources,	No	Dominion suggested replacing the term "wires" with "electrical elements" since
	Dominion Resources, Inc.		Inc.		'wires" could be construed to exclude transformers, breakers, switches, reclosers,
					fuses, etc.
	 · · ·		• • •		ns are outside of the permissible scope of work for this project. As outlined in the
					uage of the Glossary and ROP cross-over terms. For the term Distribution Provider,
					sisting definition in the ROP. To the extent that you believe the issues identified in
-		•	elopment project, the dr	afting te	am encourages you to submit a SAR outlining the issues and your proposed
reco	mmendations for resolving th	nose issues.			
		. <u>.</u>	T	T	
12	Lee Pedowicz –	10	NPCCProject 2015-	Yes	
	Northeast Power		04		
	Coordinating Council				
<u>SDT</u>	response:				
			T		
13	Joe O'Brien –	6		Yes	
	NiSource - Northern				
	Indiana Public Service Co.				
SDT	response:				
		T			
14	Andrew Pusztai –	1		Yes	
	American Transmission				
	Company, LLC				
SDT	response:				
15	Matthew Beilfuss –	3,4,5,6		Yes	
	WEC Energy Group, Inc.				
SDT	response:				
16	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary
	Tennessee Valley				definition.
	Authority				
					[1] For form consistency with other registered entity type definitions contained in
					the Glossary, we recommend starting the definition with "The entity that
					provides".

9



#	Commenter Organization	Segment	Group name	Y/N	Comment
					[2] We also recommend capitalization of the word "Transmission" within the DP definition (two locations) because this term is defined in the Glossary and we believe its usage in the DP definition narrative is intended to have the meaning of the defined term.
	The above for a second				[3] "System" is also a defined term in the Glossary, but its use in the DP definition narrative does not appear to have the same meaning as the defined term, since the defined term is inclusive of "distribution components".

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.

17	Jared Shakespeare – Peak Reliability	1	No	[1] We recommend removing the quotes around "wires" as it seems odd to have quotes in a definition.
				[2] Also, Is the DP definition still needed if the risk-based registration project did away with it?

SDT response:

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of "quotes" throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.

[2] The Risk-Based Registration initiative revised the peak load threshold for Distribution Providers. However, no revisions were made to the ROP, Appendix 2 definition of the term. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP. Currently, the two definitions are aligned. The drafting team notes that during Phase 1 of this project, a number of commenters raised concerns regarding possible revisions



#	Commenter Organization	Segment	Group name	Y/N	Comment						
	that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters. 18. Kalah Brimhall										
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.						
SDT	SDT response: Please see the drafting team response to comments submitted by the Southwest Power Pool.										
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just						
	response: Please see the dra				not clear how this is helping and what will be the next project tackled by the team.						



#	Commenter	Segment	Group name	Y/N	Comment					
	Organization									
20	John Allen –	4		Yes						
	City Utilities of									
	Springfield, Missouri									
SDI	<u>response</u> :									
21	Jeremy Voll –	3		Yes						
	Basin Electric Power									
	Cooperative									
SDT	<u>response</u> :									
22	Lee Schuster –	3		Yes						
	Duke Energy									
SDT	<u>response</u> :									
23	Si Truc Phan –	1		Yes						
	Hydro-Quebec									
	TransEnergie									
SDT	<u>response</u> :									
24	Christina Bigelow –	2	IRC Standards Review	Yes	The SRC has previously commented that there needs to be total consistency					
	Electric Reliability Council		Committee		between all fundamental documents within NERC. Thus, while it does not					
	of Texas, Inc.				disagree with the proposed changes, it recommends that the SDT take this					
					opportunity to also synchronize this definition with the Functional Model.					
		•	· · · · · · · · · · · · · · · · · · ·		nctional Model fall outside the permissible scope of the work for this project. As					
	and the second of the second o		· · · · · · · · · · · · · · · · · · ·		e existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of					
	this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional									
	Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the									
	associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on									
	lopment of the Phase 2 recor	•		un mgn	iny encourages you to attend the next Project 2015-04 meeting which will locus on					
25	Heather Merger	-		Voc						
25	Heather Morgan –	5		Yes						



#	Commenter Organization	Segment	Group name	Y/N	Comment
	EDP Renewables North				
	America LLC				
SDT	response:				
26	Shawna Speer –	1		Yes	
	Colorado Springs Utilities				
SDT	response:	-			
27	Linda Jacobson-Quinn –	3		No	The NERC Functional Model also includes a definition for Distribution Provider.
	City of Farmington				This term The functional entity that provides facilities that interconnect an End-
					use Customer load and the electric system for the transfer of electrical energy to
					the End-use Customer. The NERC Functional Model should also align with the
					NERC RoP and Glossary of Terms.
this p	project, the drafting team will	l make a reco	mmendation to the Star	ndards Co	e <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the
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outling this produced Modern associations of the contraction of the contraction of the contraction outliness of the contraction outliness produced as a contraction outliness	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent r	I make a reco r-approved al at the directio eliability relat	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	ndards Co that the mittee (S	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this particular of the	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent r lopment of the Phase 2 recor	make a reco r-approved all at the directio eliability relat mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	ndards Co that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this particular of the	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent r lopment of the Phase 2 recor Dan Wilson — PPL Electric Utilities	make a reco r-approved all at the directio eliability relat mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	ndards Co that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this plant of the second of the seco	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent re lopment of the Phase 2 recor	make a reco r-approved all at the directio eliability relat mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	ndards Co that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this production of the	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent relopment of the Phase 2 recorporates Dan Wilson — PPL Electric Utilities Corporation response:	make a reco r-approved all at the direction eliability relate mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this plant of the second of the seco	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent relopment of the Phase 2 record Dan Wilson — PPL Electric Utilities Corporation response: Yvonne McMackin —	make a reco r-approved all at the directio eliability relat mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	ndards Co that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this production of the	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent relopment of the Phase 2 record Dan Wilson — PPL Electric Utilities Corporation response: Yvonne McMackin — Public Utility District No.	make a reco r-approved all at the direction eliability relate mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this production of the	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent relopment of the Phase 2 record Dan Wilson — PPL Electric Utilities Corporation response: Yvonne McMackin — Public Utility District No. 2 of Grant County,	make a reco r-approved all at the direction eliability relate mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this produced association development with the second association of the second associat	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent relopment of the Phase 2 record Dan Wilson — PPL Electric Utilities Corporation response: Yvonne McMackin — Public Utility District No.	make a reco r-approved all at the direction eliability relate mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and
outling this produced association development with the second association of the second associat	project, the drafting team will el to incorporate the industry ciated Technical Documents a porates new and emergent relopment of the Phase 2 record Dan Wilson — PPL Electric Utilities Corporation response: Yvonne McMackin — Public Utility District No. 2 of Grant County, Washington	make a reco r-approved all at the direction eliability relate mmendations	mmendation to the Star ignment revisions. Note on of the Standards Com ted tasks. The drafting to	that the mittee (Seam high	ommittee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the GC) to ensure the model correctly reflects the industry today and evaluates and



					· ·	
#	Commenter	Segment	Group name	Y/N	Comment	
	Organization					
	Public Utility District No.					
	2 of Grant County,					
	Washington					
SDT	response:					
24	AL M			Τ.,		
31	Alex Ybarra –	5		Yes		
	Public Utility District No.					
	2 of Grant County,					
	Washington					
CDT						
301	response:					
				T		
32	Mike Smith –	1		Yes		
	Manitoba Hydro					
SDT	response:					
301	response.					
				1		
33	Andrew Gallo –	6		Yes		
	Austin Energy					
SDT	response:	1				
301	<u>response</u> .					
			T	1		
34	Rachel Coyne –	10		Yes		
	Texas Reliability Entity,					
	Inc.					
SDT	response:					
301	i caponac.					
			T			
35	Yuguang Xiao –	5		Yes		
	Manitoba Hydro					
SDT response:						
26			l = 1	Τ.,		
36	Chris Scanlon –	1	Exelon Utilities	Yes		
	Exelon					
SDT	response:					
27	Martin Daisyart	1		Voc		
37	Martin Boisvert –	1		Yes		



#	Commenter Organization	Segment	Group name	Y/N	Comment			
	Hydro-Quebec TransEnergie							
SDT	SDT response:							
38	Erika Doot –	5		Yes				
	U.S. Bureau of							
SDT	Reclamation response:							
39	Jason Smith –	2	SPP Standards	Yes				
	Southwest Power Pool, Inc. (RTO)		Review Group					
SDT	response:							
			T					
40	Manon Paquet – On Behalf of: Roger	1, 5		Yes				
	Dufresne, Hydro-Quebec							
	Production							
SDT	<u>response</u> :							
41	Robert A. Schaffeld –	1		Yes				
	Southern Company -							
	Southern Company Services, Inc.							
SDT	SDT response:							
42	Don Engelby		ACES Standards	Vos				
42	Ben Engelby – ACES Power Marketing	6	Collaborators - Terms	Yes				
	, told i ower marketing		Project					
SDT	SDT response:							
43	Andy Bolivar –	1		Yes				
	NextEra Energy - Florida							
	Power and Light Co.							



#	Commenter Organization	Segment	Group name	Y/N	Comment		
CDT							
301	SDT response:						
44	Kathleen Black – DTE Energy	3,4,5		Yes			
SDT	SDT response:						
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes			
SDT	response:						
46	Jared Shakespeare – Peak Reliability	1		Yes	[1] We recommend removing the quotes around "wires" as it seems odd to have quotes in a definition.		
					[2] Also, Is the DP definition still needed if the risk-based registration project did away with it?		
[1] Tof Place team Stan enco	SDT response: [1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of "quotes" throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations. [2] The Risk-Based Registration initiative revised the peak load threshold for Distribution Providers. However, no revisions were made to the ROP, Appendix 2 definition of the term. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP. Currently,						
that	the two definitions are aligned. The drafting team notes that during Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.						
47	Tony Eddleman – Nebraska Public Power District	3		Yes			
SDT	SDT response:						



#	Commenter Organization	Segment	Group name	Y/N	Comment		
48	Bernard Johnson –	5		Yes			
	Oglethorpe Power						
SDT	Corporation response:						
301	тезропзе.						
49	Colby Bellville –	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the		
	Duke Energy				definition, as it is currently a defined term.		
SDT	SDT response:						
Phas	Phase 2 – same response as Comment [16] above						
50	Andrea Jessup –	1,3,5,6		Yes			
	Bonneville Power						
	Administration						

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.

End of Report



Consideration of Comments Term 14: Element

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015
Associated Ballot: Term 14: Element

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

* = *			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



ohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 14: Element (redline)

Element:

Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An <u>element Element</u> may be comprised of one or more components.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Element" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	response:		l		
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	<u>response</u> :				
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
SDT	response:				
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment				
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes					
SDT	response:								
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes					
SDT	SDT response:								
7	Thomas Foltz – AEP	5		Yes					
SDT	response:		,						
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes					
SDT	response:								
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes					
SDT	response:								
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion does not believe it is necessary to use the capitalized version of a term in the definition of that term. For consistency with the first sentence of the definition, Dominion suggest the following: "Element: Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components electrical devices. "				
SDT	response: Thank you for you	r comment.	The drafting team belie	ves the pi	roposed alignment revisions are appropriate.				



#	Commenter Organization	Segment	Group name	Y/N	Comment
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	Yes	
SDT	<u>response</u> :				
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
SDT	response:				
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
SDT	response:				
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	response:				
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. We also recommend capitalization of "Transmission Line" within the Element definition because this term is defined in the Glossary and we believe its usage in the Element definition narrative is intended to have the meaning of the defined term.
SDT	response: Thank you for you	r comments	The drafting team agree	s that th	nere should be consistency in the use of capitalization throughout the NERC defined

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the



#	Commenter Organization	Segment	Group name	Y/N	Comment
	sion of the SC and NERC rega 5-04 meetings which will focu				eam recommendations. The drafting team encourages you to attend future Project endations.
16	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the dra	fting team re	sponse to comments s	ubmitted	by the Southwest Power Pool.
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort,



#	Commenter Organization	Segment	Group name	Y/N	Comment
					particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	fting team re	sponse to your comme	nt for Ter	m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
SDT	response:				
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
21	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
SDT	response:				
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	response:				

August 2015



#	Commenter Organization	Segment	Group name	Y/N	Comment
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
SDT	response:				
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:				
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
SDT	response:				
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	response:				
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	response:				
31	Mike Smith – Manitoba Hydro	1		Yes	
SDT	response:				



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#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
			1		
32	Andrew Gallo –	6		Yes	
	Austin Energy				
SDT	<u>response</u> :				
33	Rachel Coyne –	10		Yes	The last sentence is exactly what Texas Re would like to see. The term is
	Texas Reliability Entity,				capitalized because it is defined and is intended to have the meaning of the
	Inc.				defined term. Additionally, it would be helpful to list examples of components,
					such as wave traps, air switches, transformer tap changers, etc.
SDT	response: Thank you for you	ur comments.			
34	Yuguang Xiao –	5		Yes	
	Manitoba Hydro				
SDT	response:				
35	Chris Scanlon –	1	Exelon Utilities	Yes	
	Exelon				
SDT	response:				
				1	
36	Martin Boisvert –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	<u>response</u> :				
37	Erika Doot –	5		Yes	
	U.S. Bureau of				
	Reclamation				
SDT	response:		L	<u> </u>	
	<u>, </u>				
38	Jason Smith –	2	SPP Standards	Yes	
	Southwest Power Pool,		Review Group		
	Inc. (RTO)				
SDT	response:				
<u> </u>					



Manon Paquet -	#	Commenter Organization	Segment	Group name	Y/N	Comment
On Behalf of: Roger Dufresne, Hydro-Quebec Production SDT response: 40 Robert A. Schaffeld — 1 Southern Company - Southern Co						
ACES Power Marketing Collaborators - Terms Project	39	On Behalf of: Roger Dufresne, Hydro-Quebec	1, 5		Yes	
Southern Company Southern Company Services, Inc. SDT response: 41 Ben Engelby — 6 ACES Standards Collaborators - Terms Project SDT response: Thank you for your comments. The drafting team agrees that there should be capitalized. The should be capitalized to represent the terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and clossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations. 42 Andy Bolivar — 1 Yes NextEra Energy - Florida Power and Light Co. SDT response: 43 Kathleen Black — 3,4,5 Yes PTE Energy	SDT	response:				
Ben Engelby — 6 ACES Standards Collaborators - Terms Project SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations. 42 Andy Bolivar — 1 Yes Arthleen Black — 3,4,5 Yes	40	Southern Company - Southern Company	1		Yes	
ACES Power Marketing Collaborators - Terms Project should be capitalized. SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations. 42 Andy Bolivar - 1 Yes SDT response: 43 Kathleen Black - 3,4,5 Yes And Kathleen Black - 3,4,5 Yes	SDT	<u>response</u> :				
terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations. 42 Andy Bolivar - NextEra Energy - Florida Power and Light Co. SDT response: 43 Kathleen Black - DTE Energy 3,4,5 Yes	41		6	Collaborators -	No	
NextEra Energy - Florida Power and Light Co. SDT response: 43 Kathleen Black - 3,4,5 DTE Energy Yes	term failu beca ther ROP reco deci	ns. During the Phase 1 work, a re to capitalize a defined terrause it does not have the inte- efore the team was not at lib and Glossary definition). As p ammendations for how to add sion of the SC and NERC regar 5-04 meetings which will focu	a number of come when the tended meaning erty to addreso art of Phase dress these issuiding how to	apitalization issues were erm has the definitional g of the definition. Howe ss capitalization issues if 2 of this project, the tea sues. The drafting team best proceed with the d	e identifi meaning ever, the the exis m will co will prov rafting to	ed, including, but not limited to: capitalization of a term that is not a defined term; g; and, capitalization of a term that is a defined term but should not be capitalized a drafting team revisions were limited to alignment of the <i>existing</i> definitions, and uting definitions were aligned (and the capitalization issue was present in both the consider all of the capitalization issues identified during Phase 1 and develop ide its recommendations to the Standards Committee (SC) and NERC. It will be the earn recommendations. The drafting team encourages you to attend future Project
43 Kathleen Black – 3,4,5 Yes DTE Energy	42	NextEra Energy - Florida	1		Yes	
DTE Energy	SDT	response:				
SDT response:	43		3,4,5		Yes	
	SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	<u>response</u> :				
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
SDT	response:				
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
SDT	<u>response</u> :				

End of Report



Consideration of Comments Term 17: Generator Operator

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 17: Generator Operator

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

August 2015

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

4



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

August 2015



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4	
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 17: Generator Operator (redline)

Generator Operator:

The entity that operates generating <u>Facility(ies)</u> <u>unit(s)</u> and performs the functions of supplying energy and Interconnected Operations Services.

The SDT is proposing to revise the Glossary definition to align with the ROP. This is because the term "unit" (used in the current Glossary definition) is not a NERC defined term, and thus introduces the possibility of inconsistent use or application of the definition. The ROP definition provides greater clarity because it uses the term "Facility(ies)," which is defined by NERC as, "a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)." (See also, NERC Limited Answer to RBR Comments, pp. 6-7: "Finally, NERC's proposed changes to the definitions of "Generator Owner" and "Generator Operator" which include replacing the undefined term "generating units" with the term "Facilities," are appropriate. The term "Facilities" is defined in the NERC Glossary as a Bulk Electric System element, which ties in directly to the new BES definition. Use of the term "Facilities" has allowed NERC to eliminate the Part III threshold criteria and use the new Bulk Electric System core definition, inclusions and exclusions to identify Bulk Electric System generator assets.")

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	response:				
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	response:				
3	Leonard Kula – Independent Electricity System Operator	2		Yes	We agree with the proposed changes, but suggest to also change the definition in the Functional Model to achieve total consistency.



#	Commenter Organization	Segment	Group name	Y/N	Comment
outli this Mod asso inco	ned in the SAR, the drafting project, the drafting team will lel to incorporate the industriciated Technical Documents	team revision Il make a reco y-approved a at the direction reliability rela	s were limited to alignrommendation to the Stalignment revisions. Not on of the Standards Corted tasks. The drafting	ment of th andards C te that the mmittee (unctional Model fall outside the permissible scope of the work for this project. As the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of committee that the Functional Model Advisory Group (FMAG) update the Functional expurpose of the FMAG is to maintain the NERC Reliability Functional Model and the SC) to ensure the model correctly reflects the industry today and evaluates and only encourages you to attend the next Project 2015-04 meeting which will focus on
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	The grammar of this definition does not appear to be correct. Seminole suggest "The entity that operates a generating Facility(ies) and performs the function of supplying energy and interconnected Operations Services."
draf iden	ting team revisions were limi	ted to alignmuld be address	ent of the <i>existing</i> lang sed by a development p	uage of th	s fall outside the permissible scope of work for this project. As outlined in the SAR, the ne Glossary and ROP cross-over terms. To the extent that you believe the issues ne drafting team encourages you to submit a SAR outlining the issues and your
5	John Seelke – PSEG	1,2,5,6 -	PSEG	No	The comments below apply to both Term 17 (GOP) and Term 18 (GO) The SDT proposes to change "generating unit(s)" to "generating Facility(ies)" in the NERC Glossary definitions for Generator Owner (GO) and Generator Operator (GOP). The NERC Glossary term "Facility" means "a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)." While NERC has adopted new GO and GOP definitions for registration purposes, that action did not impact any GO or GOP registrations. However, extending those changes to the NERC Glossary will mean that the new definitions will apply to every existing and future Reliability Standards wherever "Generator Owner" and "Generator Operator" appears. As discussed below, the proposed definition changes may have unintended consequences for all GOs and GOPs. Therefore, PSEG is voting "Negative" until the SDT provides answers to the questions below.



#	Commenter Organization	Segment	Group name	Y/N	Comment
					1. For Inclusion I4 dispersed power producing resources (as defined in the Bulk Electric System definition), are busses and step-up transformers at points that aggregate less than 75 MVA of the output included in the "set of electrical equipment" needed to operate those resources? Please explain. If "yes," may current or future Reliability Standards apply to such collector buses and step-up transformers if the NERC Glossary terms for GO and GOP are changed as proposed?
					2. Are "generator interconnection Facilities" included in the "set of electrical equipment" needed to operate all generating Facilities? Please explain.
					If "yes," may current or future Reliability Standards apply to such generator interconnection Facilities if the NERC Glossary terms for GO and GOP are changed as proposed? Background for this question and one follow-up question on this topic are provided below:
					Background: This term "generator interconnection facility" is defined Order No. 785 – see Paragraph 37. In Project 2010-07 (Generator Requirements at the Transmission Interface), that project's team considered, but decided against, creating a definition for NERC Glossary term for "generator interconnection Facilities" – see Paragraph 36 – or redefining the meaning of "Generator Owner" and Generator Operator" to include generator interconnection Facilities as recommended by the prior Ad Hoc Group Report referenced in Paragraph 6 of Order No. 785.
					Follow-up question: This Project 2015-04 team is encouraged to review Order No. 785 from this perspective of GOs and GOPs that may be currently also registered as TOs and TOPs because of their operation and ownership of generation interconnection Facilities. If the definitions of GO and GOP are amended as proposed, will such entities be subject to double jeopardy as a result of two registrations addressing the same facilities? See Paragraphs 41-53 and Paragraphs 54-57 in Order No. 785. This includes Cedar Creek and Harquahala. See Paragraphs 4-6 and Paragraph 54 in Order No. 785.



#	Commenter Organization	Segment	Group name	Y/N	Comment
					3. For all non-CIP NERC standards, will the proposed changes to the GO and GOP definitions expand the scope of "electrical equipment" needed to operate a BES generator to include non-electrical plant equipment and facilities such as boilers, turbines and the fuel/motive and cooling systems for them; all balance-of-plant and generator lubrication and cooling systems; plant building and site safety and security systems; plant emissions and discharge systems, monitoring and control systems other than a generator's AVR, PSS, and governor.
app Glos com	roved definition of BES and a ssary supports the goal, outli apliance with the approved R	ligns with the oned in Section! eliability Stand	definition of Generator 501 of the Rules of Prod ards. The definition of G	Operato cedure, f GOP in tl	a defined term (Facility), which provides greater clarity in the context of the FERC- ir in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and for clear and consistent identification of those entities that are responsible for the NERC Glossary only relates to who must comply with the requirements in the
Glos also	ssary definition would not had meet the revised definition. litionally, the drafting team n	ve an effect on otes that as pa	who would be conside ort of Phase 2, the team	red a GO	ements. The drafting team determined that the proposed modification to the OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team cus on development of the SAR and Phase 2 recommendations.
Glos also	ssary definition would not had meet the revised definition. litionally, the drafting team n	ve an effect on otes that as pa	who would be conside ort of Phase 2, the team	red a GO	OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team
Add high	ssary definition would not had meet the revised definition. litionally, the drafting team nolly encourages you to attend Amy Casuscelli –	ve an effect on lotes that as pa the next drafti	who would be conside ort of Phase 2, the team	will sub	OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team
Add high	ssary definition would not had meet the revised definition. ditionally, the drafting team now the normally encourages you to attend Amy Casuscelli — Xcel Energy, Inc.	ve an effect on lotes that as pa the next drafti	who would be conside ort of Phase 2, the team	will sub	OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team
Glos also Add high 6 SDT	ssary definition would not had meet the revised definition. ditionally, the drafting team in ally encourages you to attend the Amy Casuscelli — Xcel Energy, Inc. Tresponse: Thomas Foltz —	notes that as pa the next drafti 1,3,5,6	who would be conside ort of Phase 2, the team	will sub h will foo Yes	OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team
Glos also Add high 6 SDT	Amy Casuscelli – Xcel Energy, Inc. Tresponse: Thomas Foltz – AEP	notes that as pa the next drafti 1,3,5,6	who would be conside ort of Phase 2, the team	will sub h will foo Yes	OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team
Add high 6 SDT 7 SDT 8	Amy Casuscelli — Xcel Energy, Inc. Tresponse: Thomas Foltz — AEP Tresponse: Dennis Minton — Florida Keys Electric	otes that as pa the next drafti 1,3,5,6	who would be conside ort of Phase 2, the team	will sub h will foo Yes	OP. That is, the same entities that would meet the current definition of GOP would mit a SAR recommending revisions to the definition of "Facility." The drafting team



#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDT	<u>response</u> :				
10	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	<u>response</u> :				
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	Considering the definition of Facility listed in the Glossary, a TOP operating a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as operating a "generating Facility". Would the TOP therefore be under an obligation to register as a GOP? Even though Footnote 3 on page 6 preceding mentions that "the clarity and content of the current definition could be improved", and a SAR will be drafted, this should be taken care of now under this project.
appr Glos com Relia Glos also	roved definition of BES and all sary supports the goal, outlin pliance with the approved Reability Standards. It does not sary definition would not have meet the revised definition.	igns with the led in Section eliability Stand relate to the lean effect or other than the lean effect or other than as particular than the lean effect as particular than the lean effect of the lean effect or other than the lean effect of the lean effect or other than the lean effect of the lean effect or other than the lean effect of	definition of Generator (501 of the Rules of Proc dards. The definition of G facilities subject to those n who would be consider art of Phase 2, the team	Operato redure, f GOP in the require red a GC	a a defined term (Facility), which provides greater clarity in the context of the FERC-r in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and or clear and consistent identification of those entities that are responsible for the NERC Glossary only relates to <i>who</i> must comply with the requirements in the ements. The drafting team determined that the proposed modification to the DP. That is, the same entities that would meet the current definition of GOP would make a SAR recommending revisions to the definition of "Facility." The drafting team cause on development of the SAR and Phase 2 recommendations.
12	Joe O'Brien –	6		Yes	
	NiSource - Northern				
	Indiana Public Service Co.				
SDT	response:				
13	Andrew Pusztai –	1		Yes	
		1	1	1	



			-		•
#	Commenter Organization	Segment	Group name	Y/N	Comment
	American Transmission Company, LLC				
SDT	response:				
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	response:				
the iden	drafting team revisions were	imited to alig	nment of the <i>existing</i> lated by a development p	anguage (For alignment purposes, we agree with the proposed change to the Glossary definition. We also think the addition of "electrical" prior to "energy" would add further clarity to the Generator Operator definition. If added, it should be capitalized as "Electrical Energy" since this term is also in the Glossary. In reviewing the Generator Operator definition, we observed that the definition of "Interconnected Operations Service" (IOS) in the Glossary is vague. The IOS definition (also being addressed by this project as Term 24) appears to have been taken from a NERC reference document that was developed in 2001 and filed with FERC under docket No. RM01-12, Electricity Market Design and Structure. To the extent that there are any IOS that are not performed by the Generator Operator in the market constructs of 2015, the definition may be overstating the functions supplied by the Generator Operator. Is fall outside the permissible scope of work for this project. As outlined in the SAR, of the Glossary and ROP cross-over terms. To the extent that you believe the issues are drafting team encourages you to submit a SAR outlining the issues and your
16	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the dra	fting team res	sponse to comments su	bmitted	by the Southwest Power Pool.



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
18 SDT	Terry Bilke – Midcontinent ISO, Inc. response: Please see the dra	tting team res	sponse to your commen	No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team. m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
SDT	response:				
20	Jeremy Voll –	3		Yes	
	· · · · · · · · · · · · · · · · · · ·	1		1	



DT re	Basin Electric Power Cooperative esponse: Lee Schuster — Duke Energy esponse:	3		Yes	
DT re	esponse: Lee Schuster – Duke Energy	3		Yes	
1 DT re	Lee Schuster – Duke Energy	3		Yes	
DT re	Duke Energy	3		Yes	
DT re					
2	<u>esponse</u> :				
	Si Truc Phan –	1		No	Considering the definition of Facility listed in the Glossary, a TOP operating a
	Hydro-Quebec				synchronous condenser or shunt compensator, which generates Mvars, could
	TransEnergie				potentially qualify as operating a "generating Facility". Would the TOP therefore
					be under an obligation to register as a GOP? Even though Footnote 3 on page 6
					preceding mentions that "the clarity and content of the current definition could
					be improved", and a SAR will be drafted, this should be taken care of now under
			1.1. 1.6. 1 (this project.
ppro ilossa ompl eliab ilossa Iso m	oved definition of BES and alicary supports the goal, outlin liance with the approved Rebility Standards. It does not ary definition would not have neet the revised definition.	gns with the ed in Section liability Stand relate to the e an effect or tes that as pa	definition of Generator 501 of the Rules of Prod lards. The definition of G facilities subject to thos n who would be consider art of Phase 2, the team	Operato cedure, f GOP in the e require red a GC	n a defined term (Facility), which provides greater clarity in the context of the FERC-r in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and for clear and consistent identification of those entities that are responsible for the NERC Glossary only relates to who must comply with the requirements in the ements. The drafting team determined that the proposed modification to the DP. That is, the same entities that would meet the current definition of GOP would make a SAR recommending revisions to the definition of "Facility." The drafting team cause on development of the SAR and Phase 2 recommendations.
				T	
	Christina Bigelow –	2	IRC Standards	Yes	The SRC has previously commented that there needs to be total consistency
	Electric Reliability Council		Review Committee		between all fundamental documents within NERC. Thus, while it does not
	of Texas, Inc.				disagree with the proposed changes, it recommends that the SDT take this
	- 1		1161	<u> </u>	opportunity to also synchronize this definition with the Functional Model.
	_ .				unctional Model fall outside the permissible scope of the work for this project. As
			_		ne <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase Committee that the Functional Model Advisory Group (FMAG) update the Funct

Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the



#	Commenter Organization	Segment	Group name	Y/N	Comment
inco		reliability relate			SC) to ensure the model correctly reflects the industry today and evaluates and hly encourages you to attend the next Project 2015-04 meeting which will focus on
24	Heather Morgan – EDP Renewables North America LLC	5		No	Generator Operator: The entity that operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services.
SDT	response:				
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	FEUS agrees with the term but recognizes it also used in the NERC Functional Model. The NERC Functional Model should be modified to align with the Glossary of Terms.
this Mod asso inco	project, the drafting team widel to incorporate the industrated Technical Documents rporates new and emergent elopment of the Phase 2 reco	ill make a recon ry-approved alig at the direction reliability relate	nmendation to the St gnment revisions. Not of the Standards Co	andards C te that the mmittee (ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of Committee that the Functional Model Advisory Group (FMAG) update the Functional purpose of the FMAG is to maintain the NERC Reliability Functional Model and the SC) to ensure the model correctly reflects the industry today and evaluates and anly encourages you to attend the next Project 2015-04 meeting which will focus on
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:	<u> </u>			
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	<u>response</u> :				
30	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
31	Mike Smith –	1		No	Inconsistent approach is used for referencing defined terms with different
	Manitoba Hydro				suffixes. For defined term "Facility", sometimes referenced as "Facilities" and
					other times "Facility(ies)".
					Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
					nere should be consistency in the use of suffixes throughout the NERC defined
				•	mendations to prevent future misalignment or inconsistencies in NERC defined
	· · · · · · · · · · · · · · · · · · ·	•			to the issue raised in your comments. The drafting team will provide its Phase 2
					ecision of the SC and NERC regarding how to best proceed with the
		team encoura	ges you to attend future	e Project	2015-04 meetings which will focus on development of these Phase 2
reco	mmendations.				
				Ι.,	
32	Andrew Gallo –	6		Yes	
655	Austin Energy				
SDT	<u>response</u> :				
33	Rachel Coyne –	10		Yes	
	Texas Reliability Entity,				
	Inc.				
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Organization				
34	Yuguang Xiao – Manitoba Hydro	5		No	
<u>SDT</u>	response:				
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:	·			
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	See comments from NPCCProject 2015-04.
SDT	response: Please see drafti	ng team respor	nse to NPCC-Project 20	015-04 con	nments.
37	Erika Doot – U.S. Bureau of Reclamation	5		No	Reclamation does not agree with the drafting team's proposed incorporation of the term "Facilities" into the NERC Glossary definitions of Generator Operator and Generator Owner. As noted by the drafting team, the definition of "Facilities" is ambiguous and in need of revision. Reclamation recommends that the terms Generator Operator and Generator Owner be placed in Category 2 and remain unchanged until the definition of Facility is improved so the impacts of the change in definition can be better understood.
	response: Thank you for yose 1 of this project.	ur comments.	Given the purpose of	the projec	t, the drafting team believes it appropriate to align the existing definitions as part of
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We would like to see phase 2 of this project add language to this definition such as: "Not to be confused with the actual operating personnel running the generating Facility(ies)". The intent being to clarify that the reference is to the "function" and not the "personnel".

<u>SDT response</u>: Thank you for your comments. At this time, during Phase 2 of this project, the team does not anticipate submitting a SAR proposing to modify the definition of Generator Operator. The team notes that it does anticipate submitted a SAR recommending revisions to the definition of "Facility." To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR proposing revisions to the definition of Generator Operator.



#	Commenter Organization	Segment	Group name	Y/N	Comment
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		No	Considering the definition of Facility given in the Glossary, a TOP operating a synchronous condenser or a shunt compensator, which generates Mvars, could potentially qualify as operating a "generating Facility", therefore being under the obligation to register as a GOP?
appi Glos com Relia Glos also	roved definition of BES and all sary supports the goal, outline pliance with the approved Reability Standards. It does not assary definition would not have meet the revised definition.	ligns with the ned in Section eliability Stand relate to the ve an effect of ottes that as potes that as potential that as potential that as potential that as potential that are potential that are potential that are potential that the potential t	definition of Generato 501 of the Rules of Products. The definition of facilities subject to the who would be considered art of Phase 2, the tear	r Operato ocedure, for f GOP in the ose required lered a GC	a defined term (Facility), which provides greater clarity in the context of the FERC-r in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and or clear and consistent identification of those entities that are responsible for the NERC Glossary only relates to who must comply with the requirements in the ements. The drafting team determined that the proposed modification to the DP. That is, the same entities that would meet the current definition of GOP would must a SAR recommending revisions to the definition of "Facility." The drafting team cause on development of the SAR and Phase 2 recommendations.
					as on development of the same and muse a recommendations.
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
40	Southern Company - Southern Company	1			
40	Southern Company - Southern Company Services, Inc.	6	ACES Standards Collaborators - Terms Project		
40 <u>SDT</u> 41	Southern Company - Southern Company Services, Inc. response: Ben Engelby –		Collaborators -	Yes	
40 <u>SDT</u> 41	Southern Company - Southern Company Services, Inc. response: Ben Engelby – ACES Power Marketing		Collaborators -	Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
40 SDT 41 SDT 42 SDT recc	Southern Company - Southern Company Services, Inc. response: Ben Engelby – ACES Power Marketing response: Andy Bolivar – NextEra Energy - Florida Power and Light Co. response: Thank you for you	f and a support with the finition of "F	Collaborators - Terms Project The alignment revision acility." The drafting to	Yes Yes Yes ns. The d	Although we are in agreement with the alignment of terms with the ROP, we feel



					•
#	Commenter Organization	Segment	Group name	Y/N	Comment
	DTE Energy				
SDT	response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
reco		efinition of "F	acility." The drafting te		rafting team notes that as part of Phase 2, the team will submit a SAR y encourages you to attend the next Project 2015-04 meeting which will focus on
45	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
SDT	response:			·	
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
SDT	response:			·	



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
50	John Pearson – On Behalf of: Michael Puscas, ISO New England, Inc.	2		Yes	There needs to be total consistency between all fundamental documents within NERC. Thus, while ISO New England does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.

<u>SDT response</u>: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

End of Report



Consideration of Comments Term 18: Generator Owner

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: 2015-04 - Alignment of Terms - Term 18: Generator Owner

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

* = *			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

August 2015



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 18: Generator Owner (redline)

Generator Owner:

Entity that owns and maintains generating Facility(ies)units.

The SDT is proposing to revise the Glossary definition to align with the ROP. This is because the term "unit" (used in the current Glossary definition) is not a NERC defined term, and thus introduces the possibility of inconsistent use or application of the definition. The ROP definition provides greater clarity because it uses the term "Facility(ies)," which is defined by NERC as, "a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)." (See also, NERC Limited Answer to RBR Comments, pp. 6-7: "Finally, NERC's proposed changes to the definitions of "Generator Owner" and "Generator Operator" which include replacing the undefined term "generating units" with the term "Facilities," are appropriate. The term "Facilities" is defined in the NERC Glossary as a Bulk Electric System element, which ties in directly to the new BES definition. Use of the term "Facilities" has allowed NERC to eliminate the Part III threshold criteria and use the new Bulk Electric System core definition, inclusions and exclusions to identify Bulk Electric System generator assets.")

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment		
1	John Fontenot – Bryan Texas Utilities	1		Yes			
SDT	response:						
2	Kathy Caignon – City of Vineland	3		Yes			
SDT	response:			•			
3	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes			
SDT	SDT response:						



#	Commenter	Segment	Group name	Y/N	Comment			
	Organization							
4	Leonard Kula –	2		Yes	We agree with the proposed changes, but suggest to also change the definition in			
	Independent Electricity				the Functional Model to achieve total consistency.			
	System Operator							
SDT	response: Thank you for you	r comments;	however, modifications	to the Fu	unctional Model fall outside the permissible scope of the work for this project. As			
outli	ned in the SAR, the drafting t	eam revision	s were limited to alignm	ent of th	ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of			
this	project, the drafting team wil	I make a reco	mmendation to the Sta	ndards C	ommittee that the Functional Model Advisory Group (FMAG) update the Functional			
Mod	el to incorporate the industry	y-approved a	ignment revisions. Note	that the	e purpose of the FMAG is to maintain the NERC Reliability Functional Model and the			
asso	ciated Technical Documents a	at the direction	on of the Standards Com	mittee (SC) to ensure the model correctly reflects the industry today and evaluates and			
inco	rporates new and emergent r	eliability rela	ted tasks. The drafting t	eam higl	nly encourages you to attend the next Project 2015-04 meeting which will focus on			
deve	lopment of the Phase 2 reco	mmendations	5.					
5	Mary Claire Yatsko –	1,3,4,5,6		No	The grammar of this definition does not appear to be correct. Seminole suggests			
	Seminole Electric				"Entity that owns and maintains a generating Facility(ies).			
	Cooperative, Inc.							
SDT	response: Thank you for you	r comments;	however, your proposed	revision	ns are outside of the permissible scope of work for this project. As outlined in the			
	-				uage of the Glossary and ROP cross-over terms. For the term Generator Owner, the			
			· · · · · · · · · · · · · · · · · · ·		ng definition in the ROP. To the extent that you believe the issues identified in your			
					ncourages you to submit a SAR proposing revisions to the definition of Generator			
Own	er.							
6	John Seelke –	1,2,5,6	PSEG	No	See comments provided for Term 18 previously.			
	PSEG	, , ,			' ',			
SDT	response: Please see drafting	team respon	nse to your comments fo	r Term 1	17: Generator Operator.			
		,	,					
7	Amy Casuscelli –	1,3,5,6		Yes				
,	Xcel Energy, Inc.	1,3,3,6		1.00				
SDT	response:							
301	<u>response</u> .							
8	Thomas Foltz –	_		Voc				
	AEP	5		Yes				
	ALF							
CDT	SDT response:							
SDT	response:							
SDT 9	response: Dennis Minton –	1		Yes				



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#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Florida Keys Electric				
	Cooperative Assoc.				
SDT	response:				
10	Rob Collins –	1, 6, 5, 3		Yes	
10	On Behalf of: Scotty	1, 0, 3, 3		165	
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDT	response:				
<u> 301</u>	iesponse.				
11	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	response:				
12	Lee Pedowicz –	10	NPCCProject 2015-	No	Considering the definition of Facility given in the Glossary, a TO owning a
12	Northeast Power	10	04	No	synchronous condenser or shunt compensator, which generates Myars, could
	Coordinating Council		04		potentially qualify as owning a "generating Facility". Would the TO, therefore, be
	coordinating council				under an obligation to register as a GO? Even though Footnote 4 on page 7
					preceding mentions that "the clarity and content of the current definition could
					be improved", and a SAR will be drafted, this should be taken care of now under
					this project.
SDT	response: The alignment roy	icione roplace	d the undefined term (u	ınit) with	a defined term (Facility), which provides greater clarity in the context of the FERC-
		•		-	GO) in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP
		~		•	re, for clear and consistent identification of those entities that are responsible for
					NERC Glossary only relates to <i>who</i> must comply with the requirements in the
	• • •	•			ments. The drafting team determined that the proposed modification to the
	•		· · · · · · · · · · · · · · · · · · ·		· · ·
	meet the revised definition.	e an enect of	n who would be conside	red a GO	. That is, the same entities that would meet the current definition of GO would
aiso	meet the revised definition.				
٧ ٨ ٨:	tionally the drafting team as	otos that as a	art of Dhaco 2, the team	will cube	nit a SAR recommending revisions to the definition of "Facility." The drafting team
	•	•			us on development of the SAR and Phase 2 recommendations.
High	y encourages you to attend t	ne next urait	ing team meeting, which	wiii ioc	us on development of the SAN and Phase 2 recommendations.
13	Joe O'Brien –	6		Yes	
	555 C B.1611		l		



#	Commenter	Segment	Group name	Y/N	Comment
17	Organization	Segment	Group Hame	1/1	Comment
	NiSource - Northern				
	Indiana Public Service Co.				
SDT	response:				
					
14	Andrew Pusztai –	1		Yes	
	American Transmission				
	Company, LLC				
SDT	response:				
15	Matthew Beilfuss –	3,4,5,6		Yes	
	WEC Energy Group, Inc.				
SDT	response:				
		ı			
16	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary
	Tennessee Valley				definition.
	Authority				
					For form consistency with the Generator Operator definition and other registered
					entity type definitions in the Glossary, we recommend starting the definition with
					"The entity that" rather than "Entity that".
	-				when possible, there should be consistency in sentence structure throughout the
	· · · · · · · · · · · · · · · · · · ·				evelop recommendations to prevent future misalignment or inconsistencies in NERC
	· · · · · · · · · · · · · · · · · · ·				related to the issue raised in your comments. The drafting team will provide its
					e the decision of the SC and NERC regarding how to best proceed with the
		eam encoura	ges you to attend the n	ext Proje	ct 2015-04 meeting which will focus on development of the Phase 2
reco	mmendations.				
47	January Challes and the				
17	Jared Shakespeare –	1		Yes	
CD=	Peak Reliability				
<u>SDT</u>	<u>response</u> :				
18	Kaleb Brimhall –	5	Colorado Springs	Yes	We support the Comments Submitted by the Southwest Power Pool.
	Colorado Springs Utilities		Utilities		
SDT		fting team re	sponse to comments su	bmitted	by the Southwest Power Pool.



#	Commenter	Sogmont	Group name	Y/N	Comment
#	Organization	Segment	Group name	T/N	Comment
1.0					
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	fting team res	sponse to your commen	t for Ter	m 4: Blackstart Resource.
20	John Allen – City Utilities of Springfield, Missouri	4		Yes	
SDT	response:				
21	Jeremy Voll –	3		Yes	
	1 30. C y VOII			103	1



#	Commenter Organization	Segment	Group name	Y/N	Comment		
	Basin Electric Power Cooperative						
SDT	<u>response</u> :						
22	Lee Schuster – Duke Energy	3		Yes			
SDT	<u>response</u> :						
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		No	Considering the definition of Facility given in the Glossary, a TO owning a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as owning a "generating Facility". Would the TO, therefore, be under an obligation to register as a GO? Even though Footnote 4 on page 7 preceding mentions that "the clarity and content of the current definition could be improved", and a SAR will be drafted, this should be taken care of now under this project.		
SDT	response:						
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.		
outli this Mod asso inco	SDT response: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.						
25	Heather Morgan – EDP Renewables North America LLC	5		No	Generator Owner: Entity that owns and maintains generating Facility(ies)		
SDT	response:			'			



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
26	Shawna Speer –	1		Yes	
	Colorado Springs Utilities				
SDT	response:				
27	Linda Jacobson-Quinn –	3			FEUS agrees with the term but recognizes it also used in the NERC Functional
	City of Farmington				Model. The NERC Functional Model should be modified to align with the Glossary
					of Terms.
SDT	response: Thank you for you	r comments; h	owever, modifications	to the Fu	unctional Model fall outside the permissible scope of the work for this project. As
outl	ined in the SAR, the drafting t	eam revisions	were limited to alignm	ent of th	ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of
this	project, the drafting team wil	ll make a reco	mmendation to the Sta	ndards C	committee that the Functional Model Advisory Group (FMAG) update the Functional
Mod	lel to incorporate the industry	y-approved ali	gnment revisions. Note	that the	e purpose of the FMAG is to maintain the NERC Reliability Functional Model and the
asso	ciated Technical Documents	at the directio	n of the Standards Com	nmittee (SC) to ensure the model correctly reflects the industry today and evaluates and
inco	rporates new and emergent r	eliability relat	ed tasks. The drafting t	eam high	nly encourages you to attend the next Project 2015-04 meeting which will focus on
deve	elopment of the Phase 2 reco	mmendations			
28	Dan Wilson –	5		Yes	
	PPL Electric Utilities				
	Corporation				
SDT	response:				
29	Yvonne McMackin –	4		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
30	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
31	Alex Ybarra –	5		Yes	
·	I .			1	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	<u>response</u> :				
32	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".
					Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
	emmendations. The drafting to emmendations. Andrew Gallo –	eam encoura	ges you to attend the no	Yes	ct 2015-04 meeting which will focus on development of the Phase 2
CDT	Austin Energy				
ועצ	<u>response</u> :				
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
SDT	response:				
35	Yuguang Xiao – Manitoba Hydro	5		No	
SDT	response:				
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	
SDI	<u>response</u> :				
Pha "Fac	se 1 of this project. Addition	ally, the drafti	ng team notes that as	part of Ph	Reclamation does not agree with the drafting team's proposed incorporation of the term "Facilities" into the NERC Glossary definitions of Generator Operator and Generator Owner. As noted by the drafting team, the definition of "Facilities" is ambiguous and in need of revision. Reclamation recommends that the terms Generator Operator and Generator Owner be placed in Category 2 and remain unchanged until the definition of Facility is improved so the impacts of the change in definition can be better understood. t, the drafting team believes it appropriate to align the existing definitions as part of ase 2, the team will submit a SAR recommending revisions to the definition of team meeting, which will focus on development of the SAR and Phase 2
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<u>SDT</u>	<u>response</u> :				
40	Manon Paquet – On Behalf of: Roger	1, 5		No	Considering the definition of Facility given in the Glossary, a TO owning a synchronous condenser or a shunt compensator, which generates Mvars, could

SDT response: The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Owner (GO) in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GO in the NERC Glossary only relates to *who* must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GO. That is, the same entities that would meet the current definition of GO would also meet the revised definition.



#	Commenter Organization	Segment	Group name	Y/N	Comment
	•	•			mit a SAR recommending revisions to the definition of "Facility." The drafting team cus on development of the SAR and Phase 2 recommendations.
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
SDT	response:	•			
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	
SDT	response:				
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
reco		lefinition of "F	acility." The drafting to		rafting team notes that as part of Phase 2, the team will submit a SAR y encourages you to attend the next Project 2015-04 meeting which will focus on
44	Kathleen Black – DTE Energy	3,4,5		No	Agree with PSEG comments.
SDT	response:				
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
reco	response: Thank you for you	lefinition of "F	acility." The drafting to		rafting team notes that as part of Phase 2, the team will submit a SAR y encourages you to attend the next Project 2015-04 meeting which will focus on
46	Jared Shakespeare –	1		Yes	



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Peak Reliability				
SDT	<u>response</u> :				
47	Tony Eddleman –	3		Yes	
	Nebraska Public Power				
	District				
SDT	response:			_	
48	Bernard Johnson –	5		Yes	
70	Oglethorpe Power			103	
	Corporation				
CDT	·				
301	<u>response</u> :				
49	Colby Bellville –	1,3,5,6	Duke Energy	Yes	
	Duke Energy				
SDT	response:				
50	Andrea Jessup –	1,3,5,6		Yes	
	Bonneville Power	,-,-,			
	Administration				
SDT	response:			<u> </u>	
301	тезропзе.				

End of Report



Consideration of Comments Term 20: Interchange Authority

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 20: Interchange Authority

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 20: Interchange Authority (redline)

Interchange Authority:

The responsible entity that authorizes <u>the</u> implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures communication of Interchange information for reliability assessment purposes.

The SDT is recommending errata changes to both the Glossary and ROP definitions, as follows:

- (1) For the Glossary, add the word "the" to align with the ROP definition.
- (2) For the ROP, remove the "s" from "communications" to align with the Glossary definition.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment			
1	John Fontenot – Bryan Texas Utilities	1		Yes				
SDT	SDT response:							
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes				
SDT	response:							
3	Leonard Kula – Independent Electricity System Operator	2		Yes	While we agree with adding the word "the" to the definition, the definition itself is not consistent with that in the Functional Model. We commented on the SAR to suggest that there needs to be total consistency between all fundamental documents within NERC. We therefore suggest the SDT to revise the Functional Model, or to adopt the definition provided in the			
6D =	The day of		116		Functional Model in the NERC Glossary and the RoP.			

<u>SDT response</u>: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the



#	Commenter Organization	Segment	Group name	Y/N	Comment
incor		eliability relat	ed tasks. The drafting		C) to ensure the model correctly reflects the industry today and evaluates and ly encourages you to attend the next Project 2015-04 meeting which will focus on
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:				
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
SDT	response:	1		<u>'</u>	
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:				
7	Thomas Foltz – AEP	5		Yes	
SDT	response:				
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:				
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:				
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	



			_		
#	Commenter Organization	Segment	Group name	Y/N	Comment
SDT	response:				
					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	[1] Regarding communication, suggest revising the definition to read: The responsible entity that authorizes the implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures the communication of Interchange information for reliability assessment purposes. [2] "Interchange Coordinator" would be more a more consistent title to be used with the definition. A "Coordinator" can authorize. We recognize that this is a substantive change that must be addressed.
SAR, the diden	the drafting team revisions v drafting team proposed revisi	vere limited t ng the Glossa Ild be address	to alignment of the exist. ary definition to align wit sed by a development propertion	ing langu th the ex	ns are outside of the permissible scope of work for this project. As outlined in the uage of the Glossary and ROP cross-over terms. For the term Interchange Authority, sisting definition in the ROP. However, to the extent that you believe the issues ne drafting team encourages you to submit a SAR outlining the issues and your
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
SDT	response:				
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
SDT	response:				
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	response:				
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition.

August 2015



#	Commenter Organization	Segment	Group name	Y/N	Comment
					 [1] For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with "The entity that" rather than "The responsible entity that". [2] It is unclear if the Interchange Authority definition needs to remain in the Glossary given NERC actions taken earlier this year to remove Interchange Authorities from the NERC Compliance Registry. However, we recognize that removal of the term from the Glossary may be beyond the scope of this project.

SDT response:

[1] Thank you for your comments. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.

[2] The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the RBR Petition. Nevertheless, the defined term "Interchange Authority" remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.

During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.

l					
	16	Jared Shakespeare –	1	No	This terms should be retired as its no longer a registered function.
		Peak Reliability			

<u>SDT response</u>: Thank you for your comment; however, retiring the definition is outside the scope of work for this project. The drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. The drafting team notes that the Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the <u>RBR Petition</u>. Nevertheless, the defined term "Interchange Authority" remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not



#	Commenter Organization	Segment	Group name	Y/N	Comment				
in fa Duri as a	enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards. During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.								
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.				
SDT	response: Please see the dra	ifting team re	sponse to comments s	ubmitted	by the Southwest Power Pool.				
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort,				



Commenter	Segment	Group name	Y/N	Comment
Organization				
				particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
response: Please see the dra	fting team res	sponse to your commen	t for Ter	m 4: Blackstart Resource.
John Allen – City Utilities of Springfield, Missouri	4		Yes	
response:				
Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
response:				
Lee Schuster – Duke Energy	3		Yes	
response:				
Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
response:				
Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
	response: Please see the dra John Allen — City Utilities of Springfield, Missouri response: Jeremy Voll — Basin Electric Power Cooperative response: Lee Schuster — Duke Energy response: Si Truc Phan — Hydro-Quebec TransEnergie response: Christina Bigelow — Electric Reliability Council of Texas, Inc.	John Allen -	Tesponse: Please see the drafting team response to your comment of the provided HTML of the p	John Allen -

<u>SDT response</u>: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and



#	Commenter Organization	Segment	Group name	Y/N	Comment		
	porates new and emergent ropment of the Phase 2 recor	•		team high	ly encourages you to attend the next Project 2015-04 meeting which will focus on		
24	Heather Morgan – EDP Renewables North America LLC	5		Yes			
SDT	response:			·			
25	Shawna Speer – Colorado Springs Utilities	1		Yes			
SDT	response:			·			
outlin	ned in the SAR, the drafting t	eam revisions	were limited to alignn	nent of the	The NERC Functional Model changed the Interchange Authority to Interchange Coordinator noting it better reflects the nature of the entity. Additionally, the NERC Functional Model defines the Interchange Coordinator as "The functional entity that ensures communication of Arranged Interchange for reliability evaluation purposes and coordinates implementation of valid and balanced Confirmed Interchange between Balancing Authority Areas." FEUS recommends ensuring the Functional Model, RoP, and Glossary are all in alignment. Unctional Model fall outside the permissible scope of the work for this project. As a existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of the ommittee that the Functional Model Advisory Group (FMAG) update the Functional		
Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes			
SDT	response:						
28	Yvonne McMackin –	4		Yes			



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
29	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
30	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
31	Mike Smith –	1		Yes	
	Manitoba Hydro				
SDT	response:				
32	Andrew Gallo –	6		Yes	
	Austin Energy				
SDT	response:				
33	Rachel Coyne –	10		Yes	
	Texas Reliability Entity,				
	Inc.				
SDT	response:				
34	Yuguang Xiao –	5		Yes	
	Manitoba Hydro				
SDT	response:	<u> </u>			



#	Commenter Organization	Segment	Group name	Y/N	Comment
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				
36	Martin Boisvert – Hydro-Quebec	1		Yes	
	TransEnergie				
SDT	response:				
37	Erika Doot –	5		Yes	
	U.S. Bureau of Reclamation				
SDT	response:				
38	Jason Smith –	2	SPP Standards	Yes	
	Southwest Power Pool, Inc. (RTO)		Review Group		
SDT	response:			·	
39	Manon Paquet –	1, 5		Yes	
	On Behalf of: Roger Dufresne, Hydro-Quebec				
	Production				
SDT	<u>response</u> :				
40	Robert A. Schaffeld – Southern Company -	1		Yes	
	Southern Company				
	Services, Inc.				
SDT	<u>response</u> :				
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators -	Yes	
	ACES FOWER IVIAIREURING		Terms Project		



#	Commenter	Segment	Group name	Y/N	Comment			
SDT	Organization response:							
301	<u>Juli response</u> .							
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes				
SDT	SDT response:							
43	Kathleen Black – DTE Energy	3,4,5		Yes				
SDT	response:							
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes				
SDT	response:							
		<u> </u>						
45	Jared Shakespeare – Peak Reliability	1		Yes	Is the IA definition still needed if the risk-based registration project did away with it?			
the Eenfo that Relia	SDT response: The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the RBR Petition. Nevertheless, the defined term "Interchange Authority" remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards. During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.							
46	Tony Eddleman – Nebraska Public Power District	3		Yes				
SDT	response:			,				
47	Bernard Johnson –	5		Yes				
	Project 2015-04 - Alignment of	f Torms Consid	loration of Commonts					



#	Commenter Organization	Segment	Group name	Y/N	Comment			
	Oglethorpe Power							
	Corporation							
SDT	<u>response</u> :							
48	48 Colby Bellville – 1,3,5,6 Duke Energy Yes While Duke Energy agrees that the proposed alignment appears correct, we see Justification on the necessity of aligning this term since FERC has approved the removal of Interchange Authority from the Compliance Registry.							
	SDT response: The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in							

<u>SDT response</u>: The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the <u>RBR Petition</u>. Nevertheless, the defined term "Interchange Authority" remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.

During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.

49	Andrea Jessup – Bonneville Power Administration	1,3,5,6	Yes	
SDT response:				
50	Steven Rueckert – Western Electricity Coordinating Council -	10	Yes	I agree with the revisions, but question the need for the term. FERC recently approved deregistration of all PSE and IA entities. Was there any thought given to deleting the term rather than modifying it?

SDT response: Thank you for your comment; however, retiring the definition is outside the scope of work for this project. The drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. The drafting team notes that the Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the <u>RBR Petition</u>. Nevertheless, the defined term "Interchange Authority" remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				

During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.

End of Report



Consideration of Comments Term 24: Interconnected Operations Service

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 24: Interconnected Operations Service

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

-						
Group Member Name	Entity	Region	Segments			
Joseph Smith	Public Service Electric and Gas	RFC	1			
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3			
Tim Kucey	PSEG Fossil LLC	RFC	5			
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6			

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	N/A	1,3,5,6	
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	SERC	1,3	
Angela Park	SERC	1,3	
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	SERC	1,3	
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	NPCC	5	

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	NPCC	8	
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	NPCC	5	
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NPCC	5	
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.		1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative		1
Chip Koloini Golden Spread Electric Cooperative, Inc.		SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 24: Interconnected Operations Service (redline)

Interconnected Operations Service:

A service (exclusive of basic energy and transmission Transmission Services Services) that is required to support the reliable Reliable Operation Operation of Interconnected Bulk Electric Systems.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms "Transmission Services" and "Reliable Operation" because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	response:								
3	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	SDT response:								
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes					
SDT	response:	SDT response:							



				1 -	•
#	Commenter Organization	Segment	Group name	Y/N	Comment
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
SDT	response:				
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:				
7	Thomas Foltz – AEP	5		Yes	
SDT	response:				
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	<u>response</u> :				
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:				
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
SDT	response:				
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	Yes	
SDT	<u>response</u> :				
12	Joe O'Brien –	6		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	NiSource - Northern Indiana Public Service Co.				
SDT	response:				
<u>351</u>	<u>гезропае</u> .				
13	Andrew Pusztai –	1		Yes	
	American Transmission				
	Company, LLC				
SDT	response:				
14	Matthew Beilfuss –	3,4,5,6		Yes	
	WEC Energy Group, Inc.				
SDT	response:			•	
					
15	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary
	Tennessee Valley	, , ,			definition.
	Authority				
	,				The IOS definition appears to have been taken from a NERC reference document
					that was developed in 2001 and filed with FERC under docket No. RM01-12,
					Electricity Market Design and Structure. It is a vague definition, and since it is
					used in the definition of Generator Operator, also impacts that definition. We
					suggest the SDT consider drafting a SAR to improve the clarity and content of the
					IOS definition.
SDT	response: Thank you for you	r comments:	however the drafting t	team did r	not identify Interconnected Operations Service as one of the terms for which it will
			· · · · · · · · · · · · · · · · · · ·		ments should be addressed by a development project, the drafting team
	•	•		•	mendations for resolving those issues.
Crico	randges you to subtilit a start	Judining the i	ssues una your propos	cu recom	mendations for resolving those issues.
16	Jared Shakespeare –	1		Yes	
10	Peak Reliability	_		163	
SDT	response:				
301	response.				
17	Kaleb Brimhall –	5	Colorado Springs	Yes	We support the Comments Submitted by the Southwest Power Pool.
	Colorado Springs Utilities		Utilities		
SDT		fting team res	sponse to comments su	ubmitted	by the Southwest Power Pool.
		_			



#	Commenter	Sogmont	Group name	Y/N	Comment
#	Organization	Segment	Group name	1/10	Comment
1.0	_	2		NIa	The also fourth a consent with the consent NA/hile was a grown sixty the effects of the
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this
	Whateomenic 130, me.				appears to be just the start of a much wider effort that will provide little benefit
					and additional churn of the standards just when we are trying to stabilize them.
					and additional chain of the standards just when we are trying to stabilize them.
					From a standards process perspective, we had concerns with the SAR and the
					meeting notes from the team. The "Detailed Description" section of the SAR says
					it is a non-exhaustive, illustrative listing of the types of work that will be
					undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes
					imply a next step is to go through the standards and in cases where there is a
					lower case word or phrase used that happens to be spelled the same as a defined
					term, to make these capitalized terms. There typically is a very conscious decision
					by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.
					term to a defined one changes the standard.
					A simple solution that doesn't change the intent of standards or the Rules is to
					create a NERC master glossary that puts a parenthetical after the term on
					whether it is a Standards or RoP (or any other source document) term. Even if
					NERC were to align terms in every single document, you will have different
					definitions between NERC, FERC, IEEE, NAESB, and other overlapping
					organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort,
					particularly when you look at how this is broken up into dozens of ballots. It's just
					not clear how this is helping and what will be the next project tackled by the
					team.
SDT	<u>response</u> : Please see the dra	fting team res	sponse to your commen	t for Ter	m 4: Blackstart Resource.
19	John Allen –	4		Yes	
	City Utilities of				
	Springfield, Missouri				
SDT	response:				
20	Jeremy Voll –	3		Yes	
20	Jerenny von –) 3		162	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Basin Electric Power				
	Cooperative				
SDT	response:				
21	Lee Schuster –	3		Yes	
	Duke Energy				
SDT	<u>response</u> :			_	
22	Si Truc Phan –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	<u>response</u> :				
23	Christina Bigelow –	2	IRC Standards	Yes	Comments provided in the attached file.
	Electric Reliability Council		Review Committee		
	of Texas, Inc.				
SDT	<u>response</u> : The drafting team	did not receiv	ve additional comments		
24	Heather Morgan –	5		Yes	
	EDP Renewables North				
	America LLC				
SDT	response:				
25	Shawna Speer –	1		Yes	
	Colorado Springs Utilities				
SDT	response:				
26	Linda Jacobson-Quinn –	3		Yes	
	City of Farmington				
SDT	response:				
27	Dan Wilson –	5		Yes	
		1	ı	1	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	PPL Electric Utilities				
	Corporation				
SDT	response:				
28	Yvonne McMackin –	4		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:			<u>'</u>	
29	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
30	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
31	Mike Smith –	1		Yes	
	Manitoba Hydro				
SDT	response:				
32	Andrew Gallo –	6		Yes	
	Austin Energy				
SDT	response:				
33	Rachel Coyne –	10		Yes	
	Texas Reliability Entity,				
	Inc.				
SDT	response:				
וטנ	response.				



Commenter Organization	Segment	Group name	Y/N	Comment
Yuguang Xiao – Manitoba Hydro response:	5		Yes	
-	1	Exelon Utilities	Yes	
Exelon				
response:				
Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
response:				
Erika Doot – U.S. Bureau of Reclamation	5		Yes	
response:				
Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We agree with the alignment. However either here or in phase 2, the reference to "interconnected Bulk Electric Systems" seems confusing. Is the service referring to "multiple" Bulk Electric Systems within an interconnection or is there only "one" Bulk Electric System in the interconnection? Or is it one Bulk Electric System with multiple interconnections? Perhaps the definition should refer to "Reliable Operation of the interconnected Bulk Electric System." Please review.
	Yuguang Xiao — Manitoba Hydro response: Chris Scanlon — Exelon response: Martin Boisvert — Hydro-Quebec TransEnergie response: Erika Doot — U.S. Bureau of Reclamation response: Jason Smith — Southwest Power Pool, Inc. (RTO)	Yuguang Xiao — 5 Manitoba Hydro response: Chris Scanlon — 1 Exelon response: Martin Boisvert — 1 Hydro-Quebec TransEnergie response: Erika Doot — 5 U.S. Bureau of Reclamation response: Jason Smith — 2 Southwest Power Pool, Inc. (RTO)	Yuguang Xiao —	Yuguang Xiao — 5 Yes Manitoba Hydro response: Chris Scanlon — 1 Exelon Utilities Yes Exelon response: Martin Boisvert — 1 Yes Hydro-Quebec TransEnergie response: Erika Doot — 5 Yes U.S. Bureau of Reclamation response: Jason Smith — 2 SPP Standards Review Group

<u>SDT response</u>: The drafting team appreciates your comments and believes that the definition could be more clear. However, the proposed revisions fall outside the permissible scope of work for this project. As part of Phase 1 for this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP ("cross-over terms"), and to the extent there were definitional differences, proposed alignment revisions where appropriate. For the term IOS, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. It is important to point out that the revisions were limited to alignment – the drafting team simply revised the Glossary definition by adopting the existing language in the ROP definition. If you believe



#	Commenter Organization	Segment	Group name	Y/N	Comment			
Auth	revisions should be made to the definition of IOS to clarify the reference to the "interconnected BES," the drafting team suggests submitting a Standards Authorization Request (SAR) outlining how the existing language could be revised to provide greater clarity regarding the intended meaning and definition application.							
Elect	tric System (BES) and Bulk Po ss usage of the terms BES and	wer System (BPS). During Phase 2, t	he draftir	of questions were raised regarding inconsistent or improper usage of the terms Bulking team will consider recommending that an effort is undertaken to review and ossary, and ROP to ensure proper usage and application given the particular			
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes				
SDT	response:							
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes				
SDT	response:							
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	[1] This term should either end with "an Interconnection" or "the Bulk Electric System" (singular). This alignment should be made to the ROP as well. [2] Also, Transmission Services by NERC definition, implies ancillary services are included since it involves "servicesto move energy from a Point of Receipt to a Point of Delivery." The FERC pro forma tariff requires a number of ancillary services including reactive supply, voltage control imbalance, regulation, frequency response, and operating reserve, which may be required "to move energy from a Point of Receipt to a Point of Delivery." Thus, by capitalizing Transmission Service, the definition changes the meaning of Interconnected Operations Service, and may change the meaning by excluding all Ancillary Services. The application of the requirements that use this term may also be altered.			



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	response:			1.6	
	•	•			ion could be clearer. However, the proposed revisions fall outside the permissible
-					team identified all existing defined terms that are contained in both the Glossary
	· · · · · · · · · · · · · · · · · · ·	• 1			ferences, proposed alignment revisions where appropriate. For the term IOS, the
					ng definition in the ROP. It is important to point out that the revisions were limited obting the existing language in the ROP definition. The drafting team did not have
					n the existing definition language in the Glossary and ROP. If you believe revisions
					nnected BES," the drafting team suggests submitting a Standards Authorization
			•		greater clarity regarding the intended meaning and definition application.
	and the second s	G Taribud	of some so revided to	p. o mac	B. 22.22. 2.2, 1202. 2 and an analysis and activities approaches
[2]	t is the position of the draftir	ng team that th	e revision alignments t	o the de	finition of "Interconnected Operations Service" do not impact Ancillary Services. The
	•				term is only used in other Glossary definitions). Additionally, the term "Ancillary
	ice" appears in only once in			-	
42	Andy Bolivar –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	response:				
43	Kathleen Black –	3,4,5		Yes	
	DTE Energy				
SDT	response:				
44	Jennifer Losacco –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	response:				
44	Jared Shakespeare –	1		Yes	
	Peak Reliability				
SDT	response:				



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
45	Tony Eddleman –	3		Yes	
	Nebraska Public Power				
	District				
SDT	response:				
46	Bernard Johnson –	5		Yes	
	Oglethorpe Power				
	Corporation				
SDT	response:				
47	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests replacing "interconnected Bulk Electric System" with "the Bulk-Power System".
					The NERC-defined term "Reliable Operation" includes Bulk-Power System in the definition, and we believe using the NERC-defined term "Bulk-Power System" is a better way to state "interconnected Bulk Electric Systems" since the definition of Bulk-Power System includes:
					"A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof);"
of P the Glos simp draf	hase 1 for this project, the drack there were definition as any definition to align with toly revised the Glossary definiting team suggests submitting team for the Glossary definition ally, the drafting team notice that the Gloss was usage of the terms BES and sexting team of the terms BES and sexting the terms between the terms are the ter	afting team id I differences, he existing de ition by adopt g a Standards otes that durin wer System (I	entified all existing define proposed alignment reversions in the ROP. It is sing the existing language Authorization Request (and the Phase 1 work, and BPS). During Phase 2, the	ned term visions w importa e in the SAR) ou umber of e draftir	roposed revisions fall outside the permissible scope of work for this project. As part as that are contained in both the Glossary and the ROP ("cross-over terms"), and to there appropriate. For the term IOS, the drafting team proposed revising the ant to point out that the revisions were limited to alignment – the drafting team ROP definition. If you believe revisions should be made to the definition of IOS, the tlining any perceived issues or proposed revisions to the definition. of questions were raised regarding inconsistent or improper usage of the terms Bulking team will consider recommending that an effort is undertaken to review and ossary, and ROP to ensure proper usage and application given the particular
		1			
48	Andrea Jessup –	1,3,5,6		Yes	



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
	Bonneville Power						
	Administration						
SDT	SDT response:						

End of Report



Consideration of Comments Term 25: Interconnection

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 25: Interconnection

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 25: Interconnection (redline)

Interconnection:

A geographic area in which the operation of Bulk Power System components is synchronized such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system to maintain Reliable Operation of the Facilities within their control. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.

The SDT is proposing revisions to both the Glossary and ROP definitions (effective no earlier than July 1, 2016). The ROP definition is broader than the Glossary because it provides a description of what constitutes an interconnection, as opposed to identifying the specific geographical areas in North America that currently constitute an interconnection. The ROP definition tracks the Federal Power Act (note it is marked with ++ indicating such). Because the Glossary limits application of the definition to the specific interconnections identified therein, it could be perceived as intended to be more limiting and/or intentionally different than the ROP definition. In order to align the two definitions, without losing the clarity provided by the FERC-approved Glossary definition, which specifically identifies the current Interconnections in North America, the SDT is proposing to combine the two definitions. However, because the recently FERC-approved Glossary definition is not effective until July 1, 2016, the SDT is proposing that the alignment revisions do not take effect until July 1, 2016, at the earliest.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	response:				
2	Kathy Caignon – City of Vineland	3		Yes	
SDT	<u>response</u> :				
3	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	No	Recommend that this term be moved to Phase 2 so that the SDT can work on improving the definition. By stating a geographic area within the proposed definition, it implies that all Standards that are used within an Interconnection



#	Commenter Organization	Segment	Group name	Y/N	Comment
					would be applied to any system that has separated from other synchronized entities (has islanded themselves). All BA standards would then need to be enforced. This will increase the islanded entity's risk of complying with all Interconnection Requirements if they do become islanded.
					With the use of Bulk Power System and to maintain Reliable Operation of the Facilities in the same sentence, the Project Team is sending mixed signals. The term "Facility" is directly related to the BES definition where the Bulk Power System includes the distribution of energy to end use customers, mostly outside the scope of the NERC Reliability Standards

<u>SDT response</u>: The proposed alignment revisions do not affect functional entity registration. The drafting team notes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team *highly* encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.

4	Leonard Kula – Independent Electricity System Operator	2	N	No	We agree with the first part of the proposed addition to clarify the synchronized operation condition but not the qualifier on the reliable operation part, which is the fundamental objective of the Reliability Standards but not required to describe an Interconnection. We therefore suggest the definition be stated as:
					A geographic area in which the operation of Bulk Power System components is synchronized. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.

SDT response: Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team proposed combining the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team *highly* encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.



				N.					
#	Commenter Organization	Segment	Group name	Y/N	Comment				
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes					
SDT	SDT response:								
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes					
SDT	response:								
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		No	Within an Interconnection, Elements and resources may be operated asynchronously as well. We propose:				
					"The System of Bulk Power System components that are operated asynchronously to other Systems of Bulk Power System components."				
draft defir tean deve	ting team proposed combining team proposed combining it is not propose substantive eloping a SAR to revise the declop a SAR, the SAR will be su	ng the language cause the SAR language revision of Intumited to the	ge from the Glossary and limits this drafting tear visions (other than align erconnection to address e Standards Committee	d ROP den to aligrement reverse the issues (SC) in a	lage of the Glossary and ROP cross-over terms. For the term Interconnection, the finitions into one aligned definition. The drafting team recognizes that the aligned ament of the existing language in the Glossary and ROP definitions, the drafting visions). However, as part of Phase 2 for this project, the drafting team will consider les identified by team members and various commenters. If the team does decide to accordance with the procedure outlined in the Standards Process Manual. The lang which will focus on development of the SAR and Phase 2 recommendations.				
8	Thomas Foltz – AEP	5		Yes					
SDT	response:								
9 <u>SDT</u>	Dennis Minton – Florida Keys Electric Cooperative Assoc. <u>response</u> :	1		Yes					
10	Rob Collins –	1, 6, 5, 3		No	For Phase 1, Vectren proposes not to align the ROP and the NERC Glossary definition of Interconnection since Bulk Power System components can be				



#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.				asynchronous. We also propose not specifying in the definition, 'When capitalized'.
					Vectren would like to include this term in Phase 2 so the SDT can create a more appropriate definition.
lang of P mei pro	guage in the Glossary and ROP hase 2 for this project, the dra mbers and various commente	definitions, to definitions, to definitions, to definition with the team of th	the drafting team did no vill consider developing and does decide to develop fanual. The drafting tear	t propos SAR to a SAR, t	reproved. Because the SAR limits this drafting team to alignment of the existing se substantive language revisions (other than alignment revisions). However, as par revise the definition of Interconnection to address the issues identified by team the SAR will be submitted to the Standards Committee (SC) in accordance with the encourages you to attend the next Project 2015-04 meeting which will focus on
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
SDT	response:				
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	The Glossary definition should align with the RoP; however, "system" should be changed to "Bulk Power System": "Interconnection" means a geographic area in which the operation of Bulk Power System components is synchronized such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system Bulk Power System to maintain Reliable Operation of the Facilities within their control
					Concerned with the phrasing "When capitalized" When defined terms are used in Reliability Standards, they are capitalized as an indication that the term is defined in the Glossary of Terms. By utilizing the caveat that the definition is specific "when capitalized" it could only ever be defined as "any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec" in a Reliability Standard. Otherwise it would not be capitalized and therefore an undefined term in the Reliability Standard. Suggest removing "When

capitalized" and identify specifically or rely on context when the four major



#	Commenter Organization	Segment	Group name	Y/N	Comment			
					electric system networks in North America are intended.			
					We agree with the first part of the proposed addition to clarify the synchronized operation as a defining characteristic of an Interconnection, but do not support the additional qualifiers regarding failures and reliable operation. The additional language could be read as creating one all-inclusive interconnection because, for example, the failure of one component in the Quebec Interconnection may have adverse effects in the Eastern Interconnection.			
					ons are outside of the permissible scope of work for this project. As outlined in the uage of the Glossary and ROP cross-over terms. For the term Interconnection, the			
defir tean deve to de	drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.							
13	Joe O'Brien – NiSource - Northern	6		No	This is a disjointed definition which makes little or no sense and needs to either be completely rewritten or dropped from the glossary altogether			
	Indiana Public Service Co.				The final physics (southernes is just him d of housing out there			
tean align addr Com	SDT response: Thank you for your comments. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.							
14	Andrew Pusztai –	1		Yes				
	American Transmission							
SDT	Company, LLC							
301	SDT response:							



				1	
#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
15	Matthew Beilfuss –	3,4,5,6		No	The proposed change adds complexity to the term's definition, which may have a
	WEC Energy Group, Inc.				significant impact on other references to the term within the glossary. As an
					example, temporarily islanded areas would meet the definition of an
					Interconnection, which does not meet the intent of the term or its common
					usage. The simple definition pending FERC approval is preferable.
	.		· · · · · · · · · · · · · · · · · · ·		cted to combine the language from the Glossary and ROP definitions into one aligned
		· •			nproved. Because the SAR limits this drafting team to alignment of the existing
_			——————————————————————————————————————		se substantive language revisions (other than alignment revisions). As part of Phase
2 for	r this project, the drafting tea	ım will consid	er developing a SAR to	revise th	e definition of Interconnection to address the issues identified by team members
and	various commenters. If the t	eam does ded	cide to develop a SAR, t	he SAR v	vill be submitted to the Standards Committee (SC) in accordance with the procedure
outli	ined in the Standards Process	Manual. The	drafting team highly er	ncourage	es you to attend the next Project 2015-04 meeting which will focus on development
of th	ne SAR and Phase 2 recomme	ndations.			
16	Dennis Chastain –	1,3,5,6		Yes	
	Tennessee Valley	,-,-,-			
	Authority				
SDT	response:				
<u></u>					
17	Jared Shakespeare –	1		No	We recommend removing the quotes around "wires" as it seems odd to have
	Peak Reliability	1		''	quotes in a definition. Also, Is the DP definition still needed if the risk-based
	T can remainity				registration project did away with it?
SDT	response: Thank you for your	r comments '	Landrafting team agree	oc that th	here should be consistency in the use of "quotes" throughout the NERC defined
	.				mendations to prevent future misalignment or inconsistencies in NERC defined
				•	to the issue raised in your comments. The drafting team will provide its Phase 2
	and the state of t	•	——————————————————————————————————————		· · · · · · · · · · · · · · · · · · ·
					ecision of the SC and NERC regarding how to best proceed with the
	· · · · · · · · · · · · · · · · · · ·	eam encoura	ges you to attend future	Project	2015-04 meetings which will focus on development of these Phase 2
reco	mmendations.				
		1			
18	Kaleb Brimhall –	5	Colorado Springs	No	We support the Comments Submitted by the Southwest Power Pool.
	Colorado Springs Utilities		Utilities		
SDT	response: Please see the dra	fting team res	sponse to comments su	bmitted	by the Southwest Power Pool.
19	Terry Bilke –	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the
	Midcontinent ISO, Inc.				team and are generally don't have concerns with the definitions presented, this
	<u>'</u>	1	ı		



#	Commenter Organization	Segment	Group name	Y/N	Comment
SDT	The state of the s	fting to an extended		t for Tor	appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
<u>SDT</u>	response: Please see the dra	fting team res	ponse to your commer	nt for Ter	m 4: Blackstart Resource.
20	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group
SDT	response: Please see the dra	fting team res	ponse to the SPP Stand	lards Rev	riew Group.
21	Jeremy Voll – Basin Electric Power Cooperative	3		No	Recommend that this term be moved to Phase 2 so that the SDT can work on improving the definition. By stating a geographic area within the proposed definition, it implies that all Standards that are used within an Interconnection



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#	Commenter Organization	Segment	Group name	Y/N	Comment		
					would be applied to any system that has separated from other synchronized entities (has islanded themselves). All BA standards would then need to be enforced. This will increase the islanded entity's risk of complying with all Interconnection Requirements if they do become islanded. With the use of Bulk Power System and to maintain Reliable Operation of the Facilities in the same sentence, the Project Team is sending mixed signals. The		
					term "Facility" is directly related to the BES definition where the Bulk Power System includes the distribution of energy to end use customers, mostly outside the scope of the NERC Reliability Standards.		
lang 2 for and outl	definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.						
22	Lee Schuster – Duke Energy	3		No			
SDT	response:						
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes			
SDT	response:			·			
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC agrees with the first part of the proposed addition to clarify the synchronized operation as a defining characteristic of an Interconnection, but does not support the additional qualifiers regarding failures and reliable operation. These qualifiers are not essential to the definition of an Interconnection. It further suggests that, following consideration of the proposed modifications to the definition of Bulk Power System, use of the term Bulk Electric System is more appropriate. The SRC therefore suggests the definition be stated		



#	Commenter Organization	Segment	Group name	Y/N	Comment			
					as:			
					A defined geographic area within which the operation of Bulk Electric System components is synchronized. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.			
					To the extent that the SDT views this recommendation as a substantive change to the definitions, the SRC would request that this revision be addressed the later, proposed phases of this project or as noted below as part of specific standard revision processes.			
of w tern draf Glos this vario outl of th	SDT response: Thank you for your comments; however, as noted in your comments, the proposed revisions are substantive and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.							
25	Heather Morgan – EDP Renewables North America LLC	5		Yes				
SDT	response:							
26	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities			
SDT	SDT response: Please reference the drafting team response to the comments of Colorado Springs Utilities.							
27	Linda Jacobson-Quinn – City of Farmington	3		Yes				
SDT	response:							
28	Dan Wilson –	5		Yes				



PPL Electric Utilities Corporation	#	Commenter	Segment	Group name	Y/N	Comment				
Corporation SDT response:					•					
SDT response: 29 Yvonne McMackin -		PPL Electric Utilities								
29 Yvonne McMackin - 4 Yes Yes		Corporation								
Public Utility District No. 2 of Grant County, Washington SDT response: 30 Michiko Sell – 1 Yes Public Utility District No. 2 of Grant County, Washington SDT response: 31 Alex Ybarra – 5 Yes Public Utility District No. 2 of Grant County, Washington SDT response: 32 Mike Smith – 1 No Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility", Sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	SDT									
SDT response: 30 Michiko Sell – Public Utility District No. 2 of Grant County, Washington SDT response: 31 Alex Ybarra – Public Utility District No. 2 of Grant County, Washington SDT response: 32 Mike Smith – Manitoba Hydro Manitoba Hydro No Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	29	Public Utility District No. 2 of Grant County,	4		Yes					
Public Utility District No. 2 of Grant County, Washington SDT response: 31 Alex Ybarra - Public Utility District No. 2 of Grant County, Washington SDT response: 32 Mike Smith - Manitoba Hydro No Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	SDT									
31 Alex Ybarra — Public Utility District No. 2 of Grant County, Washington SDT response: 32 Mike Smith — Manitoba Hydro No Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	30	Public Utility District No. 2 of Grant County,	1		Yes					
Public Utility District No. 2 of Grant County, Washington SDT response: No Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	SDT	response:								
SDT response: 32 Mike Smith — 1 No Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	31	Public Utility District No. 2 of Grant County,	5		Yes					
Manitoba Hydro suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions	SDT	response:								
	32		1		No	suffixes. For defined term "Facility", sometimes referenced as "Facilities" and				
SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined te						Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.				

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.



#	Commenter	Segment	Group name	Y/N	Comment				
	Organization	o o go		.,					
33	Andrew Gallo – Austin Energy	6		No	Austin Energy (AE) suggests removing "such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system to maintain Reliable Operation of the Facilities within their control" and changing "Bulk Power System" to "Bulk Electric System." AE believes the qualifier is not appropriate and the term BPS provides issues for entities outside the U.S.				
proj term reco defin team team Prod	SDT response: Thank you for your comments; however, your proposed revisions are substantive in nature and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.								
34	Rachel Coyne – Texas Reliability Entity,	10		Yes					
	Inc.								
SDT	response:								
35	Yuguang Xiao – Manitoba Hydro	5		No					
SDT	response:								
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes					
SDT	response:								
37	Martin Boisvert –	1		Yes					
	Hydro-Quebec								
SDT	TransEnergie response:								
301	response.								



#	Commenter Organization	Segment	Group name	Y/N	Comment		
	Organization — — — — — — — — — — — — — — — — — — —						
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes			
SDT	SDT response:						
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	[1] We feel that there is an inconsistent use of the terms Bulk Electric System and Bulk Power System throughout the definitions in the Glossary and ROP. There is a concern that use of Bulk Power System in the definition of Interconnection could lead to increased scope in some cases. Effectively canceling out the work done to clarify the scope through the Bulk Electric System definition work. [2] There is also confusion created now due to the added text in that there seems to be two cases of use of the term: capitalized and non-capitalized. However since this is a defined term, in order to link the word to the definition, it must be capitalized. Use of the non-capitalized term means that the use is not linked to the definition as stated. To increase clarity, removal of the phrase "when capitalized" should be investigated		

SDT response:

- [1] The drafting team agrees that in the Reliability Standards, Glossary, and ROP there are instances of inconsistent or incorrect usage or application of the terms Bulk Electric System (BES) and Bulk Power System (BPS). Because the SAR limits this drafting team to alignment of the definitions in the Glossary and ROP, the team did not address this issue. However, during Phase 2 of this project, the drafting team will consider a recommendation that an effort is undertaken to assess usage of the BES and BPS throughout the Reliability Standards, Glossary, and ROP for the purpose of ensuring proper usage and application of the various terms given the particular context. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.
- [2] Thank you for your comments. The drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. The drafting team will submit the SAR to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. As indicated above, the drafting team encourages you to attend the next Project 2015-04 meeting during which time the team will develop the SAR to support future revisions to this term.



#	Commenter Organization	Segment	Group name	Y/N	Comment		
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes			
SDT	SDT response:						
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes			
SDT	response:						
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	While we are not opposed to the concept of the definition in the ROP. However, combining these two terms could be problematic because there are small hydro facilities that may be part of the Bulk Electric System that are operated at a different frequency and are asynchronous. By definition, these small hydro project would not be part of the Interconnection since they are not synchronized to the rest of the Interconnection.		
SDT response: The proposed alignment revisions do not affect functional entity registration. Additionally, the drafting team notes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.							
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes			
SDT	SDT response:						
44	Kathleen Black – DTE Energy	3,4,5		Yes			
SDT	SDT response:						



#	Commenter Organization	Segment	Group name	Y/N	Comment			
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes				
SDT	SDT response:							
46	Jared Shakespeare – Peak Reliability	1		Yes	"When capitalized, any one of the four major electric system networks in North America" should be "Currently, this term is any one of the four major electric system networks in North America." Any term that is capitalized means the defined term.			
definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations. A								
	Nebraska Public Power District							
SDT response:								
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes				
SDT response:								
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	No	Duke Energy requests additional consideration be given to the proposed definition/alignment of the term Interconnection. The proposal appears to distort an already common understanding of the concept of the lower cased term interconnection.			



#	Commenter	Segment	Group name	Y/N	Comment	
SDT response: The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.						
50	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes		
SDT response:						
51	Steven Rueckert - Western Electricity Coordinating Council	10		Yes	I voted affirmative for the definition, but wonder why the words "such that failure of one or more of such components may adversely affect the ability of the operations of other components within the system to maintain Reliable Operation of the Facilities within their control" are needed after "synchronized". While this is a true statement there are facilities within each interconnection that probably don't affect the ability of the operations of other components but they are still within the interconnection. It seems like just stopping after "synchronized" and then including the second sentence would suffice.	
SDT response: Thank you for your comments; however, your proposed revisions are substantive in nature and outside of the permissible scope of work for this						

SDT response: Thank you for your comments; however, your proposed revisions are substantive in nature and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team *highly* encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.

End of Report



Consideration of Comments Term 28: Load-Serving Entity

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 28: Load-Serving Entity

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

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Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 28: Load-Serving Entity (redline)

Load-Serving Entity:

Secures energy and <u>transmission_Transmission_service_Service</u> (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Transmission Service" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Kathy Caignon – City of Vineland	3		Yes					
SDT	SDT response:								
3	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	response:								
4	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	response:								
5	Mary Claire Yatsko –	1,3,4,5,6		Yes					



		_		•	
#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
SDT	response:				
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
SDT	response:				
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	"Schedules energy" should replaces "Secures energy" since Schedule is a defined term. Rather than "Secures energy", it would be more appropriate to use "Schedules energy" since "Schedule" is a defined term.
iden		uld be address	sed by a development p		visting definition in the ROP. However, to the extent that you believe the issues are drafting team encourages you to submit a SAR outlining the issues and your
	AEP				
SDT	<u>response</u> :				
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:				
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
SDT	response:				
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	Yes	
SDT	<u>response</u> :				
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
SDT	response:				
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
SDT	response:				
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	response:				
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition.
					[1] For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with "The entity that secures".
					[2] The LSE definition also contains another Glossary term(s) that is not capitalized. Consider changing "the electrical demand and energy requirements" to "the Electrical Energy and Demand requirements" to properly denote these other Glossary terms. It appears that their application in
					the LSE definition narrative is consistent with their Glossary meaning.



#	Commenter Organization	Segment	Group name	Y/N	Comment
					[3] It is unclear if the Load-Serving Entity definition needs to remain in the Glossary given NERC actions taken this year to remove the Load-Serving Entity from the NERC Compliance Registry. However, we recognize that removal of the term from the Glossary may be beyond the scope of this project.

SDT response:

- [1] Thank you for your comments; however, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.
- [2] The drafting team appreciates your suggestion but notes that currently the definitions are aligned. Your proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Load-Serving Entity, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to the definition of LSE to clarify the reference to "the electrical demand and energy requirements," the drafting team suggests submitting a Standards Authorization Request (SAR) outlining how the existing language could be revised to provide greater clarity regarding the intended meaning and definition application.
- [3] As acknowledged in your comment, revising the definition to remove references to Load-Serving Entity is outside the scope of work for this project. The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity from the NERC Compliance Registry, as explained in further detail in the RBR Petition and Compliance Filing, the term nevertheless remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards. During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.

17	Jared Shakespeare – Peak Reliability	1	Yes	
	1 can remaining			

SDT response:



#	Commenter Organization	Segment	Group name	Y/N	Comment
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the dra	fting team re	sponse to comments su	ubmitted l	by the Southwest Power Pool.
19 SDT	Terry Bilke – Midcontinent ISO, Inc. response: Please see the dra	2 fting team re	sponse to your comme	No No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team. m 4: Blackstart Resource.
	-	T	I	1	The Francisco Control
20	John Allen –	4		Yes	



				V/41				
#	Commenter	Segment	Group name	Y/N	Comment			
	Organization							
	City Utilities of							
	Springfield, Missouri							
SDT	<u>response</u> :							
21	Jeremy Voll –	3		Yes				
	Basin Electric Power							
	Cooperative							
SDT	response:			l				
22	Lee Schuster –	3		Yes				
	Duke Energy							
SDT	response:							
23	Si Truc Phan –	1		Yes				
	Hydro-Quebec							
	TransEnergie							
SDT	response:							
24	Christina Bigelow –	2	IRC Standards	No	The SRC has previously commented that there needs to be total consistency			
	Electric Reliability Council		Review Committee		between all fundamental documents within NERC. Thus, while it does not			
	of Texas, Inc.				disagree with the proposed changes, it recommends that the SDT take this			
					opportunity to also synchronize this definition with the Functional Model.			
					Further, the SRC recommends that the Functional Model definition be adopted in			
					lieu of the proposed revisions			
SDT i	response: Thank you for your	comments; h	nowever, modifications t	to the Fu	nctional Model fall outside the permissible scope of the work for this project. As			
outli	ned in the SAR, the drafting to	eam revisions	were limited to alignme	ent of the	e existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of			
					ommittee that the Functional Model Advisory Group (FMAG) update the Functional			
-	Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the							
			-		SC) to ensure the model correctly reflects the industry today and evaluates and			
					ly encourages you to attend the next Project 2015-04 meeting which will focus on			
	lopment of the Phase 2 recor	•						
25	Heather Morgan –	5		Yes				
	-		•	•				



ш	Communitari	Commont	6	V/NI	Commant				
#	Commenter Organization	Segment	Group name	Y/N	Comment				
	EDP Renewables North								
	America LLC								
CDT									
301	response:								
26	Shawna Speer –	1		Yes					
	Colorado Springs Utilities								
SDT	SDT response:								
27	Linda Jacobson-Quinn –	3		Yes	Corresponding changes should be included in the NERC Functional Model.				
	City of Farmington								
this p Mode associ incor	outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. Yes PPL Electric Utilities								
	Corporation								
SDT	<u>response</u> :								
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes					
SDT	response:								
30 SDT	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes					
<u> 201</u>	<u>response</u> :								



			· ·		
#	Commenter Organization	Segment	Group name	Y/N	Comment
		1	T		
31	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
32	Mike Smith –	1		Yes	
52	Manitoba Hydro	_		163	
SDT	response:				
35.	<u>100,00130</u> .				
33	Andrew Gallo –	6		Yes	
	Austin Energy				
SDT	response:				
34	Rachel Coyne –	10		Yes	
	Texas Reliability Entity,				
	Inc.				
SDT	response:				
35	Yuguang Xiao –	5		Yes	
	Manitoba Hydro				
SDT	response:				
		T			
36	Chris Scanlon –	1	Exelon Utilities	Yes	
	Exelon				
SDT	response:				
37	Martin Boisvert –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	response:				



#	Commenter	Segment	Group name	Y/N	Comment
	Organization	3cgc.ii	Group name	.,	Comment
38	Erika Doot –	5		Yes	
	U.S. Bureau of				
	Reclamation				
SDT	<u>response</u> :				
39	Jason Smith –	2	SPP Standards	Yes	We do not have issue with the stated capitalization changes to Transmission
	Southwest Power Pool,		Review Group		Service in the definition of Load-Serving Entity. However, the term "demand" is
	Inc. (RTO)				not capitalized and appears to be consistent with the defined term. We
					recommend that "demand" be reviewed in Phase 2 of this Project in order to
					determine if it needs to be capitalized. ere should be consistency in the use of capitalization throughout the NERC defined
reco deci:	mmendations for how to add	lress these iss rding how to	sues. The drafting team best proceed with the	will prov drafting to	onsider all of the capitalization issues identified during Phase 1 and develop ide its recommendations to the Standards Committee (SC) and NERC. It will be the eam recommendations. The drafting team encourages you to attend the next mmendations.
40	Manon Paquet –	1, 5		Yes	
	On Behalf of: Roger				
	Dufresne, Hydro-Quebec				
	Production				
SDT	<u>response</u> :				
41	Robert A. Schaffeld –	1		Yes	
	Southern Company -				
	Southern Company				
	Services, Inc.				
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	[1] "Demand" is a glossary term and should either be capitalized or clarified. [2] We ask the drafting team to provide more details on the implementation of this proposed change in the event that FERC approves retirement of the LSE function from the ROP.

SDT response:

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[2] Although the Risk-Based Registration initiative removed Load-Serving Entity from the NERC Compliance Registry, as explained in further detail in the RBR Petition and Compliance Filing, the term nevertheless remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.

During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.

43	Andy Polivar	1		Yes		
45	Andy Bolivar – NextEra Energy - Florida	_		165		
	Power and Light Co.					
SDT	SDT response:					
44	Kathleen Black –	3,4,5		Yes		
	DTF Energy					

SDT response:



#	Commenter Organization	Segment	Group name	Y/N	Comment		
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes			
SDT	<u>response</u> :						
46	Jared Shakespeare – Peak Reliability	1		Yes			
SDT	response:						
47	Tony Eddleman – Nebraska Public Power District	3		Yes			
SDT	response:						
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes			
SDT	response:						
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the definition, as it is currently a defined term.		
tean capir term mea addr Phas issue best	n agrees that, in general, ther talization issues were identified has the definitional meaning ning of the definition. Howevers capitalization issues if the se 2 of this project, the team ees. The drafting team will pro	re should be ored, including, g; and, capita ver, the draftile existing defiwill consider wide its recomam recomme	consistency in the use of but not limited to: capi lization of a term that is ng team revisions were initions were aligned (ar all of the capitalization inmendations to the Starndations. The drafting t	capitaliz talization a define limited to nd the ca ssues ide ndards Co	"transmission" is not used as a stand-alone term in this definition. However, the ration throughout the NERC defined terms. During the Phase 1 work, a number of of a term that is not a defined term; failure to capitalize a defined term when the d term but should not be capitalized because it does not have the intended of alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to pitalization issue was present in both the ROP and Glossary definition). As part of entified during Phase 1 and develop recommendations for how to address these formmittee (SC) and NERC. It will be the decision of the SC and NERC regarding how to ourages you to attend the next Project 2015-04 meeting which will focus on		
50	Andrea Jessup –	1,3,5,6		Yes			



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Bonneville Power				
	Administration				
SDT	response:				

End of Report



Consideration of Comments Term 31: Planning Authority

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 31: Planning Authority

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Term 31: Planning Authority



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Term 31: Planning Authority August 2015



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

August 2015

6



Question

Term 31: Planning Authority (redline)

Planning Authority:

The responsible entity that coordinates and integrates transmission facility Facilities and service plans, resource plans, and protection Protection systems.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms "Facilities" and "Protection Systems" because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	<u>response</u> :				
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	response:				
3	Leonard Kula – Independent Electricity System Operator	2		Yes	While we agree with capitalizing the words "facilities" and "protection systems", the definition is not consistent with that presented in the Functional Model. We commented on the SAR to suggest that there needs to be total consistency between all fundamental documents within NERC. We therefore suggest the SDT to revise the Functional Model, or to adopt the definition provided in the Functional Model in the NERC Glossary and the RoP.
SDT	response: Thank you for your	comments: h	nowever, modifications t	o the Fu	nctional Model fall outside the permissible scope of the work for this project. As

<u>SDT response</u>: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and



#	Commenter Organization	Segment	Group name	Y/N	Comment
	porates new and emergent r lopment of the Phase 2 recor			team highl	y encourages you to attend the next Project 2015-04 meeting which will focus on
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:				
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<u>SDT</u>	response:				
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:				
7	Thomas Foltz – AEP	5		Yes	
<u>SDT</u>	response:				
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:				
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:				
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment			
SDT	response:							
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	[1] Transmission should be capitalized. [2] Transmission Facilities should be uniquely defined. The definitions of Transmission and Facilty(ies) should not have to be merged by a reader to create the Transmission Facilities definition.			
SDT response: [1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined term. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized by it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and then the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP. Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. [2] Thank you for your comments; however, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The draft team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The team will consider the issue raised in your comments in developing the Phase 2 recommendations. To the extent believe a new defined term should be created, the team suggests that you submit a SAR.					luding, but not limited to: capitalization of a term that is not a defined term; failure capitalization of a term that is a defined term but should not be capitalized because a team revisions were limited to alignment of the <i>existing</i> definitions, and therefore itions were aligned (and the capitalization issue was present in both the ROP and ll of the capitalization issues identified during Phase 1 and develop ride its recommendations to the Standards Committee (SC) and NERC. It will be the eam recommendations. The drafting team encourages you to attend the next immendations. Important to alignment of the <i>existing</i> language of the Glossary and ROP cross-over are Glossary definition to align with the existing definition in the ROP. The drafting late confusion. During Phase 2 of this project, the drafting team will consider sue raised in your comments in developing the Phase 2 recommendations. The ch will focus on development of the Phase 2 recommendations. To the extent you			
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes				
SDT	response:							
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes				

Term 31: Planning Authority

August 2015

SDT response:



14 Matthew Beilfuss — WEC Energy Group, Inc. SDT response: 15 Dennis Chastain — Tennessee Valley Authority 16 If por form consistency with other entity type definitions contained in Glossary, we recommend starting the definition with "The entity that than "The responsible entity that". [1] We believe the definition is intended to mean that the PA is the entity or coordinates and integrates Transmission plans and resource plans with area. Transmission plans involve the planning of new Transmission facitaking committed Transmission Services into account. Additionally, the coordination of Protection Systems is typically the responsibility of the owners within the NERC standards. We recommend revising the definition to read as follows: "The entity that owners within the NERC standards."	
WEC Energy Group, Inc. SDT response: 15 Dennis Chastain — Tennessee Valley Authority 1,3,5,6 Yes For alignment purposes, we agree with the proposed change to the Glodefinition. [1] For form consistency with other entity type definitions contained in Glossary, we recommend starting the definition with "The entity that". [2] We believe the definition is intended to mean that the PA is the ent coordinates and integrates Transmission plans and resource plans with area. Transmission plans involve the planning of new Transmission fact taking committed Transmission Services into account. Additionally, the coordination of Protection Systems is typically the responsibility of the owners within the NERC standards. We recommend revising the definition to read as follows: "The entity to the owners within the NERC standards."	
SDT response: 15 Dennis Chastain — Tennessee Valley Authority 1,3,5,6 Yes For alignment purposes, we agree with the proposed change to the Glod definition. [1] For form consistency with other entity type definitions contained in Glossary, we recommend starting the definition with "The entity that". [2] We believe the definition is intended to mean that the PA is the ent coordinates and integrates Transmission plans and resource plans with area. Transmission plans involve the planning of new Transmission facitaking committed Transmission Services into account. Additionally, the coordination of Protection Systems is typically the responsibility of the owners within the NERC standards. We recommend revising the definition to read as follows: "The entity to the owners within the DERC standards."	
15 Dennis Chastain – Tennessee Valley Authority 1,3,5,6 Tennessee Valley Authority [1] For form consistency with other entity type definitions contained in Glossary, we recommend starting the definition with "The entity that" [2] We believe the definition is intended to mean that the PA is the ent coordinates and integrates Transmission plans and resource plans with area. Transmission plans involve the planning of new Transmission fact taking committed Transmission Services into account. Additionally, the coordination of Protection Systems is typically the responsibility of the owners within the NERC standards. We recommend revising the definition to read as follows: "The entity to the planning of the owners within the NERC standards.	
Tennessee Valley Authority [1] For form consistency with other entity type definitions contained in Glossary, we recommend starting the definition with "The entity that than "The responsible entity that". [2] We believe the definition is intended to mean that the PA is the ent coordinates and integrates Transmission plans and resource plans with area. Transmission plans involve the planning of new Transmission faci taking committed Transmission Services into account. Additionally, the coordination of Protection Systems is typically the responsibility of the owners within the NERC standards. We recommend revising the definition to read as follows: "The entity to	
[3] If this type of change is considered to be beyond the scope of this precommend the SDT replace "transmission Facilities and service plans redline with "Transmission Service and Facility plans," in order to recommend the specific terms that seem to fit the definition narrative but also as	the "rather "ity that in their PA ilities, e asset that roject, we s," in the
use of conjoined terms - "Transmission Facilities". SDT response:	

[1] Thank you for your comments. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment
align defin team [3] T of w	nment of the existing languag nition to align with the existin n suggests submitting a Stand The drafting team appreciates work for this project because t	e of the Gloss ng definition in dards Authoria s your suggest the revisions of	tary and ROP cross-ove on the ROP. If you believe tration Request (SAR) out tion but notes that curre thange the meaning of	r terms. Fre revision at the revision at the revision at the ently the the origin	is project. As outlined in the SAR, the drafting team revisions were limited to for the term Planning Authority, the drafting team proposed revising the Glossary as should be made to improve the definition of Planning Authority, the drafting my perceived issues or proposed revisions to the definition. definitions are aligned. Your proposed revisions fall outside the permissible scope and definition (in both the ROP and the Glossary). As stated above, if you believe amends that you submit a SAR.
16	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT		fting team re	sponse to comments su	ıbmitted	by the Southwest Power Pool.
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on

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#	Commenter	Sogmont	Group name	Y/N	Comment		
#	Organization	Segment	Group name	T/IN	Comment		
SDT	<u>response</u> : Please see the dra	fting team re	sponse to your commen	t for Ter	whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team. m 4: Blackstart Resource.		
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.		
SDT	SDT response:						
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes			
SDT	response:						
21	Lee Schuster – Duke Energy	3		Yes			
SDT	<u>response</u> :						
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes			
SDT	<u>response</u> :						
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.		

Term 31: Planning Authority



Commenter	Segment	Group name	Y/N	Comment			
SDT response: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
Heather Morgan – EDP Renewables North America LLC	5		Yes				
response:							
Shawna Speer – Colorado Springs Utilities	1		Yes				
response:							
Linda Jacobson-Quinn – City of Farmington	3		No	The NERC Functional Model replaced Planning Authority with Planning Coordinator to better align it's functional obligations. The terms and functions represented in the functional model do not align with the proposed terms. In addition, in the WECC, there has been concerns over the potential Gap in Planning Coordinator Areas where facilities are not being included in a Planning Coordinator Area. A task force (PCFTF) has identified one of the key contributors to the problem is the lack of clarity and apparent contradictions between the NERC Functional Model, Rules of Procedure, and NERC Standards and Glossary. The inconsistencies need to be addressed.			
	Organization response: Thank you for your ned in the SAR, the drafting to project, the drafting team will el to incorporate the industry ciated Technical Documents a reporates new and emergent re lopment of the Phase 2 record Heather Morgan — EDP Renewables North America LLC response: Shawna Speer — Colorado Springs Utilities response: Linda Jacobson-Quinn —	Organization response: Thank you for your comments; he med in the SAR, the drafting team revisions project, the drafting team will make a recorded to incorporate the industry-approved alignated Technical Documents at the direction prorates new and emergent reliability related lopment of the Phase 2 recommendations. Heather Morgan — 5 EDP Renewables North America LLC response: Shawna Speer — 1 Colorado Springs Utilities response: Linda Jacobson-Quinn — 3	Organization response: Thank you for your comments; however, modifications ned in the SAR, the drafting team revisions were limited to alignmore, the drafting team will make a recommendation to the State to incorporate the industry-approved alignment revisions. Note that the direction of the Standards Comporates new and emergent reliability related tasks. The drafting to lopment of the Phase 2 recommendations. Heather Morgan — 5 EDP Renewables North America LLC response: Shawna Speer — 1 Colorado Springs Utilities response: Linda Jacobson-Quinn — 3	Organization response: Thank you for your comments; however, modifications to the Fund in the SAR, the drafting team revisions were limited to alignment of the project, the drafting team will make a recommendation to the Standards Corel to incorporate the industry-approved alignment revisions. Note that the ciated Technical Documents at the direction of the Standards Committee (Standards new and emergent reliability related tasks. The drafting team high lopment of the Phase 2 recommendations. Heather Morgan — 5 Yes EDP Renewables North America LLC response: Shawna Speer — 1 Yes Colorado Springs Utilities response:			

SDT response: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment			
27	Dan Wilson –	5		Yes				
	PPL Electric Utilities							
	Corporation							
SDT	<u>response</u> :							
28	Yvonne McMackin –	4		Yes				
	Public Utility District No.							
	2 of Grant County,							
	Washington							
SDT	<u>response</u> :							
29	Michiko Sell –	1		Yes				
	Public Utility District No.							
	2 of Grant County,							
	Washington							
SDT	<u>response</u> :							
30	Alex Ybarra –	5		Yes				
	Public Utility District No.							
	2 of Grant County,							
	Washington							
SDT	<u>response</u> :							
31	Mike Smith –	1		No	Inconsistent approach is used for referencing defined terms with different			
	Manitoba Hydro				suffixes. For defined term "Facility", sometimes referenced as "Facilities" and			
					other times "Facility(ies)".			
					Note that this inconsistency extends to multiple Glossary of Terms definitions that			
					are not currently addressed in this project.			
SDT	<u>SDT response</u> : Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms.							

<u>SDT response</u>: Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the



#	Commenter Organization	Segment	Group name	Y/N	Comment
	mmendations. The drafting mmendations.	team highly er	ncourages you to atten	d the next	t Project 2015-04 meeting which will focus on development of these Phase 2
32	Andrew Gallo – Austin Energy	6		Yes	
SDT	response:				
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
SDT	response:				
34	Yuguang Xiao – Manitoba Hydro	5		No	
SDT	response:				
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	response:				
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We agree with the stated capitalization changes. However in Phase 2, since Planning Authority no longer exists in the Functional Model, this term should be retired from the Glossary or else the definition here moved under Planning Coordinator and then place the link from the old Planning Authority term under



#	Commenter Organization	Segment	Group name	Y/N	Comment
					that definition. Simply put, move the definition stated above under Planning Coordinator, and then change the Planning Authority definition to: "See Planning Coordinator." Also unless underway already in other Projects, a SAR should be created to correct existing Standard references to Planning Coordinator.

<u>SDT response</u>: Your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Planning Authority (or Planning Coordinator), the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition or Reliability Standards.

Additionally, the drafting team notes that to the extent possible, there should be consistency of terminology across NERC documents. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes				
SDT	SDT response:							
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		No	The responsible entity that integrates the information from a resource plan, applicable Protection Systems, load service plans, and transmission Facilities into a transmission plan.			

<u>SDT response</u>: Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of Planning Authority, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.

Term 31: Planning Authority



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
41	Ben Engelby –	6	ACES Standards	No	We recommend retiring the term "Planning Authority" and formally adopt		
	ACES Power Marketing		Collaborators -		"Planning Coordinator" in its place. There should not be two terms with the same		
			Terms Project		meaning.		
SDT	response: Thank you for you	ir comments;	however, your propos	ed revisio	ns are outside of the permissible scope of work for this project. For the term		
Plan	ning Authority, the drafting t	eam propose	d revising the Glossary	definition	to align with the existing definition in the ROP. The drafting team did not have		
auth	orization to revise the definit	tions outside	of addressing alignmer	nt betwee	n the existing definition language in the Glossary and ROP. If you believe revisions		
shou	ald be made to the definition	of Planning A	uthority, the drafting t	eam sugg	ests submitting a Standards Authorization Request (SAR) outlining any perceived		
issue	es or proposed revisions to th	ne definition.					
42	Andy Bolivar –	1		Yes			
	NextEra Energy - Florida						
	Power and Light Co.						
SDT	response:						
							
43	Kathleen Black –	3,4,5		Yes			
	DTE Energy						
SDT	response:						
-							
44	Jennifer Losacco –	1		Yes			
	NextEra Energy - Florida						
	Power and Light Co.						
SDT	response:						
45	Jared Shakespeare –	1		Yes			
	Peak Reliability						
SDT	SDT response:						
	<u> </u>						
46	Tony Eddleman –	3		Yes			
	Nebraska Public Power						
	District						
SDT	SDT response:						
47	Bernard Johnson –	5		Yes			
	1	1	1		1		

Term 31: Planning Authority



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization Oglethorpe Power						
	Corporation						
SDT	response:						
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes			
	Duke Energy						
SDT	response:						
49	Andrea Jessup –	1,3,5,6		Yes			
	Bonneville Power						
	Administration						
SDT	SDT response:						
50	Steven Rueckert –	10		Yes	I voted affirmative to approve the definition, but suggest that a reference or		
	Western Electricity				statement that PA is the same as PC be included.		
	Coordinating Council						
CDT			1				

<u>SDT response</u>: Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of Planning Authority, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.

End of Report



Consideration of Comments Term 33: Point of Receipt

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 33: Point of Receipt

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

* = *			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi CAISO WECC 2	
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Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

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Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 33: Point of Receipt (redline)

Point of Receipt:

A location that the Transmission Service Provider specifies on its transmission system where an Interchange Transaction enters or a <u>Generator generator</u> delivers its output.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term "Generator" because it is not a defined term in Glossary or the ROP.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Emily Rousseau – MRO	1,2,3,4, 5,6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	response:								
3	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	response:								
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5, 6		Yes					
SDT	SDT response:								
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes					
SDT	response:								



#	Commenter Organization	Segment	Group name	Y/N	Comment		
6	Amy Casuscelli –	1,3,5,6		Yes			
	Xcel Energy, Inc.						
SDT	<u>response</u> :						
7	Thomas Foltz – AEP	5		Yes			
SDT	response:						
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes			
SDT	SDT response:						
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes			
SDT	response:						
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources,	Yes			
SDT	response:						
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	Transmission System should be capitalized. Transmission System should be uniquely defined. The definitions of Transmission and System should not have to be merged by a reader to create the Transmission System definition.		
draft will t	SDT response: The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. To the extent you believe a new defined term ("Transmission System") should be created, the team suggests that you submit a SAR.						
12	Joe O'Brien –	6		Yes			



#	Commenter	Segment	Group name	Y/N	Comment				
	Organization								
	NiSource - Northern								
	Indiana Public Service Co.								
SDT	response:								
13	Andrew Pusztai –	1		Yes					
	American Transmission								
	Company, LLC								
SDT	SDT response:								
14	Matthew Beilfuss –	3,4,5,6		Yes					
	WEC Energy Group, Inc.								
SDT	SDT response:								
15	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary				
	Tennessee Valley				definition.				
	Authority								
	,				We also recommend capitalization of the word "Transmission" within the Point of				
					Receipt (POR) definition because this term is defined in the Glossary and we				
					believe its usage in the POR definition narrative is intended to have the meaning				
					of the defined term.				
					"System" is also a defined term in the Glossary, but its use in the POR definition				
					narrative does not appear to have the same meaning as the defined term.				
SDT	response: Thank you for you	r comments.	The drafting team agrees	s that th	ere should be consistency in the use of capitalization throughout the NERC defined				
					ed, including, but not limited to: capitalization of a term that is not a defined term;				
					;; and, capitalization of a term that is a defined term but should not be capitalized				
	•			_	drafting team revisions were limited to alignment of the existing definitions, and				
	therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the								
	ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop								
	recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the								
			· · · · · · · · · · · · · · · · · · ·	•	eam recommendations. The drafting team encourages you to attend the next				
	ect 2015-04 meeting which w		•						
,									
16	Jared Shakespeare –	1		Yes					
		ı	<u> </u>						



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	Peak Reliability								
SDT	SDT response:								
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.				
SDT	SDT response: Please see the drafting team response to comments submitted by the Southwest Power Pool.								
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.				
ועכ	response: Please see the dra	nung team r	esponse to your comm	ent for Te	HIII 4. DIAUKSTAIT NESUUTEE.				



#	Commenter Organization	Segment	Group name	Y/N	Comment
19	John Allen –	4		Yes	
	City Utilities of				
	Springfield, Missouri				
SDT	<u>response</u> :				
20	Jeremy Voll –	3		Yes	
	Basin Electric Power				
	Cooperative				
SDT	<u>response</u> :				
21	Lee Schuster –	3		Yes	
	Duke Energy				
SDT	response:				
22	Si Truc Phan –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	<u>response</u> :				
23	Christina Bigelow –	2	IRC Standards Review	Yes	
	Electric Reliability Council		Committee		
	of Texas, Inc.				
SDT	response:				
24	Heather Morgan –	5		Yes	
	EDP Renewables North	-			
	America LLC				
SDT	response:			l	
25	Shawna Speer –	1		Yes	
	Colorado Springs Utilities				
SDT	response:				



#	Commenter	Segment	Group name	Y/N	Comment				
	Organization								
26	Linda Jacobson-Quinn –	3		Yes					
	City of Farmington								
SDT	SDT response:								
									
27	Dan Wilson –	5		Yes					
	PPL Electric Utilities								
	Corporation								
SDT	response:								
28	Yvonne McMackin –	4		Yes					
	Public Utility District No.								
	2 of Grant County,								
	Washington								
SDT	response:	<u>l</u>							
29	Michiko Sell –	1		Yes					
	Public Utility District No.								
	2 of Grant County,								
	Washington								
SDT	response:								
									
30	Alex Ybarra –	5		Yes					
	Public Utility District No.								
	2 of Grant County,								
	Washington								
SDT	response:								
31	Mike Smith –	1		Yes					
	Manitoba Hydro								
SDT	response:								
32	Andrew Gallo –	6		Yes					
	Austin Energy								
		·							



ission System should be capitalized.

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop



#	Commenter Organization	Segment	Group name	Y/N	Comment			
reco	recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the							
			•		eam recommendations. The drafting team encourages you to attend the next			
Proj	ect 2015-04 meeting which w	ill focus on c	levelopment of the Phase	2 recon	nmendations.			
39	Manon Paquet –	1, 5		Yes				
	On Behalf of: Roger							
	Dufresne, Hydro-Quebec							
	Production							
<u>SDT</u>	<u>response</u> :							
40	Robert A. Schaffeld –	1		Yes				
	Southern Company -							
	Southern Company							
	Services, Inc.							
<u>SDT</u>	<u>response</u> :							
44	D F II.	-	A CES Classification	NI -	### WE was a state of the state			
41	Ben Engelby –	6	ACES Standards	No	"Transmission" and "System" are both defined terms and the drafting team			
	ACES Power Marketing		Collaborators - Terms		should consider if they should be capitalized.			
CDT			Project					
					ere should be consistency in the use of capitalization throughout the NERC defined			
			•		ed, including, but not limited to: capitalization of a term that is not a defined term;			
	· · · · · · · · · · · · · · · · · · ·				; and, capitalization of a term that is a defined term but should not be capitalized drafting team revisions were limited to alignment of the <i>existing</i> definitions, and			
					ting definitions were aligned (and the capitalization issue was present in both the			
		•	•		onsider all of the capitalization issues identified during Phase 1 and develop			
			· · · · · · · · · · · · · · · · · · ·		·			
	recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the							
	decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next							
FTOJ	Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
42	Andy Bolivar –	1		Yes				
74	NextEra Energy - Florida	1		103				
	Power and Light Co.							
SDT	response:							
<u> </u>	i coponiac.							



#	Commenter Organization	Segment	Group name	Y/N	Comment
43	Kathleen Black –	3,4,5		Yes	
SDT	DTE Energy response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the definition, as it is currently a defined term.

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment		
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes			
SDT	SDT response:						

End of Report



Consideration of Comments Term 36: Reactive Power

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015
Associated Ballot: Term 36: Reactive Power

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

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Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 36: Reactive Power (redline)

Reactive Power:

The portion of electricity that establishes and sustains the electric and magnetic fields of alternating-current equipment. Reactive power-Power-Power- must supply the reactive losses on transmission facilities. Reactive power-Power- is provided by generators, synchronous condensers, or electrostatic equipment such as capacitors and directly influences electric system voltage. It is usually expressed in kilovars (kvar) or megavars (Mvar).

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Power" because "Reactive Power" is a defined term and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot –	1		Yes					
SDT	Bryan Texas Utilities SDT response:								
2	Emily Rousseau – MRO	1,2,3,4, 5,6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	SDT response:								
3	Leonard Kula – Independent Electricity System Operator	2		No	We do not agree with the proposed revisions as it fall short of including the Reliability Coordinator. We suggest to add "and Reliability Coordinator's" after each of the "Transmission Operator's" since in EOP-006-2, the RC's restoration plan also requires the utilization of Blackstart Resources.				
	<u>SDT response</u> : These comments do not pertain to the revisions made to Reactive Power. The drafting team refers to the response to comments for Term 4 – Blackstart Resource.								
4	Mary Claire Yatsko –	1,3,4,5, 6		Yes					



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Seminole Electric				
	Cooperative, Inc.				
SDT	response:				
5	John Seelke –	1,2,5,6	PSEG	Yes	
	PSEG				
SDT	response:				
	 _				
6	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.				
SDT	response:			ı	
					
7	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:				
8	Dennis Minton –	1		Yes	
	Florida Keys Electric				
	Cooperative Assoc.				
SDT	response:	•		"	
9	Rob Collins –	1, 6, 5, 3		Yes	
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDT	response:				
10	Louis Slade –	6	Dominion Resources,	Yes	
	Dominion Resources, Inc.		Inc.		
SDT	response:				
11	Lee Pedowicz –	10	NPCCProject 2015-	No	[1] Transmission Facilities should be capitalized. Transmission Facilities should be
			04		uniquely defined. The definitions of Transmission and Facilty(ies) should not have
L	l	I	-	1	



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Northeast Power Coordinating Council				to be merged by a reader to create the Transmission Facilities definition. [2] Should the "k" in kvar be capitalized?
CDT					

SDT response:

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[2] The International System of Units provides that a lowercase "k" is used to indicate kilo.

12	Joe O'Brien –	6		Yes				
	NiSource - Northern							
	Indiana Public Service Co.							
SDT	SDT response:							
13	Andrew Pusztai –	1		Yes				
	American Transmission							
	Company, LLC							
SDT	SDT response:							
14	Matthew Beilfuss –	3,4,5,6		No	The proposed change to the term uses the term to define itself. The first			

<u>SDT response</u>: Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Reactive Power, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. However, to the extent that you believe the issues

WEC Energy Group, Inc.

sentence of the NERC Glossary term for Reactive Power is sufficient. This would

be simple and in line with the definition for Real Power.



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	dentified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR proposing revisions to the lefinition of Reactive Power.								
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. [1] We also recommend capitalization of the word "Transmission" within the Reactive Power definition because this term is defined in the Glossary and we believe its usage in the Reactive Power definition narrative is intended to have the meaning of the defined term. [2] "Facilities" is also a defined term (Facility), although capitalizing it will create a conjoined term - "Transmission Facilities". [3] We also recommend capitalizing "system" - replace "electric system voltage" with "electric System voltage". [4] Recommend changing "kvar" to "kVAr", and "Mvar" to "MVAr".				

SDT response:

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[2] See response to [1] above.

[3] See response to [1] above.



#	Commenter Organization	Segment	Group name	Y/N	Comment					
[4] \	4] With the proposed revisions to the Glossary, the definitions in the ROP and Glossary are aligned.									
16	Jared Shakespeare – Peak Reliability	1		Yes						
SDT	response:									
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.					
SDT	response: Please see the dra	fting team r	esponse to comments s	ubmitted	by the Southwest Power Pool.					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort,					



#	Commenter Organization	Segment	Group name	Y/N	Comment
					particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
<u>SDT</u>	response: Please see the dra	fting team re	esponse to your commen	t for Ter	m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
SDT	response:				
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
21	Lee Schuster – Duke Energy	3	_	Yes	
SDT	response:				
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	Comments provided in the attached file.
SDT	response: Attached commer	nts were not	received.		
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	America LLC response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
SDT	<u>response</u> :				
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:				
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
SDT	response:				
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	response:				
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	response:				
31	Mike Smith – Manitoba Hydro	1		Yes	
SDT	response:				



#	Commenter	Segment	Group name	Y/N	Comment			
"	Organization	Jeginene	Group name	1714	Comment			
32	Andrew Gallo –	6		Yes				
	Austin Energy							
SDT	response:							
				1				
33	Rachel Coyne –	10		Yes				
	Texas Reliability Entity,							
CDT	Inc.							
301	<u>response</u> :							
34	Yuguang Xiao –	5		Yes				
	Manitoba Hydro							
SDT	response:							
		T _		Ι.,				
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes				
SDT	response:							
301	response.							
36	Martin Boisvert –	1		Yes				
	Hydro-Quebec							
	TransEnergie							
SDT	<u>response</u> :							
37	Erika Doot –	5		Yes				
	U.S. Bureau of							
	Reclamation							
SDT	SDT response:							
38	Jason Smith –	2	SPP Standards	Yes	In Phase 2, investigate whether Transmission and/or Facilities should be			
	Southwest Power Pool,		Review Group		capitalized.			
	Inc. (RTO)							
					nere should be consistency in the use of capitalization throughout the NERC defined			
term	terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term;							

Project 2015-04 - Alignment of Terms | Consideration of Comments Term 36: Reactive Power August 2015



#	Commenter Organization	Segment	Group name	Y/N	Comment				
there ROP reco decis	failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.								
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1,5		Yes					
SDT	response:								
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes					
SDT	<u>response</u> :								
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	"Transmission" and "Facilities" are both defined terms and the drafting team should consider if they should be capitalized.				
term failur beca there ROP reco decis	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.								
42	Andy Bolivar –	1		Yes					



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
	NextEra Energy - Florida						
	Power and Light Co.						
SDT	SDT response:						
43	Kathleen Black –	3,4,5		Yes			
	DTE Energy						
SDT	response:						
44	Jennifer Losacco –	1		Yes			
	NextEra Energy - Florida						
	Power and Light Co.						
SDT	response:						
<u> </u>	<u> </u>						
45	Jared Shakespeare –	1		Yes			
	Peak Reliability						
SDT	response:						
<u> </u>	<u> </u>						
46	Tony Eddleman –	3		Yes			
	Nebraska Public Power						
	District						
SDT	response:						
47	Bernard Johnson –	5		Yes			
	Oglethorpe Power						
	Corporation						
SDT	SDT response:						
351	·						
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the terms "Transmission" and "Facilities"		
	Duke Energy		J.		throughout the definition, as they are currently defined terms.		
SDT		r comments	. The drafting team agree	s that th	ere should be consistency in the use of capitalization throughout the NERC defined		

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the



#	Commenter Organization	Segment	Group name	Y/N	Comment			
reco deci:	ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
49	Andrea Jessup – 1,3,5,6 Bonneville Power Administration Yes							
SDT	SDT response:							

End of Report



Consideration of Comments Term 37: Real Power

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015
Associated Ballot: Term 37: Real Power

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	F	Region	Segments
Christina Bigelow	ERCOT	1	TRE	2
Kathleen Goodman	ISO-NE	1	NPCC	2
Mark Holman	PJM	F	RFC	2
Charles Yeung	SPP	S	SPP	2
Ben Li	IESO	1	NPCC	2
Greg Campoli	NYISO	1	NPCC	2
Terry Bilke	MISO	F	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	SPP	1,3,5,6	

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

August 2015



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 37: Real Power (redline)

Real Power:

The portion of electricity that supplies energy to the loadLoad.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "load" in the Glossary because it is a defined term and its usage in this definition narrative is intended to have the meaning of the defined term. In the definition narrative of Real Power, use of the word load is intended to mean an end-use device or customer.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	response:				
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	response:				
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
SDT	response:				
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:				
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment
SDT	<u>response</u> :				
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:				
7	Thomas Foltz – AEP	5		Yes	
SDT	response:				
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:		1		
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:				
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
SDT	response:				
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	Yes	
SDT	response:				
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	



			L.		
#	Commenter Organization	Segment	Group name	Y/N	Comment
SDT	<u>response</u> :				
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
SDT	response:				
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	<u>response</u> :				
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	
SDT	response:			·	
16	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the dra	fting team re	sponse to comments su	ubmitted	by the Southwest Power Pool.
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the
					meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a



#	Commenter Organization	Segment	Group name	Y/N	Comment
					lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	fting team res	sponse to your commen	t for Ter	m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
SDT	response:				
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	<u>response</u> :				
21	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
22	Si Truc Phan –	1		Yes	



					· ·
#	Commenter Organization	Segment	Group name	Y/N	Comment
	Hydro-Quebec TransEnergie				
SDT	response:				
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	Comments provided in the attached file.
SDT	response: Attached commen	ts were not re	eceived.	_	
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	response:				
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
SDT	response:				
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:			•	
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
SDT	response:			·	



#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	response:				
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	response:			·	
31	Mike Smith – Manitoba Hydro	1		Yes	
SDT	response:			·	
32	Andrew Gallo – Austin Energy	6		Yes	
SDT	<u>response</u> :				
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
SDT	response:				
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
SDT	<u>response</u> :				
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				



					•
#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
SDT	<u>response</u> :				
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	<u>response</u> :				
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
SDT	response:				
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
SDT	response:				
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
SDT	response:				
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	
SDT	response:				
42	Andy Bolivar –	1		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	NextEra Energy - Florida Power and Light Co.				
SDT	response:				
43	Kathleen Black – DTE Energy	3,4,5		Yes	
SDT	response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
SDT	response:				
49	Andrea Jessup –	1,3,5,6		Yes	



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Bonneville Power				
	Administration				
SDT	response:				

End of Report



Consideration of Comments Term 38: Reliability Coordinator

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 38: Reliability Coordinator

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	F	Region	Segments
Christina Bigelow	ERCOT	1	TRE	2
Kathleen Goodman	ISO-NE	1	NPCC	2
Mark Holman	PJM	F	RFC	2
Charles Yeung	SPP	S	SPP	2
Ben Li	IESO	1	NPCC	2
Greg Campoli	NYISO	1	NPCC	2
Terry Bilke	MISO	F	RFC	2

August 2015



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Region	Segments	
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Region	Segments	
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 38: Reliability Coordinator (redline)

Reliability Coordinator:

The entity that is the highest level of authority who is responsible for the reliable Reliable operation Operation of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator's vision.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Reliable Operation" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment		
1	John Fontenot – Bryan Texas Utilities	1		Yes			
SDT	SDT response:						
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes			
SDT	response:						
3	Leonard Kula – Independent Electricity System Operator	2		Yes			
SDT	response:						
4	Mary Claire Yatsko –	1,3,4,5,6		Yes			



				24/21	
#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Seminole Electric				
	Cooperative, Inc.				
SDT	response:				
32.	 .				
5	John Seelke –	1,2,5,6	PSEG	Yes	
	PSEG	1,2,3,0	1323	103	
CDT	response:				
301	response.				
6	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.	1,3,3,0		103	
CDT					
301	<u>response</u> :				
7	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:				
301	<u>16560136</u> .				
8	Dennis Minton –	1		Yes	
	Florida Keys Electric	_		. 00	
	Cooperative Assoc.				
SDT	response:				
301	response.				
9	Rob Collins –	1, 6, 5, 3		Yes	
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
CDT					
301	<u>response</u> :				
10	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	response:		1 3222223,		
351	response.				
11	Lee Pedowicz –	10	NPCCProject 2015-	No	Transmission Systems should be capitalized because both are terms defined in the
			04		NERC Glossary.
	<u> </u>	1	<u> </u>	ı	,



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
	Northeast Power				Real-time should be capitalized.		
CDT	Coordinating Council		9	and an ob-			
term failu beca ther ROP reco deci:	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.						
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6					
SDT	response:						
13	Andrew Pusztai – American Transmission	1		Yes			
	Company, LLC						
SDT	response:						
14	Matthew Beilfuss –	3,4,5,6		Yes			
	WEC Energy Group, Inc.						
SDT	response:						
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. We also recommend capitalization of the words "Real-time" and "Transmission"		
					within the Reliability Coordinator (RC) definition because these terms are defined in the Glossary and we believe their usage in the RC definition narrative is intended to have the meaning of the defined terms.		



#	Commenter Organization	Segment	Group name	Y/N	Comment		
term failur beca there ROP reco decis	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.						
16	Jared Shakespeare – Peak Reliability	1		Yes			
SDT	SDT response:						
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.		
SDT	response: Please see the draft	fting team re	sponse to comments su	ıbmitted	by the Southwest Power Pool.		
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to		



#	Commenter	Segment	Group name	Y/N	Comment
#	Organization	Segment	Group name	1/19	Comment
	3-111-2-11-11-11-11-11-11-11-11-11-11-11-				create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	fting team re	sponse to your commen	nt for Ter	m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
SDT	response:				
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
21	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
					disagree with the proposed changes, it recommends that the SDT take this
					opportunity to also synchronize this definition with the Functional Model.
					unctional Model fall outside the permissible scope of the work for this project. As
	and the contract of the contra				ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of
					Committee that the Functional Model Advisory Group (FMAG) update the Functional
	•		-		e purpose of the FMAG is to maintain the NERC Reliability Functional Model and the
					SC) to ensure the model correctly reflects the industry today and evaluates and
	•	•		eam high	hly encourages you to attend the next Project 2015-04 meeting which will focus on
	lopment of the Phase 2 reco			Ι.,	
24	Heather Morgan –	5		Yes	
	EDP Renewables North				
CDT	America LLC				
<u>201</u>	response:				
25	Shawna Speer –	1		No	Reference the group comments - Colorado Springs Utilities
	Colorado Springs Utilities	1		110	Neterence the group comments colorado springs camales
SDT	response:				
					
26	Linda Jacobson-Quinn –	3		Yes	The NERC Functional Model should be modified in order to be consistent with the
	City of Farmington				NERC Glossary.
SDT	response: Thank you for you	r comments; h	lowever, modifications	to the Fu	unctional Model fall outside the permissible scope of the work for this project. As
	· · · · · · · · · · · · · · · · · · ·				ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of
					Committee that the Functional Model Advisory Group (FMAG) update the Functional
	•				e purpose of the FMAG is to maintain the NERC Reliability Functional Model and the
					SC) to ensure the model correctly reflects the industry today and evaluates and
	•	•	•	eam high	hly encourages you to attend the next Project 2015-04 meeting which will focus on
deve	lopment of the Phase 2 reco	mmendations.			
27	Day Milan			T Vs -	
27	Dan Wilson –	5		Yes	
	PPL Electric Utilities				
SDT	Corporation response:				
301	i espulise.				
28	Yvonne McMackin –	4		Yes	
				1	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No. 2 of Grant County, Washington				
SDT	<u>response</u> :				
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	response:				
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	response:				
31	Mike Smith – Manitoba Hydro	1		Yes	
SDT	response:				
32	Andrew Gallo – Austin Energy	6		Yes	
SDT	<u>response</u> :				
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
SDT	response:				
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:			·	
36	Martin Boisvert – Hydro-Quebec TransEnergie response:	1		Yes	
301	response.				
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	response:			·	
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	[1] In the defined term "Reliable Operation", the use of the phrase Bulk-Power System is used. We recommend investigating and reporting on the correct use of this phrase in the definition as it could lead to increased scope of responsibility for the Reliability Coordinator or other entities responsible for Reliable Operation. A Reliability Coordinator does not "operate the elements of the Bulk-Power System" per its functional requirements. So using the capitalized term here is inappropriate and concludes that the RC now has operating requirements for elements and Facilities. Perhaps in Phase 2, the definition of Reliability Coordinator could be adjusted to not use the similar phrase "reliable operation". The use of this phrasing is also not consistent with the definition of Reliability Standard where the Standard provides for "reliable operation of the bulk-power system" but the Reliability Coordinator is responsible for "reliable operation of the Bulk-Electric System". [2] The phrase "real-time" is also used in the definition and should be reviewed for capitalization in Phase 2. Reference to the appropriate horizons such as but not limited to: Operating Horizon or Real-Time Operations Horizons in the definition would be more clear.



#	Commenter Organization	Segment	Group name	Y/N	Comment
[1] T reco resp revise exte	gnizes that Reliability Coordir onsible for the reliable opera- sions accord with the scope or	nators (RCs) d tion of the BE f responsibilit identified in	o not physically operate S, as stated in the revise by for Reliability Coording your comments should	the elered definitions and the thick the thick the thick the the thick the t	sed in your comments, and discussed the issues at great length. The drafting team ments of the BPS. However, the team maintains that RCs ultimately remain tion for Reliability Coordinator. The team believes that the proposed alignment d do not foist any operating requirements upon the Reliability Coordinator. To the essed by a development project, the drafting team encourages you to submit a SAR issues.
revis were capit to th	sions were limited to alignment e aligned (and the capitalization talization issues identified dur ne Standards Committee (SC)	nt of the <i>exis</i> on issue was ring Phase 1 a and NERC. It	ting definitions, and the present in both the ROP and develop recommend will be the decision of the	refore th and Glo lations fo he SC an	italization throughout the NERC defined terms. However, the drafting team the team was not at liberty to address capitalization issues if the existing definitions assary definition). As part of Phase 2 of this project, the team will consider all of the or how to address these issues. The drafting team will provide its recommendations d NERC regarding how to best proceed with the drafting team recommendations. which will focus on development of the Phase 2 recommendations.
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
SDT	response:				
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
SDT	<u>response</u> :				
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	"Emergency," "Real-time," "Transmission," and "System" are defined terms and the drafting team should consider if they should be capitalized.
tean	n revisions were limited to ali	gnment of th	e <i>existing</i> definitions, an	d theref	e use of capitalization throughout the NERC defined terms. However, the drafting ore the team was not at liberty to address capitalization issues if the existing OP and Glossary definition). As part of Phase 2 of this project, the team will

consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its



#	Commenter Organization	Segment	Group name	Y/N	Comment
eco					ecision of the SC and NERC regarding how to best proceed with the drafting team ect 2015-04 meeting which will focus on development of the Phase 2
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
43	Kathleen Black – DTE Energy	3,4,5		Yes	
SDT	response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	
<u>SDT</u>	<u>response</u> :				
46	Tony Eddleman – Nebraska Public Power District	3		No	I support SPP comments.
<u>SDT</u>	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests the use, and the capitalization of the term "Bulk-Power System" in the place of "Bulk Electric System" in the definition, as the term



#	Commenter Organization	Segment	Group name	Y/N	Comment
					"Reliable Operation" uses the term "Bulk-Power System" within its own definition.
					Also, we suggest capitalizing the terms "Transmission", and "Facilities" as they are both currently defined terms.

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

Additionally, the drafting team notes that during the Phase 1 work, a number of questions were raised regarding inconsistent or improper usage of the terms Bulk Electric System (BES) and Bulk Power System (BPS). During Phase 2, the drafting team will consider recommending that an effort is undertaken to review and assess usage of the terms BES and BPS throughout the Reliability Standards, Glossary, and ROP to ensure proper usage and application given the particular context.

49	Andrea Jessup –	1,3,5,6	Yes	
	Bonneville Power			
	Administration			

SDT response:

End of Report



Consideration of Comments Term 40: Reliability Standard

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015

Comment Period End Date: 7/27/2015

Associated Ballot: Term 40: Reliability Standard

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1
Nobel Cledilli	The officea manimating company	111 66	

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

August 2015



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 40: Reliability Standard (redline)

Reliability Standard:

A requirement, approved by the United States Federal Energy Regulatory Commission under this-Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

The SDT is proposing revisions to the FERC-approved Glossary definition to clarify that defined terms contained in the definition narrative are not capitalized in order to maintain consistency with the Federal Power Act. Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata changes (below is the balloted definition with a redline of the errata changes):

Reliability Standard:

A requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk power system [Bulk Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

Explanation of errata changes:

In an attempt to provide clarity that the defined terms "Reliable Operation" and "Bulk Power System" were consistent with the definitions in the Federal Power Act, the drafting team originally included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that



repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot –	1		Yes	
	Bryan Texas Utilities				
SDT	<u>response</u> :				
2	Kathy Caignon –	3		Yes	
	City of Vineland				
SDT	<u>response</u> :				
3	Emily Rousseau –	1,2,3,4,5,	MRO-NERC	Yes	
	MRO	6	Standards Review		
			Forum (NSRF)		
SDT	response:				
4	Leonard Kula – Independent Electricity	2		No	While we generally support the proposed revisions, we are unable to support the inclusion of the phrase "In order to remain consistent with the Federal Power
	System Operator				Act," since there are entities such as the IESO that are not under FERC's
	, .				jurisdiction. We propose to revise the note as follows:
					(In order to remain consistent with published regulatory documents, defined
					terms contained in this narrative are not capitalized.)
SDT	response: The drafting team	agrees to ren	nove the parenthetical s	entence	that you take issue with. Please see above explanation regarding the errata
	nges made to the definition.		·		
5	Mary Claire Yatsko –	1,3,4,5,6		No	NERC should delete all references to the Federal Power Act throughout these
	Seminole Electric	, , , , ,			revisions and "re-capitalize" NERC defined terms within all of the
	Cooperative, Inc.				definitions. Seminole's reasoning for this is that each term should have one
					reference only. For example, if NERC feels that the defined term "Facilities" does

Term 40: Reliability Standard



#	Commenter Organization	Segment	Group name	Y/N	Comment
					not encapsulate the meaning put forth by Congress of "facilities" in the Federal Power Act, then the drafting team should revise the definition for Facilities. Referencing both the Federal Power Act and the NERC Glossary can cause confusion where legislative background can be interpreted differently than NERC definition drafting team responses and notes.

SDT response: In an attempt to provide clarity that the defined terms "Reliable Operation" and "Bulk Power System" were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

6	John Seelke – PSEG	1,2,5,6	PSEG	Yes					
SDT	SDT response:								
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes					
SDT	response:								
8	Thomas Foltz – AEP	5		Yes					
SDT	SDT response:								

Term 40: Reliability Standard



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	<u>response</u> :				
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	<u>response</u> :				
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion believes that all terms which are defined in the NERC Glossary should be capitalized for consistency. We do not agree that an exception, so that consistency with the Federal Power Act, should be made. If this exception is accepted, what justification would be used for not being consistent with other regulatory statutes?

SDT response: In an attempt to provide clarity that the defined terms "Reliable Operation" and "Bulk Power System" were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	[1] There is the note in the definition of Bulk Power System (Question 2) that defined terms are not capitalized to be consistent with the Federal Power Act. In this definition, that same note is made, yet terms in capitals are added in brackets. There should be consistency.
					[2] The definition of Reliability Standard in the NERC Glossary is significantly different from that in the Rules of Procedure. We recognize that this is a substantive change that must be addressed.
					lossary. A number of commenters believe that repeating the term introduces d the lowercase use of the term and retained the capitalized form. Also, the team
are unnerem the	ecessary complication and co loved the parenthetical sente NERC Glossary are the same, The drafting team agrees that	infusion. The once that explored these change prior to the a	drafting team therefore ained the reason for inclusion of the meaning of the mean	removed uding the ng or ap osed by	lossary. A number of commenters believe that repeating the term introduces of the lowercase use of the term and retained the capitalized form. Also, the team is lowercase use of the term. Because the definitions in the Federal Power Act and plication of the definition, and thus, are not substantive in nature. this team, the definitions in the Glossary and ROP contained a number of both the ROP and Glossary definitions resolve the issue.
are unnerem the	ecessary complication and conved the parenthetical sente NERC Glossary are the same, The drafting team agrees that erences. However, the team to be a complete or control of the control	infusion. The once that explored these change prior to the a	drafting team therefore ained the reason for inclusion of the meaning of the mean	removed uding the ng or ap osed by	the lowercase use of the term and retained the capitalized form. Also, the team e lowercase use of the term. Because the definitions in the Federal Power Act and plication of the definition, and thus, are not substantive in nature. this team, the definitions in the Glossary and ROP contained a number of
are unnoted the [2] 1 diffe	ecessary complication and conved the parenthetical sente NERC Glossary are the same, The drafting team agrees that erences. However, the team to be a complete or the same of	infusion. The once that explored these change prior to the applications that the coelieves the	drafting team therefore ained the reason for inclusion of the meaning of the mean	removed uding the ng or ap osed by nade to	the lowercase use of the term and retained the capitalized form. Also, the team e lowercase use of the term. Because the definitions in the Federal Power Act and plication of the definition, and thus, are not substantive in nature. this team, the definitions in the Glossary and ROP contained a number of
are unnoted the [2] 1 diffe	ecessary complication and conved the parenthetical sente NERC Glossary are the same, The drafting team agrees that erences. However, the team to be a complete or some control of the complete of the complet	infusion. The once that explored these change prior to the applications that the coelieves the	drafting team therefore ained the reason for inclusion of the meaning of the mean	removed uding the ng or ap osed by nade to	the lowercase use of the term and retained the capitalized form. Also, the team e lowercase use of the term. Because the definitions in the Federal Power Act and plication of the definition, and thus, are not substantive in nature. this team, the definitions in the Glossary and ROP contained a number of
are unnoted the un	Joe O'Brien – NiSource - Northern Indiana Public Service Co. Tresponse: Andrew Pusztai – American Transmission	nfusion. The once that explain these change prior to the applications that the following the following that the following the following the following that the following the following the following that the following the follow	drafting team therefore ained the reason for inclusion of the meaning of the mean	removed uding the ng or ap osed by nade to Yes	the lowercase use of the term and retained the capitalized form. Also, the team e lowercase use of the term. Because the definitions in the Federal Power Act and plication of the definition, and thus, are not substantive in nature. this team, the definitions in the Glossary and ROP contained a number of



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
16	Dennis Chastain –	1,3,5,6		Yes	Given the statement in parenthesis at the end of the definition, we believe that
	Tennessee Valley				retaining the capitalized terms in brackets throughout the definition adds
	Authority				unnecessary clutter.
		•			e Operation" and "Bulk Power System" were consistent with the definitions in the
defi the intro the Act	ined term; whereas, NERC use terms are defined in the sam oduces unnecessary complica team removed the parenthet and the NERC Glossary are th	es capitalization e manner in b tion and conf cical sentence e same, these	on to indicate a term ha both the Federal Power fusion. The drafting tear that explained the reas	s a defind Act and the	ase form of the term. This is because the Federal Power Act does not capitalize the ed meaning. Regardless of the capitalization, however, the important point is that he NERC Glossary. A number of commenters believe that repeating the term ore removed the lowercase use of the term and retained the capitalized form. Also, cluding the lowercase use of the term. Because the definitions in the Federal Powering or application of the definition, and thus, are not substantive in nature.
17	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	<u>response</u> :				
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the dra	fting team re	sponse to comments su	ıbmitted	by the Southwest Power Pool.
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.



	Commenter Organization	Segment	Group name	Y/N	Comment
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dr	rafting team resp	onse to your commer	nt for Ter	m 4: Blackstart Resource.
20	John Allen – City Utilities of	4		Yes	See comments from SPP Standards Review Group
	Springfield, Missouri				
SDT	Springfield, Missouri response:				
<u>SDT</u> 21		3		Yes	
21	response: Jeremy Voll – Basin Electric Power	3		Yes	
21	response: Jeremy Voll — Basin Electric Power Cooperative	3		Yes	
21 SDT 22	response: Jeremy Voll — Basin Electric Power Cooperative response: Lee Schuster —				



# Commenter Organization 24 Christina Bigelow — Electric Reliability Council of Texas, Inc. 25 IRC Standards Review Committee 26 Review Committee 27 Review Committee 28 Review Committee 29 Review Committee 10 U.S.C. 824(o) and 18 C.F.R. 39.1]." The SRC notes that, single such as the IESO that are not under FERC's jurisdiction, any redefinition should respect the differing regulatory regimes in a suggests that this note be reworded as follows:	he Federal Power Act ince there are entities revisions to the
Electric Reliability Council of Texas, Inc. Review Committee inclusion of the phrase "In order to remain consistent with the [16 U.S.C. 824(o) and 18 C.F.R. 39.1]." The SRC notes that, single such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, any red definition should respect the differing regulatory regimes in the such as the IESO that are not under FERC's jurisdiction, and the such as the IESO that are not under FERC's jurisdiction, and the such as the ieso that the such as the such as the ieso that the such as the su	he Federal Power Act ince there are entities revisions to the
The term does not include facilities used in the local distribut energy. (In order to remain consistent with applicable regular defined terms contained in this narrative are not capitalized. "Bulk-Power System" or "Bulk Power System" shall have the	atory authorities, .) Note that the terms
SDT response: In an attempt to provide clarity that the defined terms "Reliable Operation" and "Bulk Power System" were consistent with the	
Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act do defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeat introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capital team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive.	portant point is that ating the term apitalized form. Also, in the Federal Power
25 Heather Morgan – 5 Yes EDP Renewables North America LLC	
SDT response:	
26 Shawna Speer – 1 Yes Colorado Springs Utilities	
SDT response:	
27 Linda Jacobson-Quinn – 3 Yes City of Farmington	
SDT response:	
28 Dan Wilson – 5 Yes	



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	PPL Electric Utilities				
	Corporation				
SDT	response:				
29	Yvonne McMackin –	4		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				
30	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:			•	
31	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:			•	
32	Mike Smith –	1		No	Proposed changes to 6 (Bulk-Power System), 40 (Reliability Standard) and 41
	Manitoba Hydro				(Reliable Operation) relating to the Federal Power Act are not made consistently.
	·				
					Redlined added text referencing the Federal Power Act should be consistently
					written for #6, #40, #41. Bulk-Power System should appear consistently in the
					definitions of #6, #40, #41. Defined terms should be written consistently. If using
ĺ					"reliable operation [Reliable Operation]", should also use same
					approach "facilities [Facility(ies)]" for all other defined terms.
SDT	response: In an attempt to p	rovide clarity th	nat the defined terms	"Reliable	Operation" and "Bulk Power System" were consistent with the definitions in the

<u>SDT response</u>: In an attempt to provide clarity that the defined terms "Reliable Operation" and "Bulk Power System" were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that



#	Commenter Organization	Segment	Group name	Y/N	Comment			
Add term issue team reco	team removed the parentheticand the NERC Glossary are the itionally, the drafting team not not. However, the drafting team es if the existing definitions we will develop recommendation of the Standard of the Standard to th	cion and confical sentence e same, these tes its agreer n revisions were aligned (a ons to prevends Committee	usion. The drafting team that explained the reaso changes do not alter the ment that there should bere limited to alignment and the issue was present future misalignment or e (SC) and NERC. It will be	thereform for ince meaning the consist of the extended to the consist of the consist of the determinant of t	the NERC Glossary. A number of commenters believe that repeating the term are removed the lowercase use of the term and retained the capitalized form. Also, cluding the lowercase use of the term. Because the definitions in the Federal Powering or application of the definition, and thus, are not substantive in nature. It tency in form, sentence structure and capitalization throughout the NERC defined existing definitions, and therefore the team was not at liberty to address consistency in the ROP and Glossary definition). As part of Phase 2 of this project, the drafting stencies in NERC defined terms. The drafting team will provide its Phase 2 ecision of the SC and NERC regarding how to best proceed with the Project 2015-04 meeting which will focus on development of these Phase 2			
33	Andrew Gallo – Austin Energy	6		Yes				
SDT	<u>response</u> :							
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.			
term failu beca ther ROP reco deci	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
35	Yuguang Xiao – Manitoba Hydro	5		No				
SDT	response:							



	_				
#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	response:				
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
SDT	response:				
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
SDT	response:				
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
SDT	response:				
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	There needs to be consistency with the use of brackets to signify Glossary/ROP terms that are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The "Reliability Standard" definition uses brackets for the

Term 40: Reliability Standard



ш	C	Commont	C	V/NI	Community
Ħ	Commenter Organization	Segment	Group name	Y/N	Comment
					terms [Reliable Operation] and [Bulk-Power System]. However, the "Bulk-Power System" definition does not use brackets and Glossary/ROP terms are lower case.
SDT	response: In an attempt to p	rovide clarity	that the defined terms '	'Reliable	Operation" and "Bulk Power System" were consistent with the definitions in the
define the the	ned term; whereas, NERC use terms are defined in the same oduces unnecessary complica team removed the parenthet	es capitalization e manner in be tion and confi ical sentence	on to indicate a term has oth the Federal Power A usion. The drafting team that explained the reaso	a define act and to therefo on for inc	ase form of the term. This is because the Federal Power Act does not capitalize the ed meaning. Regardless of the capitalization, however, the important point is that he NERC Glossary. A number of commenters believe that repeating the term are removed the lowercase use of the term and retained the capitalized form. Also, cluding the lowercase use of the term. Because the definitions in the Federal Power ng or application of the definition, and thus, are not substantive in nature.
43	Andy Bolivar –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	<u>response</u> :				
44	Kathleen Black –	3,4,5		Yes	
	DTE Energy				
SDT	<u>response</u> :				
45	Jennifer Losacco –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	response:				
46	Jared Shakespeare –	1		Yes	
	Peak Reliability				
SDT	response:				
47	Tony Eddleman –	3		Yes	
	Nebraska Public Power				
CD-	District				
SUT	response:				
48	Bernard Johnson –	5		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment		
	Oglethorpe Power Corporation						
SDT	SDT response:						
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	No	Duke Energy seeks clarification regarding the proposed alignment of the term Reliability Standard. We feel as though additional measure could be taken to improve consistency. To improve consistency, we suggest that terms that are capitalized within a certain definition, should also be capitalized in both places. For example, if a term within the definition of Reliability Standard is capitalized in the Glossary of Terms, that same term should be capitalized in the definition of Reliability Standard within the NERC Rules of Procedure. Duke Energy also suggests, either using lower case where appropriate and delete the bracketed terms within the definition, or use the upper case of the terms and delete the unnecessary added language.		

<u>SDT response</u>: In an attempt to provide clarity that the defined terms "Reliable Operation" and "Bulk Power System" were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

50	Andrea Jessup –	1,3,5,6	Yes	



Power Act.

#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
	Bonneville Power						
	Administration						
SDT	SDT response:						
51	Patrick Brown - Canadian			No	Same comment as for term #6 (Bulk-Power System) above re: need for qualifier to		
	Electricity Association				clarify that the Federal Power Act is a U.S. statute.		
SDT	SDT response: Thank you for your comment. In response to your concerns, the drafting team removed the parenthetical containing the reference to the Federal						

End of Report



Consideration of Comments Term 41: Reliable Operation

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 41: Reliable Operation

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Term 41: Reliable Operation



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Term 41: Reliable Operation



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

August 2015

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

6



Question

Term 41: Reliable Operation (redline)

Reliable Operation:

Operating the elements of the bulk-power system [Bulk-Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

The SDT is proposing revisions to the FERC-approved Glossary definition to clarify that defined terms contained in the definition narrative are not capitalized in order to maintain consistency with the Federal Power Act.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata changes (below is the balloted definition with a redline of the errata changes):

Reliable Operation:

Operating the elements of the bulk power system [Bulk Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

Explanation of errata changes:

In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team originally included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot –	1		Yes	



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
	Bryan Texas Utilities						
SDT	response:						
2	Kathy Caignon –	3		Yes			
	City of Vineland						
SDT	response:						
3	Emily Rousseau –	12245	MRO-NERC	Yes			
3	MRO	1,2,3,4,5,		res			
	IVIRO	6	Standards Review				
CDT			Forum (NSRF)				
301	response:						
4	Leonard Kula –	2		No	While we generally support the proposed revisions, we are unable to support the		
	Independent Electricity				inclusion of the phrase "In order to remain consistent with the Federal Power		
	System Operator				Act," since there are entities such as the IESO that are not under FERC's		
					jurisdiction. We propose to revise the note as follows:		
					(In order to remain consistent with published regulatory documents, defined		
					terms contained in this narrative are not capitalized.)		
SDT	response: The drafting team	agrees to ren	nove the parenthetical s	sentence	that you take issue with. Please see above explanation regarding the errata		
char	nges made to the definition.						
5	Mary Claire Yatsko –	1,3,4,5,6		No	NERC should delete all references to the Federal Power Act throughout these		
	Seminole Electric				revisions and "re-capitalize" NERC defined terms within all of the		
	Cooperative, Inc.				definitions. Seminole's reasoning for this is that each term should have one		
					reference only. For example, if NERC feels that the defined term "Facilities" does		
					not encapsulate the meaning put forth by Congress of "facilities" in the Federal		
					Power Act, then the drafting team should revise the definition for		
					Facilities. Referencing both the Federal Power Act and the NERC Glossary can		
					cause confusion where legislative background can be interpreted differently than		
					NERC definition drafting team responses and notes.		
SDT	response: In an attempt to n	rovide clarity	that the defined term "	Bulk Dov	ver System" is consistent with the definition in the Federal Power Act, the drafting		

<u>SDT response</u>: In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same



#_	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
manı	ner in both the Federal Pow	er Act and the	NERC Glossary. A num	ber of cor	mmenters believe that repeating the term introduces unnecessary complication and		
conf	usion. The drafting team the	erefore remove	d the lowercase use of	the term	and retained the capitalized form. Also, the team removed the parenthetical		
sent	ence that explained the reas	son for includin	g the lowercase use of	the term.	Because the definition in the Federal Power Act and the NERC Glossary are the		
same	e, these changes do not alte	er the meaning	or application of the de	efinition, a	and thus, are not substantive in nature.		
Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
6	John Seelke –	1,2,5,6	PSEG	Yes			
	PSEG						
<u> 201</u>	<u>response</u> :						
7	Amy Casuscelli –	1,3,5,6		Yes			
	Xcel Energy, Inc.						
SDT	response:						
8	Thomas Foltz –	5		Yes			
•	AEP			1.03			
SDT	response:						
9	Dennis Minton –	1		Yes			
	Florida Keys Electric						
CDT	Cooperative Assoc.						
<u>אוס</u>	<u>response</u> :						
10	Rob Collins –	1, 6, 5, 3		Yes			

Term 41: Reliable Operation



#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.				
SDT	response:				
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion believes that all terms which are defined in the NERC Glossary should be capitalized for consistency. We do not agree that an exception, so that consistency with the Federal Power Act, should be made. If this exception is accepted, what justification would be used for not being consistent with other regulatory statutes?
man confi	ner in both the Federal Power usion. The drafting team ther ence that explained the reaso	r Act and the efore remove n for includin	NERC Glossary. A number of the lowercase use of the	er of cor he term he term	alization, however, the important point is that the term is defined in the same mmenters believe that repeating the term introduces unnecessary complication and and retained the capitalized form. Also, the team removed the parenthetical. Because the definition in the Federal Power Act and the NERC Glossary are the and thus, are not substantive in nature.
num wher mear addr Phas issue best	ber of capitalization issues we in the term has the definitional ning of the definition. Howeve ess capitalization issues if the e 2 of this project, the team we es. The drafting team will prove	ere identified, il meaning; ar er, the draftin existing defir vill consider a vide its recom im recommer	including, but not limited and, capitalization of a tering team revisions were limitions were aligned (and II of the capitalization is mendations to the Standadations. The drafting team	ed to: ca m that i mited to d the cap sues ide dards Co	f capitalization throughout the NERC defined terms. During the Phase 1 work, a pitalization of a term that is not a defined term; failure to capitalize a defined term is a defined term but should not be capitalized because it does not have the intended a alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to obtalization issue was present in both the ROP and Glossary definition). As part of intified during Phase 1 and develop recommendations for how to address these semmittee (SC) and NERC. It will be the decision of the SC and NERC regarding how to burages you to attend the next Project 2015-04 meeting which will focus on
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	[1] There is the note in the definition of Bulk Power System (Question 2) that defined terms are not capitalized to be consistent with the Federal Power Act. In this definition, that same note is made, yet terms in capitals are added in brackets. There should be consistency.

Term 41: Reliable Operation



#	Commenter Organization	Segment	Group name	Y/N	Comment	
					[2] Cyber Security Incident should be capitalized and the words Cyber and Security should be separated as they are in the Glossary.	
SDT	SDT response:					

[1] In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[2] The term Cyber Security Incident is defined differently in the ROP than it is in the Glossary. However, as outlined in the "Proposed Revisions to Align Cross-Over Terms" document, the drafting team decided not to make alignment revisions to the definition. This is because the changes that would be necessary to align the terms would necessitate a large number of other changes that were outside the scope of the SAR for this project. However, the team provided its recommendations to NERC legal staff, and an effort was undertaken to revise the ROP to incorporate all changes necessary as a result of the Version 5 revisions. To review the proposed changes to the ROP, click here. As outlined above, during Phase 2 of this project, the drafting team will develop recommendations to address consistency issues, including consistency in capitalization.

13	Joe O'Brien –	6		Yes			
	NiSource - Northern						
	Indiana Public Service Co.						
SDT	SDT response:						
14	Andrew Pusztai –	1		Yes			



#	Commenter Organization	Segment	Group name	Y/N	Comment
	American Transmission Company, LLC				
<u>SDT i</u>	<u>response</u> :				
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		No	The rationale to remain consistent with the FPA creates confusion when considering the definition of the term. It is well understood that capitalized terms in the glossary and other NERC documents refer to the glossary definition. By un-capitalizing the term it will be generally understood to not mean the NERC Glossary defined term, which is in contrast to the intent of the terms usage.

<u>SDT response</u>: In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

16	Dennis Chastain –	1,3,5,6	Yes	Given the statement in parenthesis at the end of the definition, we believe that
	Tennessee Valley			retaining the capitalized term in brackets in the definition adds unnecessary
	Authority			clutter.

<u>SDT response</u>: In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses

erin 41. Kenabie Operation



#	Commenter Organization	Segment	Group name	Y/N	Comment
mani confi	ner in both the Federal Powe usion. The drafting team ther ence that explained the reaso	r Act and the efore remove on for includin	NERC Glossary. A numed the lowercase use of the lowercase use of	ber of cor the term the term	alization, however, the important point is that the term is defined in the same mmenters believe that repeating the term introduces unnecessary complication and and retained the capitalized form. Also, the team removed the parenthetical . Because the definition in the Federal Power Act and the NERC Glossary are the and thus, are not substantive in nature.
17	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response:			•	
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping

Term 41: Reliable Operation



	•		_		
#	Commenter Organization	Segment	Group name	Y/N	Comment
					organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	<u>response</u> : Please see the dra	fting team re	sponse to your commer	it for Ter	m 4: Blackstart Resource.
20	John Allen – City Utilities of Springfield, Missouri	4		Yes	
SDT	response:				
21	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
22	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC generally supports the proposed revisions, but is unable to support the inclusion of the phrase "In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1]." The SRC notes that, since there are entities such as the IESO that are not under FERC's jurisdiction any revisions to the definition should respect the differing regulatory regimes in effect. The SRC suggests that this note be reworded as follows:



Organization The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities defined terms contained in this narrative are not capitalized.) Note that the					1	
The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities defined terms contained in this narrative are not capitalized.) Note that the "Bulk-Power System" or "Bulk Power System" shall have the same meaning. SDT response: In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the draft team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NE uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthe sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are t same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature. 25 Heather Morgan — 5 Yes EDP Renewables North America LLC SDT response: 26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response: 27 Linda Jacobson-Quinn — 3 Yes Linda Jacobson-Quinn — 3 Yes Linda Jacobson-Quinn — 3 Yes	#		Segment	Group name	Y/N	Comment
energy. (In order to remain consistent with applicable regulatory authorities defined terms contained in this narrative are not capitalized.) Note that the "Bulk-Power System" or "Bulk Power System" or "Bulk Power System" so consistent with the definition in the Federal Power Act, the draft team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NE uses capitalization to indicate a term has a defined meaning, Regardless of the capitalization, however, the important point is that the term is defined in the manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthe sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are t same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature. 25 Heather Morgan — 5 Yes EDP Renewables North America LLC SDT response: 26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response:		Organization				
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25 Heather Morgan — 5 Yes EDP Renewables North America LLC SDT response: 26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response: 27 Linda Jacobson-Quinn — 3 Yes City of Farmington SDT response:		· · · · · · · · · · · · · · · · · · ·		<u>~</u>		•
EDP Renewables North America LLC SDT response: 26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response: 27 Linda Jacobson-Quinn — 3 Yes City of Farmington SDT response:					,	
EDP Renewables North America LLC SDT response: 26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response: 27 Linda Jacobson-Quinn — 3 Yes City of Farmington SDT response:	25 Heat	ther Morgan –	5		Ves	
America LLC SDT response: 26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response: 27 Linda Jacobson-Quinn — 3 Yes City of Farmington SDT response:		_			103	
SDT response: 26 Shawna Speer —						
26 Shawna Speer — 1 Yes Colorado Springs Utilities SDT response: 27 Linda Jacobson-Quinn — 3 Yes City of Farmington SDT response:					1	
Colorado Springs Utilities SDT response: 27	3DT Tespoi	mse.				
Colorado Springs Utilities SDT response: 27	26 Shaw	una Caor	1		Voc	
SDT response: 27 Linda Jacobson-Quinn — 3		•	1		res	
27 Linda Jacobson-Quinn — 3 Yes City of Farmington SDT response:					<u> </u>	
City of Farmington SDT response:	SUI respon	onse:				
SDT response:	27 Linda	la Jacobson-Quinn –	3		Yes	
SDT response:	City	of Farmington				
		_				
28 Dan Wilson – 5 Yes						
	28 Dan	Wilson –	5		Yes	
PPL Electric Utilities	PPL	Electric Utilities				
Corporation						
SDT response:	•				1	
<u>55. 1.00p.0130.</u>	<u>551 (C5p0)</u>	<u></u>				
29 Yvonne McMackin – 4 Yes	29 Yvon	nne McMackin –	4		Yes	
Public Utility District No.	Publ	lic Utility District No.				
2 of Grant County,	2 of	Grant County,				
Washington	Was	shington				



#	Commenter Organization	Segment	Group name	Y/N	Comment
SDT	response:				
30	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	<u>response</u> :				
31	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	<u>response</u> :				
32	Mike Smith – Manitoba Hydro	1		No	Proposed changes to 6 (Bulk-Power System), 40 (Reliability Standard) and 41 (Reliable Operation) relating to the Federal Power Act are not made consistently. Redlined added text referencing the Federal Power Act should be consistently written for #6, #40, #41. Bulk-Power System should appear consistently in the definitions of #6, #40, #41. Defined terms should be written consistently. If using "reliable operation [Reliable Operation]", should also use same approach "facilities [Facility(ies)]" for all other
SDT	response: In an attempt to n	rovide clarity	that the defined term "	Bulk Dov	defined terms. ver System" is consistent with the definition in the Federal Power Act, the drafting

<u>SDT response</u>: In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.



#	Commenter Organization	Segment	Group name	Y/N	Comment
num whe inter liber part thes how	ber of capitalization issues wenthe term has the definition anded meaning of the definition ty to address capitalization is of Phase 2 of this project, the e issues. The drafting team we	ere identified al meaning; a on. However, sues if the ex e team will co vill provide its ofting team re	, including, but not limited, capitalization of a test the drafting team revisionisting definitions were an insider all of the capitalitecommendations to the commendations. The drag terms are the drag te	ted to: ca erm that ons were aligned (a zation iss ne Standa	of capitalization throughout the NERC defined terms. During the Phase 1 work, a apitalization of a term that is not a defined term; failure to capitalize a defined term is a defined term but should not be capitalized because it does not have the elimited to alignment of the <i>existing</i> definitions, and therefore the team was not at and the capitalization issue was present in both the ROP and Glossary definition). As sues identified during Phase 1 and develop recommendations for how to address ands Committee (SC) and NERC. It will be the decision of the SC and NERC regarding am encourages you to attend the next Project 2015-04 meeting which will focus on
33	Andrew Gallo – Austin Energy	6		Yes	
SDT	response:			·	
34	Rachel Coyne — Texas Reliability Entity, Inc.	10		Yes	In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.
term failu beca ther ROP reco deci: Proj	ns. During the Phase 1 work, a re to capitalize a defined terr luse it does not have the inte efore the team was not at lib and Glossary definition). As p mmendations for how to add sion of the SC and NERC rega ect 2015-04 meeting which w	a number of come when the tended meaning erty to address our of Phase dress these issuiding how to will focus on definition of the control of	apitalization issues were erm has the definitional g of the definition. How ss capitalization issues in 2 of this project, the tea sues. The drafting team best proceed with the d	e identifi meaning ever, the f the exis am will co will prov lrafting to e 2 recor	ere should be consistency in the use of capitalization throughout the NERC defined ed, including, but not limited to: capitalization of a term that is not a defined term; g; and, capitalization of a term that is a defined term but should not be capitalized e drafting team revisions were limited to alignment of the <i>existing</i> definitions, and sting definitions were aligned (and the capitalization issue was present in both the consider all of the capitalization issues identified during Phase 1 and develop ide its recommendations to the Standards Committee (SC) and NERC. It will be the earn recommendations. The drafting team encourages you to attend the next immendations.
35	Yuguang Xiao – Manitoba Hydro	5		No	
SDT	response:				
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<u>SDT</u>	response:	1		1	



			ı		
#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
				1	
37	Martin Boisvert –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	response:				
		_		1	
38	Erika Doot –	5		Yes	
	U.S. Bureau of				
	Reclamation				
<u>SDT</u>	response:				
		I	T		
39	Jason Smith –	2	SPP Standards	Yes	There is continued question regarding the correct usage of the terms Bulk-Power
	Southwest Power Pool,		Review Group		System and Bulk-Electric System in both definitions, ROP, and the Functional
	Inc. (RTO)				Model. In Phase 2, effort should be made to ensure alignment is correct among
					these terms. We should not continue using the phrase Bulk-Power System in
					certain definitions just because that phrase was loosely used (and prior to the
					Bulk-Electric System definition work) in order 693.
			•		garding inconsistent or improper usage of the terms Bulk Electric System (BES) and
					mmending that an effort is undertaken to review and assess usage of the terms BES
and	BPS throughout the Reliabilit	y Standards, (Glossary, and ROP to ei	nsure pro	per usage and application given the particular context.
		I	T	1	
40	Manon Paquet –	1, 5		Yes	
	On Behalf of: Roger				
	Dufresne, Hydro-Quebec				
	Production				
SDT	response:				
		I	T		
41	Robert A. Schaffeld –	1		Yes	
	Southern Company -				
	Southern Company				
	Services, Inc.				
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	There needs to be consistency with the use of brackets to signify Glossary/ROP terms that are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The "Reliable Operation" definition uses brackets for the term [Bulk-Power System]. However, the "Bulk-Power System" definition does not use brackets and Glossary/ROP terms are lower case.

<u>SDT response</u>: In an attempt to provide clarity that the defined term "Bulk Power System" is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

Andy Bolivar –	1		Yes	
Power and Light Co.				
response:				
Kathleen Black –	3,4,5		Yes	
DTE Energy				
response:				
Jennifer Losacco –	1		Yes	
	NextEra Energy - Florida Power and Light Co. response: Kathleen Black — DTE Energy response:	NextEra Energy - Florida Power and Light Co. response: Kathleen Black — 3,4,5 DTE Energy response:	NextEra Energy - Florida Power and Light Co. response: Kathleen Black — 3,4,5 DTE Energy response:	NextEra Energy - Florida Power and Light Co. response: Kathleen Black — 3,4,5 DTE Energy response:



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	<u>response</u> :				
46	Jared Shakespeare –	1		Yes	
	Peak Reliability				
SDT	<u>response</u> :				
47	Tony Eddleman –	3		Yes	
	Nebraska Public Power				
	District				
<u>SDT</u>	<u>response</u> :				
48	Bernard Johnson –	5		Yes	
	Oglethorpe Power				
	Corporation				
<u>SDT</u>	<u>response</u> :				
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	No	[1] See Duke Energy's comment for Term 40, Reliability Standard.
	Duke Lifelgy				[2] Also, we suggest adding "NERC" and "(system and elements)" as shown below, to improve clarity.
					"Reliable Operation:
					Operating the elements of the bulk-power system [Bulk- Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. (In order to remain consistent with the Federal Power Act, NERC defined terms (system and elements) contained in this narrative are not capitalized.)"

team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC

Project 2015-04 - Alignment of Terms | Consideration of Comments

Term 41: Reliable Operation



#	Commenter	Segment	Group name	Y/N	Comment		
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50	Andrea Jessup – Bonneville Power	1,3,5,6		Yes			
	Administration						
SDT	<u>response</u> :						
51	Patrick Brown - Canadian Electricity Association			No	Same comment as for term #6 (Bulk-Power System) and term #40 (Reliability Standard) above re: need for qualifier to clarify that the Federal Power Act is a U.S. statute.		
	response: Thank you for your er Act.	r comment. Ir	n response to your conce	erns, the	drafting team removed the parenthetical containing the reference to the Federal		

End of Report



Consideration of Comments Term 42: Reserve Sharing Group

Project Name: 2015-04 Alignment of Terms **Comment Period Start Date:** 6/13/2015

Comment Period End Date: 7/27/2015

Associated Ballot: Term 42: Reserve Sharing Group

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	N/A	5	
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	NPCC	5	
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	ompliance SERC	
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	SERC	1,3	
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	NPCC	5	

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	rian Robinson Utility Services		
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	a Parada Mitchell NextEra Energy, LLC		5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	len Watkins Sunflower Electric Power Corporation		
John Allen	SPP	1,4	
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4	
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 42: Reserve Sharing Group (redline)

Reserve Sharing Group:

A group whose members consist of two or more Balancing Authorities that collectively maintain, allocate, and supply operating reserves required for each Balancing Authority's use in recovering from contingencies within the group. Scheduling energy from an Adjacent Balancing Authority to aid recovery need not constitute reserve sharing provided the transaction is ramped in over a period the supplying party could reasonably be expected to load generation in (e.g., ten minutes). If the transaction is ramped in quicker (e.g., between zero and ten minutes) then, for the purposes of Disturbance disturbance Control Control Performanceperformance, the Areas areas become a Reserve Sharing Group.

The SDT is recommending changes to both the Glossary and ROP definitions. Specifically, the SDT is proposing to revise the Glossary definition by removing the capitalization for the terms "Disturbance Control Performance" and "Area" because these are not defined terms. (Note that Disturbance Control Standard and Disturbance are both defined terms). Also, in the ROP definition, the SDT is proposing removal of the unnecessary commas to align with the Glossary definition.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	response:								
3	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	SDT response:								
4	Mary Claire Yatsko –	1,3,4,5,6		Yes					



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Seminole Electric				
	Cooperative, Inc.				
SDT	response:			•	
					
5	John Seelke –	1,2,5,6 -	PSEG	Yes	
	PSEG				
SDT	response:				
					
6	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.				
SDT	response:				
					
7	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:			•	
					
8	Dennis Minton –	1		Yes	
	Florida Keys Electric				
	Cooperative Assoc.				
SDT	response:				
	-				
9	Rob Collins –	1, 6, 5, 3		Yes	
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDT	response:			·	
10	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	response:				
11	Lee Pedowicz –	10	NPCCProject 2015-	No	Disturbance should be capitalized because it is a defined term in the NERC
			04		Glossary.
		1		1	-



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Northeast Power				
	Coordinating Council			L	
			· · · · · · · · · · · · · · · · · · ·		ve the term "disturbance" was the stand-alone term within the definition of Reserve
				•	ormance" since this is the term utilized within the NERC Reliability Standard BAL-
	· · · · · · · · · · · · · · · · · · ·		•		ention as the term "disturbance control performance." To the extent that you ing team suggests submitting a SAR to address the issue.
belle	eve disturbance control perio	Jilliance Sho	dud be a defined term,	tile urait	ing team suggests submitting a SAK to address the issue.
12	Joe O'Brien –	6		Yes	
12	NiSource - Northern	O		103	
	Indiana Public Service Co.				
SDT	response:				
					
13	Andrew Pusztai –	1		Yes	
	American Transmission				
	Company, LLC				
SDT	response:				
		T			
14	Matthew Beilfuss –	3,4,5,6		Yes	
CDT	WEC Energy Group, Inc.				
<u>201</u>	<u>response</u> :				
15	Dennis Chastain –	1,3,5,6		No	For alignment purposes, we agree with the proposed change to the Glossary
	Tennessee Valley				definition.
	Authority				
					[1] For form consistency with other entity type definitions contained in the
					Glossary, we recommend starting the definition with "An entity, consisting of two
					or more Balancing Authorities, that" rather than "A group whose members
					consist of two or more Balancing Authorities that".
					[2] We also recommend capitalization of the terms "Operating Peser yes"
					[2] We also recommend capitalization of the terms "Operating Reserves", "Contingencies", and "Transaction" within the Reserve Sharing Group (RSG)
					definition because these terms are defined in the Glossary and we believe their
					usage in the RSG definition narrative is intended to have the meaning of the
					defined terms.



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#	Commenter	Segment	Group name	Y/N	Comment					
	Organization									
SDT	response:									
[1] T	hank you for your comment	s. The drafting	team agrees that, whe	en possibl	le, there should be consistency in sentence structure throughout the NERC defined					
term	ns. As part of Phase 2 of this	project, the di	rafting team will develo	p recomr	mendations to prevent future misalignment or inconsistencies in NERC defined					
term	erms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2									
reco	recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the									
reco	mmendations.									
[2] T	he drafting team agrees tha	t there should	be consistency in the u	ise of cap	oitalization throughout the NERC defined terms. During the Phase 1 work, a number					
	•			•	tion of a term that is not a defined term; failure to capitalize a defined term when					
			•		fined term but should not be capitalized because it does not have the intended					
	· · · · · · · · · · · · · · · · · · ·		——————————————————————————————————————		o alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to					
					pitalization issue was present in both the ROP and Glossary definition). As part of					
					entified during Phase 1 and develop recommendations for how to address these					
					ommittee (SC) and NERC. It will be the decision of the SC and NERC regarding how to					
best	proceed with the drafting to	am recomme	ndations. The drafting t	team enc	ourages you to attend the next Project 2015-04 meeting which will focus on					
deve	elopment of the Phase 2 reco	mmendations	S.							
				_						
16	Jared Shakespeare –	1		Yes						
	Peak Reliability									
SDT	response:									
17	Kaleb Brimhall –	5	Colorado Springs	Yes	We support the Comments Submitted by the Southwest Power Pool.					
	Colorado Springs Utilities		Utilities							
SDT	response: Please see the dra	afting team re	sponse to comments su	bmitted	by the Southwest Power Pool.					
18	Terry Bilke –	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the					
	Midcontinent ISO, Inc.				team and are generally don't have concerns with the definitions presented, this					
					appears to be just the start of a much wider effort that will provide little benefit					
					and additional churn of the standards just when we are trying to stabilize them.					
					From a standards process perspective, we had concerns with the SAR and the					
					meeting notes from the team. The "Detailed Description" section of the SAR says					
					it is a non-exhaustive, illustrative listing of the types of work that will be					
					undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes					
L				l .	and the state of t					



#	Commenter Organization	Segment	Group name	Y/N	Comment
					imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	ofting team res	sponse to your commen	t for Ter	m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
SDT	response:				
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
21	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
22	Si Truc Phan –	1		Yes	



				_	
#	Commenter Organization	Segment	Group name	Y/N	Comment
	Hydro-Quebec TransEnergie				
SDT	response:	<u>'</u>	,	1	
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
SDT	response:				
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	response:				
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
SDT	response:				
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:				
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	response:				
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	response:			·	
31	Mike Smith – Manitoba Hydro	1		Yes	
SDT	response:			·	
32	Andrew Gallo – Austin Energy	6		Yes	
SDT	<u>response</u> :				
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
SDT	response:				
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
SDT	<u>response</u> :				
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				



#	Commenter	Segment	Group name	Y/N	Comment
	Organization			1	
36	Martin Boisvert –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	response:				
37	Erika Doot –	5		Yes	
	U.S. Bureau of				
	Reclamation				
SDT	response:				
38	Jason Smith –	2	SPP Standards	No	[1] We disagree with the removal of the capitalization on Disturbance in the
	Southwest Power Pool,		Review Group		definition. Removing the capitalization opens up the applicability to disturbances
	Inc. (RTO)				that are not bound by the clarifications afforded by using the defined term.
					[2] Also, the terms Operating Reserve, Contingency, Transaction, and Ramp are
					defined terms and should be reviewed for capitalization in the definition in Phase
					2.
CDT	rechance.				

SDT response:

[1] Thank you for your comments. The drafting team did not believe the term "disturbance" was the stand-alone term within the definition of Reserve Sharing Group. The drafting team felt the term was "disturbance control performance" since this is the term utilized within the NERC Reliability Standard BAL-002. Therefore capitalization of "disturbance" would not convey the same intention as the term "disturbance control performance." To the extent that you believe "disturbance control performance" should be a defined term, you might consider submitting a SAR outlining the issues and your proposed recommendations for resolving those issues.

[2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

	3 ,		Ü	·
39	Manon Paquet –	1, 5	Yes	



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
	On Behalf of: Roger						
	Dufresne, Hydro-Quebec						
	Production						
SDT	<u>response</u> :						
40	Robert A. Schaffeld –	1		Yes			
	Southern Company -						
	Southern Company						
	Services, Inc.						
SDT	<u>response</u> :						
41	Ben Engelby –	6	ACES Standards	No	[1] "Operating Reserves," "Contingency," "Transaction," and "Ramp" are defined		
	ACES Power Marketing		Collaborators -		terms and the drafting team should consider if the terms should be capitalized.		
	J		Terms Project				
			•		[2] The drafting team should consider replacing "disturbance control		
					performance" with "Disturbance Control Standard" in both the Glossary and ROP.		
[1] Trevi wer capi to tl The							
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes			
SDT	response:						



#	Commenter Organization	Segment	Group name	Y/N	Comment
43	Kathleen Black – DTE Energy	3,4,5		Yes	
SDT	response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
46	Tony Eddleman – Nebraska Public Power District	3		No	I support SPP comments.
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
SDT	response:				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Operating Reserve", as it is currently a defined term.
SDT	response: The drafting team	agrees that t	here should be consister	ncy in th	e use of capitalization throughout the NERC defined terms. However, the drafting

SDT response: The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
SDT	response:				

End of Report

17



Consideration of Comments Term 43: Resource Planner

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 43: Resource Planner

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva Buckeye Power, Inc. RFC 4	
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 43: Resource Planner (redline)

Resource Planner:

The entity that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority Areaarea.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term "Area" because it is not a defined term in Glossary or the ROP.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	<u>response</u> :				
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	response:				
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
SDT	response:				
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:				
5	John Seelke –	1,2,5,6	PSEG	Yes	



#	Commenter	Segment	Group name	Y/N	Comment
"	Organization	Jeginene	Group name	.,	Comment
	PSEG				
SDT	response:			l	
	 _				
6	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.				
SDT	response:				
7	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:				
		T		ı	
8	Dennis Minton –	1		Yes	
	Florida Keys Electric				
	Cooperative Assoc.				
SDT	response:				
		T		1	
9	Rob Collins –	1, 6, 5, 3		Yes	
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDI	<u>response</u> :				
10	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	response:				
11	Lee Pedowicz –	10	NPCCProject 2015-	No	Loads should be capitalized.
	Northeast Power		04		
	Coordinating Council				
SDT	response: Thank you for your	r comments :	The drafting team agree	s that th	ere should be consistency in the use of capitalization throughout the NERC defined

<u>SDT response</u>: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the



Commenter Organization	Segment	Group name	Y/N	Comment			
ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.							
Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes				
response:							
Andrew Pusztai – American Transmission Company, LLC	1		Yes				
response:							
Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes				
response:							
Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. [1] We also recommend capitalization of the terms "Adequacy", "Loads", and "Demand" within the Resource Planner (RP) definition because these terms are defined in the Glossary and we believe their usage in the RP definition narrative is intended to have the meaning of the defined terms. [2] While perhaps beyond the scope of this project, we also believe the definition should be modified to say "within a Balancing Authority Area or Planning Authority area."			
	Organization and Glossary definition). As pure mendations for how to add sion of the SC and NERC regardect 2015-04 meeting which we seet 2015-04 meeting which we see the see the seet 2015-04 meeting which we see the	Organization and Glossary definition). As part of Phase mmendations for how to address these issison of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the SC and NERC regarding how to ect 2015-04 meeting which will focus on description of the S	Organization and Glossary definition). As part of Phase 2 of this project, the teammendations for how to address these issues. The drafting team vision of the SC and NERC regarding how to best proceed with the direct 2015-04 meeting which will focus on development of the Phase	Organization and Glossary definition). As part of Phase 2 of this project, the team will commendations for how to address these issues. The drafting team will provision of the SC and NERC regarding how to best proceed with the drafting teat ect 2015-04 meeting which will focus on development of the Phase 2 recording and provided in the Phase 2 recording to the Phase 2			

SDT response:

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because



#	Commenter Organization	Segment	Group name	Y/N	Comment			
the final Gloss recordecis Projection [2] True com	it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. [2] The drafting team agrees that the proposed revisions are outside the scope of this project. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.							
16	Jared Shakespeare – Peak Reliability	1		Yes				
SDT	SDT response:							
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	No	We support the Comments Submitted by the Southwest Power Pool.			
SDT	response: Please see the dra	fting team re	sponse to comments sul	bmitted	by the Southwest Power Pool.			
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.			



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
					A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on
					whether it is a Standards or RoP (or any other source document) term. Even if
					NERC were to align terms in every single document, you will have different
					definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort,
					particularly when you look at how this is broken up into dozens of ballots. It's just
					not clear how this is helping and what will be the next project tackled by the
					team.
SDT	response: Please see the dra	fting team re	sponse to your commen	t for Ter	m 4: Blackstart Resource.
19	John Allen –	4		No	See comments from SPP Standards Review Group.
	City Utilities of				
	Springfield, Missouri				
SDT	<u>response</u> :				
20	Jeremy Voll –	3		Yes	
	Basin Electric Power				
	Cooperative				
SDT	<u>response</u> :				
21	Lee Schuster –	3		Yes	
	Duke Energy				
SDT	<u>response</u> :				
22	Si Truc Phan –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	<u>response</u> :				
23	Christina Bigelow –	2	IRC Standards	Yes	The SRC has previously commented that there needs to be total consistency
			Review Committee		between all fundamental documents within NERC. Thus, while it does not



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Electric Reliability Council				disagree with the proposed changes, it recommends that the SDT take this
	of Texas, Inc.				opportunity to also synchronize this definition with the Functional Model.
SDT	response: Thank you for you	ir comments;	however, modifications	to the F	unctional Model fall outside the permissible scope of the work for this project. As
this Mod asso inco	project, the drafting team wildel to incorporate the industry ciated Technical Documents a	ll make a reco y-approved ali at the directio reliability relat	mmendation to the Sta gnment revisions. Note n of the Standards Com ed tasks. The drafting t	ndards C that the imittee (the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of Committee that the Functional Model Advisory Group (FMAG) update the Functional de purpose of the FMAG is to maintain the NERC Reliability Functional Model and the SC) to ensure the model correctly reflects the industry today and evaluates and only encourages you to attend the next Project 2015-04 meeting which will focus on
24	Heather Morgan –	5		Yes	
2-	EDP Renewables North	3		103	
	America LLC				
SDT	response:				
<u> </u>	<u>response</u> .				
25	Shawna Speer –	1		No	Reference the group comments - Colorado Springs Utilities.
	Colorado Springs Utilities				
SDT	response:				
26	Linda Jacobson-Quinn –	3		Yes	
	City of Farmington				
SDT	response:				
27	Dan Wilson –	5		Yes	
	PPL Electric Utilities				
	Corporation				
SDT	response:				
28	Yvonne McMackin –	4		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment		
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes			
SDT	response:						
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes			
SDT	response:			·			
31	Mike Smith – Manitoba Hydro	1		Yes			
SDT	response:			·			
32	Andrew Gallo – Austin Energy	6		Yes			
SDT	<u>response</u> :						
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes			
SDT	response:						
34	Yuguang Xiao – Manitoba Hydro	5		Yes			
SDT	<u>response</u> :						
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes			
SDT	SDT response:						



#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
SDT	response:				
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	response:				
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	 [1] The use of the term 'Planning Authority' should be discontinued and replaced with Planning Coordinator to be consistent with the Functional Model. Planning Authority no longer exists as an entity in the Functional Model. See comment on the definition for Planning Authority above. [2] Also, in a future Phase, a SAR and new definition should be created to define Planning Coordinator Area so there is consistency with the terms Balancing Authority Area, Transmission Operator Area, and Reliability Coordinator Area. See previous comments on Planning Authority definition. Planning Coordinator Area is a term used within FAC-013-2 and FAC-014-2 for example but has no definition.

SDT response:

[1] Your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Resource Planner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Resource Planner, Planning Authority or Planning Coordinator, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition or Reliability Standards.

[2] Thank you for your comments; however, the drafting team did not identify "Planning Authority Area" as one of the terms for which it will develop a SAR. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.

39 Manon Paquet –	1, 5	Yes	



					•					
#	Commenter Organization	Segment	Group name	Y/N	Comment					
	On Behalf of: Roger									
	Dufresne, Hydro-Quebec									
	Production									
SDT	SDT response:									
40	Robert A. Schaffeld –	1		Yes						
	Southern Company -									
	Southern Company									
	Services, Inc.									
SDT	<u>response</u> :									
41	Ben Engelby –	6	ACES Standards	No	"Adequacy," "Load," and "Demand" are defined terms and the drafting team					
	ACES Power Marketing		Collaborators -		should consider if they should be capitalized.					
			Terms Project							
SDT	response: Thank you for you	r comments.	The drafting team agree	s that th	ere should be consistency in the use of capitalization throughout the NERC defined					
term	ns. During the Phase 1 work, a	number of c	apitalization issues were	e identifi	ed, including, but not limited to: capitalization of a term that is not a defined term;					
failu	re to capitalize a defined term	n when the te	erm has the definitional	meaning	; and, capitalization of a term that is a defined term but should not be capitalized					
beca	use it does not have the inte	nded meanin	g of the definition. How	ever, the	drafting team revisions were limited to alignment of the <i>existing</i> definitions, and					
ther	efore the team was not at lib	erty to addre	ss capitalization issues if	f the exis	ting definitions were aligned (and the capitalization issue was present in both the					
ROP	and Glossary definition). As p	oart of Phase	2 of this project, the tea	am will co	onsider all of the capitalization issues identified during Phase 1 and develop					
reco	mmendations for how to add	lress these iss	sues. The drafting team	will prov	ide its recommendations to the Standards Committee (SC) and NERC. It will be the					
deci	sion of the SC and NERC rega	rding how to	best proceed with the d	rafting to	eam recommendations. The drafting team encourages you to attend the next					
Proj	ect 2015-04 meeting which w	ill focus on d	evelopment of the Phas	e <mark>2 rec</mark> or	nmendations.					
42	Andy Bolivar –	1		Yes						
	NextEra Energy - Florida									
	Power and Light Co.									
SDT	SDT response:									
43	Kathleen Black –	3,4,5		Yes						
	DTE Energy									
SDT	response:									
44	Jennifer Losacco –	1		Yes						
			L	1 . 55						



#	Commenter Organization	Segment	Group name	Y/N	Comment		
	NextEra Energy - Florida Power and Light Co.						
SDT	response:						
45	Jared Shakespeare – Peak Reliability	1		Yes			
SDT	response:						
46	Tony Eddleman – Nebraska Public Power District	3		Yes			
SDT	<u>response</u> :						
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes			
SDT	response:						
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes			
SDT	response:						
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes			
SDT	SDT response:						

End of Report



Consideration of Comments Term 48: System Operating Limit

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015

Comment Period End Date: 7/27/2015

Associated Ballot: Term 48: System Operating Limit

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

August 2015

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Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 48: System Operating Limit (redline)

System Operating Limit:

The value (such as MW, MVar, Aamperes, Frequency or Voltsvolts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:

- Facility Ratings (Applicable applicable pre- and post-Contingency equipment Equipment Ratings or facility Facility ratings Ratings)
- Transient_transient_Stability_stability_Ratings_ratings (Applicable_applicable_pre- and post-Contingency Stability stability_Limits)
- Voltage voltage Stability stability Ratings ratings (Applicable applicable pre- and post-Contingency voltage Stability Stability)
- System-system Voltage <u>Voltage</u> <u>Limits limits</u> (Applicable <u>applicable</u> pre- and post-Contingency <u>Voltage</u> <u>Voltage</u> <u>Voltage</u> <u>Limits</u> <u>Limits</u> (Applicable <u>applicable</u> pre- and post-Contingency <u>Voltage</u> <u>Vol</u>

The SDT is proposing revisions to the Glossary definition. Specifically, the SDT is proposing to revise the Glossary definition to lowercase those terms that are not defined terms, and thus, should not be capitalized in the definition narrative.

Do you agree with the proposed Glossary definition revisions? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata change (below is the balloted definition with a redline of the errata changes):

System Operating Limit:

The value (such as MW, <u>MVarMvar</u>, amperes, frequency or volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:

- Facility Ratings (applicable pre- and post-Contingency Equipment Ratings or Facility Ratings)
- transient stability ratings (applicable pre- and post-Contingency stability limits)
- voltage stability ratings (applicable pre- and post-Contingency voltage stability)
- system voltage limits (applicable pre- and post-Contingency voltage limits)



Explanation of errata change:

The drafting team made an alignment revision by changing "MVar" to "Mvar." This change aligns the Glossary definition with the ROP definition. The capitalization change is an errata change, not a substantive change.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	response:								
3	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	response:								
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes					
SDT	response:								
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes					
SDT	response:								
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes					
SDT	response:								
7	Thomas Foltz –	5		Yes					



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	AEP								
SDT	SDT response:								
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes					
SDT	response:								
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes					
SDT	response:								
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes					
SDT	response:								
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	"Facility Ratings" and "Equipment Ratings" should be capitalized in the Rules of Procedure to match the Glossary.				
work defir have Ratir defir to ac	SDT response: The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions. The terms "Facility Ratings" and "Equipment Ratings" are not defined terms in the ROP, and therefore the drafting team did not make these capitalization revisions to the ROP definition. As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.								
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes					



#	Commenter Organization	Segment	Group name	Y/N	Comment		
SDT	<u>response</u> :						
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes			
SDT	<u>response</u> :						
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes			
SDT	response:						
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. [1] We also recommend changing "MVar" to "MVAr". [2] The following suggestions may be beyond the scope of this project: 1) consider adding "MVA" to the examples of measured values contained in the first parenthetical; 2) consider removing "Equipment Ratings" from the first bulleted item. By definition, a Facility Rating should take into consideration the most limiting Equipment Rating of any equipment comprising the Facility. We also support the recommendation made by the Project 2015-03 Standard Drafting Team that a "FAC standards project develop revisions to the SOL definition and develop a new defined term for SOL Exceedance".		
	response:	Alata altauna	ak ana dada a manadakha a sa sa		water the control in a control in the the Classical definition		
[2] <i>A</i>	[1] The drafting team agrees with this alignment revision, and the suggested errata change was incorporated into the Glossary definition. [2] As noted in your comment, your proposed revisions are outside the scope of this project. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.						
16	Jared Shakespeare – Peak Reliability	1		Yes			
SDT	response:			•			



#	Commenter Organization	Segment	Group name	Y/N	Comment				
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.				
SDT	SDT response: Please see the drafting team response to comments submitted by the Southwest Power Pool.								
18 SDT	Terry Bilke – Midcontinent ISO, Inc. response: Please see the draft	2	sponse to your comme	No No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.				
וטצ		ting team res	sponse to your comme	nt for Teri					
19	John Allen –	4		Yes	See comments from SPP Standards Review Group.				



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	City Utilities of				
	Springfield, Missouri				
SDT	response:				
	- _				
20	Jeremy Voll –	3		Yes	
	Basin Electric Power				
	Cooperative				
SDT	response:	L	L		
21	Lee Schuster –	3		Yes	
	Duke Energy				
SDT	response:	1		1	
22	Si Truc Phan –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	response:			•	
23	Christina Bigelow –	2	IRC Standards	Yes	
	Electric Reliability Council		Review Committee		
	of Texas, Inc.				
SDT	response:			•	
24	Heather Morgan –	5		Yes	
	EDP Renewables North				
	America LLC				
SDT	response:				
25	Shawna Speer –	1		Yes	
	Colorado Springs Utilities				
SDT	response:				
26	Linda Jacobson-Quinn –	3		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	City of Farmington								
SDT	SDT response:								
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes					
SDT	response:								
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes					
SDT	response:								
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes					
SDT	response:								
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes					
SDT	response:								
31	Mike Smith – Manitoba Hydro	1		Yes					
SDT	SDT response:								
32	Andrew Gallo – Austin Energy	6		Yes					
SDT	response:								



#	Commenter Organization	Segment	Group name	Y/N	Comment
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	[1] Texas RE noticed inconsistency in capitalization (Facility Ratings/Equipment Ratings) in the ROP definition.
					[2] In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.

SDT response:

- [1] Please see the NERC response to ROP comments, which address all comments received for proposed revisions to the ROP definitions.
- [2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

34	Yuguang Xiao – Manitoba Hydro	5		Yes				
SDT	SDT response:							
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes				
SDT	SDT response:							
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes				
SDT	SDT response:							
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes				

August 2015



#	Commenter Organization	Segment	Group name	Y/N	Comment	
SDT	response:					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We agree with the proposed capitalization changes. We also wish to stress that future phases need to coordinate with future FAC SDT Projects in order to align any future revisions to this definition.	
	response: Thank you for you sary and ROP definitions are			ees that f	uture phases should coordinate with ongoing development projects to ensure that	
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes		
SDT	response:					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes		
SDT	response:	1	1			
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	The drafting team should consider the proposed changes to the definition of "System Operating Limit" in Project 2014-03. This definition may need to be postponed to accommodate for the work being done by the other drafting team.	
SDT response: Thank you for your comments. The drafting team agrees that future phases should coordinate with ongoing development projects to ensure that Glossary and ROP definitions are developed in alignment.						
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes		
SDT	response:					
43	Kathleen Black – DTE Energy	3,4,5		Yes		
<u>SDT</u>	response:					



#	Commenter Organization	Segment	Group name	Y/N	Comment				
44	Jennifer Losacco –	1		Yes					
	NextEra Energy - Florida								
	Power and Light Co.								
SDT	SDT response:								
45	Jared Shakespeare –	1		Yes					
	Peak Reliability	_							
SDT	response:								
46	Tony Eddleman –	3		Yes					
	Nebraska Public Power								
	District								
SDT	response:								
				1					
47	Bernard Johnson –	5		No					
	Oglethorpe Power								
	Corporation								
SDT	<u>response</u> :								
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes					
	Duke Energy								
SDT	response:								
49	Andrea Jessup –	1,3,5,6		Yes					
	Bonneville Power	_,,,,,							
	Administration								
SDT	response:								
50	Jennifer Wright - San	1		No	SDG&E recommends adding "or angle" to the parenthetical in Term 48, System				
	Diego Gas & Electric				Operating Limits: "(such as MW, MVar, amperes, frequency, volts or angle)."				
					Synchro phasors provide angle and angle difference. Angle values can also be				
					used as an SOL. In fact, angles may be a better value to monitor (than MW) when				
			I		used as an soc. In fact, angles may be a better value to monitor (than www) when				



#	Commenter	Segment	Group name	Y/N	Comment				
	Organization				trying to determine SOLs for transient stability issues. Synchro phasors are proliferating quickly. The addition of the angle as an SOL value will open the door to allow the use of synchro phasors for system monitoring purposes.				
SDT response: Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. To the extent that you believe the issue identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.									
51	Jason Snodgrass - Georgia Transmission Corporation	1		No	GTC agrees that the SOL definition as it stands is ambiguous and can lead to confusion. However, the proposed definition seems to equate reliability limits with SOLs which would make identification of SOLs unnecessary. SOLs should be identified as a necessary means to remain within applicable reliability limits for certain events specified by TPL-001-4. GTC does not recommend for the SOL definition simply be defined as facility ratings, voltage limits, transient stability ratings, or voltage stability ratings as proposed. The SOL definition should be related to corrective action for certain system configurations/conditions (as specified in TPL-001-4) where curtailment of firm service is necessary to avoid exceeding applicable reliability ratings. For example, an event specified by TPL-001-4 results in a generator's output being curtailed to avoid violating an applicable reliability limit, the amount the generator is being curtailed would be classified as an SOL. For this example, the SOL could occur in the operations or planning horizon.				

<u>SDT response</u>: Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.

End of Report



Consideration of Comments Term 49: Transmission Customer

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 49: Transmission Customer

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	SERC	5,6	

5



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 49: Transmission Customer (redline)

Transmission Customer:

- 1. Any eligible customer (or its designated agent) that can or does execute a <u>transmission_Transmission_service_Service_agreement</u> or can or does receive <u>transmission_Transmission_Service_Service_agreement</u>.
- 2. Any of the following responsible entities: Generator Owner, Load-Serving Entity, or Purchasing-Selling Entity.

The SDT is recommending the following changes:

- (1) Revise the Glossary definition to capitalize the term "Transmission Service" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.
- (2) Remove the word "responsible" to align with the ROP definition. The word "responsible" was originally included in the ROP definition, but was recently removed by the Risk-Based Registration project. The Glossary should be updated to reflect these recent changes.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment				
1	John Fontenot – Bryan Texas Utilities	1		Yes					
SDT	SDT response:								
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes					
SDT	<u>response</u> :								
3	Leonard Kula – Independent Electricity System Operator	2		Yes					
SDT	SDT response:								
4	Mary Claire Yatsko –	1,3,4,5,6		Yes					



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
	Seminole Electric				
	Cooperative, Inc.				
SDT	response:			•	
	 _				
5	John Seelke –	1,2,5,6	PSEG	Yes	
	PSEG				
SDT	response:				
	_				
6	Amy Casuscelli –	1,3,5,6		Yes	
	Xcel Energy, Inc.				
SDT	response:				
7	Thomas Foltz –	5		Yes	
	AEP				
SDT	response:				
8	Dennis Minton –	1		Yes	
	Florida Keys Electric				
	Cooperative Assoc.				
SDT	response:				
9	Rob Collins –	1, 6, 5, 3		Yes	
	On Behalf of: Scotty				
	Brown, Southern Indiana				
	Gas and Electric Co.				
SDT	response:				
10	Louis Slade –	6	Dominion	Yes	
	Dominion Resources, Inc.		Resources, Inc.		
SDT	response:				
11	Les De de Pe	40	NDCC Daries 2015		
11	Lee Pedowicz –	10	NPCCProject 2015-	Yes	
			04		



#	Commenter Organization	Segment	Group name	Y/N	Comment
	Northeast Power				
	Coordinating Council				
SDT	<u>response</u> :				
12	Joe O'Brien –	6		Yes	
	NiSource - Northern				
	Indiana Public Service Co.				
SDT	<u>response</u> :				
13	Andrew Pusztai –	1		Yes	
	American Transmission				
	Company, LLC				
SDT	response:				
14	Matthew Beilfuss –	3,4,5,6		Yes	
	WEC Energy Group, Inc.				
SDT	response:				
15	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary
	Tennessee Valley				definition.
	Authority				
					With the approval of the removal of the PSE entity from the NERC Compliance
					Registry, and the pending consideration of removal of the LSE function, it seems
					this definition should undergo further review that is perhaps beyond the scope of
					this Project.
SDT	response: Thank you for you	r comment: ho	owever, as acknowledge	ed in vou	ir comment, revising the definition to remove references to Load-Serving Entity and

<u>SDT response</u>: Thank you for your comment; however, as acknowledged in your comment, revising the definition to remove references to Load-Serving Entity and Purchase-Selling Entity is outside the scope of work for this project. The drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. For the term Transmission Customer, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP.

The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance Registry, as explained in further detail in the <u>RBR Petition</u> and <u>Compliance Filing</u>, the two terms nevertheless remain in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not



#	Commenter Organization	Segment	Group name	Y/N	Comment			
	nforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms re in fact no longer used in the Reliability Standards.							
as a		stration Initia	tive. As part of Phase		ding possible revisions that are needed for the Glossary and/or Reliability Standards roject, the team will consider whether a recommendation to the SC is needed to			
16	Jared Shakespeare – Peak Reliability	1		Yes				
SDT	response:			·				
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.			
SDT	response: Please see the dra	fting team res	sponse to comments s	ubmitted	by the Southwest Power Pool.			
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different			



				1	
#	Commenter Organization	Segment	Group name	Y/N	Comment
					definitions between NERC, FERC, IEEE, NAESB, and other overlapping
					organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort,
					particularly when you look at how this is broken up into dozens of ballots. It's just
					not clear how this is helping and what will be the next project tackled by the
					team.
SDT	<u>response</u> : Please see the dra	fting team res	sponse to your commen	it for Ter	m 4: Blackstart Resource.
19	John Allen –	4		No	See comments from SPP Standards Review Group.
	City Utilities of				
	Springfield, Missouri			<u> </u>	
SDI	<u>response</u> :				
20	Jeremy Voll –	3		Yes	
	Basin Electric Power				
SDT	Cooperative response:				
301	response.				
21	Lee Schuster –	3		Yes	
CDT	Duke Energy				
<u>SD1</u>	<u>response</u> :				
22	Si Truc Phan –	1		Yes	
	Hydro-Quebec				
CDT	TransEnergie				
301	<u>response</u> :				
23	Christina Bigelow –	2	IRC Standards	Yes	
	Electric Reliability Council		Review Committee		
CDT	of Texas, Inc.			<u> </u>	
וחצ	response:				
24	Heather Morgan –	5		Yes	



#	Commenter	Segment	Group name	Y/N	Comment
••	Organization	3cgc.ii	Group name	.,	comment
	EDP Renewables North				
	America LLC				
SDT	response:				
25	Shawna Speer –	1		No	Reference the group comments - Colorado Springs Utilities.
	Colorado Springs Utilities				
SDT	<u>response</u> :				
26	Linda Jacobson-Quinn –	3		Yes	
	City of Farmington				
SDT	response:				
				<u> </u>	
27	Dan Wilson –	5		Yes	
	PPL Electric Utilities				
CDT	Corporation				
<u>301</u>	<u>response</u> :				
28	Yvonne McMackin –	4		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	<u>response</u> :				
29	Michiko Sell –	1		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	<u>response</u> :				
30	Alex Ybarra –	5		Yes	
	Public Utility District No.				
	2 of Grant County,				
	Washington				
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment			
31	Mike Smith – Manitoba Hydro	1		Yes				
SDT	response:			•				
32	Andrew Gallo – Austin Energy	6		Yes				
SDT	response:							
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes				
SDT	response:	•						
34	Yuguang Xiao – Manitoba Hydro	5		No				
SDT	response:							
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes				
SDT	response:							
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes				
SDT	SDT response:							
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes				
SDT	response:							



#	Commenter Organization	Segment	Group name	Y/N	Comment
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	The term 'Purchasing-Selling Entity' has been retired from the NERC Reliability Functional Model and should be removed from the definition. Future retirement of the term Load-Serving Entity from the NERC Reliability Functional Model and NERC Glossary may require a future change.

<u>SDT response</u>: Thank you for your comment; however, revising the definition to remove references to Load-Serving Entity and/or Purchase-Selling Entity is outside the scope of work for this project. The drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. For the term Transmission Customer, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP.

The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance Registry, as explained in further detail in the <u>RBR Petition</u> and <u>Compliance Filing</u>, the two terms nevertheless remain in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.

During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.

39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes				
SDT	SDT response:							
	 _							
40	Robert A. Schaffeld –	1		Yes				
	Southern Company -							
	Southern Company							
	Services, Inc.							
SDT	response:							
41	Ben Engelby –	6	ACES Standards	No	We recommend removing the Purchasing-Selling Entity from the definition, as this			
	ACES Power Marketing		Collaborators -		is no longer a registered function (effective March 19, 2015). The proposed			
			Terms Project		revisions to "Transmission Customer" may need to be postponed until there is			



SDT response:

#	Commenter Organization	Segment	Group name	Y/N	Comment
					certainty regarding the outcome of the retirement of the LSE. If both the LSE and PSE retire, the second bullet would result in only a GO being a responsible entity.
the s	scope of work for this projec	t. The drafting afting team was	team revisions were ling not at liberty to revise	mited to a	o remove references to Load-Serving Entity and/or Purchase-Selling Entity is outside alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other initions. For the term Transmission Customer, the drafting team proposed revising
Regi pend enfo term Duri as a	istry, as explained in further of ding, or subject to future enforceable with respect to that ms are in fact no longer used ing phase 1 of this project, a	detail in the <u>RB</u> orcement. Whi entity (see RBF in the Reliabilit number of comistration Initiat	R Petition and Compliance any Reliability Standards. R Petition at 20), it is not y Standards. Remembers raised concertive. As part of Phase 2	ance Filin lard requ ot approp	moved Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance g, the two terms nevertheless remain in several Reliability Standards that are active, irement that references an entity proposed for deactivation will be moot and not oriate to remove these defined terms from the NERC Glossary until the defined ding possible revisions that are needed for the Glossary and/or Reliability Standards roject, the team will consider whether a recommendation to the SC is needed to
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:	, T			
43	Kathleen Black – DTE Energy	3,4,5		Yes	
SDT	response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<u>SDT</u>	<u>response</u> :				
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests the drafting team consider whether the inclusion of the Purchasing-Selling Entity should be removed in light of FERC approval regarding Risk Based Registration. The same could be said for the use of the term Load Serving Entity as well, depending on a ruling from FERC.
the s than	scope of work for this project	t. The drafting fting team wa	team revisions were list not at liberty to revis	imited to a se the defi	o remove references to Load-Serving Entity and/or Purchase-Selling Entity is outside alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other initions. For the term Transmission Customer, the drafting team proposed revising
Regi pend enfo	stry, as explained in further of ding, or subject to future enfo	detail in the <u>RI</u> orcement. Wh entity (see RB	BR Petition and <u>Compl</u> lile any Reliability Stan R Petition at 20), it is r	iance Filin dard requ	moved Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance g, the two terms nevertheless remain in several Reliability Standards that are active, irement that references an entity proposed for deactivation will be moot and not priate to remove these defined terms from the NERC Glossary until the defined
as a		stration Initia	tive. As part of Phase 2		ding possible revisions that are needed for the Glossary and/or Reliability Standards roject, the team will consider whether a recommendation to the SC is needed to

Yes

SDT response: End of Report

Andrea Jessup –

Bonneville Power Administration

1,3,5,6



Consideration of Comments Term 50: Transmission Operator

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballot: Term 50: Transmission Operator

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

August 2015



Ali Miremadi	CAISO	WECC	2

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region Segmen		
Shannon Mickens	Southwest Power Pool	SPP	2	
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4	
Kevin Giles	Westar Energy	SPP	1,3,5,6	
Robert Hirchak	Cleco Power	SPP	1,3,5,6	
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1	
Jason Smith	Southwest Power Pool	SPP	2	
Mahmood Safi	Omaha Public Power District	MRO	1,3,5	
Don Schmit	Nebraska Public Power District	MRO	1,3,5	
Ellen Watkins	SPP	1		
John Allen	City Utilities of Springfield Missouri	SPP	1,4	
Louis Guidry	SPP	1,3,5,6		

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	SERC	5,6	



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 50: Transmission Operator (redline)

Transmission Operator:

The entity responsible for the reliability of its "local" transmission system, and that operates or directs the operations of the transmission facilities.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Facilities" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment		
1	John Fontenot – Bryan Texas Utilities	1		Yes			
SDT	SDT response:						
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes			
SDT	SDT response:						
3	Leonard Kula – Independent Electricity System Operator	2		Yes	While we agree with the proposed change, the definition in the NERC Glossary and the proposed edit, are inconsistent with the definition presented in the Functional Model. We suggest the SDT to either adopt the FM definition, or to revise the definition in the FM to achieve total consistency.		

<u>SDT response</u>: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:			1	
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
SDT	response:				
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
SDT	response:			·	
7	Thomas Foltz – AEP	5		Yes	
SDT	response:				
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
SDT	response:				
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
SDT	response:				
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion recommends that the word 'transmission' should also be capitalized as it too is a defined term in the NERC Glossary.
<u>SDT response</u> : Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term;					

Project 2015-04 - Alignment of Terms | Consideration of Comments Term 50: Transmission Operator August 2015



# Commenter Organization	Segment	Group name	Y/N	Comment				
failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.								
11 Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	[1] In addition to Facilities, Transmission should be capitalized. [2] Suggest to clearly define 'Facilities' to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.				
Joe O'Brien – NiSource - Northern	6		Yes					
Indiana Public Service Co. SDT response:								



#	Commenter Organization	Segment	Group name	Y/N	Comment
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<u> 201</u>	<u>response</u> :				
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
SDT	response:				
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with "The entity that reliably operates its "local" Transmission system," rather than "The entity responsible for the reliability of its "local" transmission system,". We also recommend capitalization of the term "Transmission" within the Transmission Operator (TOP) definition because this term is defined in the Glossary and we believe its usage in the TOP definition narrative is intended to have the meaning of the defined term.
thro capit that team relat be th	ughout the NERC defined ter talization of a term that is no is a defined term but should n will develop recommendatized to the issues identified in the decision of the SC and NEF 5-04 meeting which will focus	ms. For examp tadefined terronot be capitalions to prevent your comment RC regarding ho	le, during the Phase 1 vm; failure to capitalize zed because it does not future misalignment of the drafting team wow to best proceed wit	work, a radefine thave the inconsition of the received and the received an	nere should be consistency in form, sentence structure and capitalization number of capitalization issues were identified, including, but not limited to: different when the term has the definitional meaning; and, capitalization of a term ne intended meaning of the definition. As part of Phase 2 of this project, the drafting istencies in NERC defined terms. The drafting team will develop recommendations de its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will commendations. The drafting team highly encourages you to attend the next Project idations.
16	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment			
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.			
SDT	FDT response: Please see the drafting team response to comments submitted by the Southwest Power Pool.							
18	Terry Bilke – Midcontinent ISO, Inc.	2		No No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.			
SDT	response: Please see the dra	rting team re	sponse to your commer	nt for Ter	m 4: Blackstart Resource.			
19	John Allen –	4		Yes				



#	Commenter Organization	Segment	Group name	Y/N	Comment			
	City Utilities of							
	Springfield, Missouri							
SDT	<u>response</u> :							
20	Jeremy Voll –	3		Yes				
	Basin Electric Power							
	Cooperative							
SDT	<u>response</u> :							
21	Lee Schuster –	3		Yes				
	Duke Energy							
SDT	response:							
22	Si Truc Phan –	1		No	Suggest to clearly define 'Facilities' to prevent the confusion from TOP versus			
	Hydro-Quebec				GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6			
	TransEnergie				and 7, but the revisions should be done under this project.			
exist revis team	ing language in the Glossary aions). However, as part of Ph	and ROP defir ase 2 for this	nitions, the drafting tean project, the drafting tea	n did no m will d	build be improved. Because the SAR limits this drafting team to alignment of the t propose substantive language revisions to any definitions (other than alignment evelop a SAR to revise the definition of Facilities to address the issues identified by indards Committee (SC) in accordance with the procedure outlined in the Standards			
23	Christina Bigelow –	2	IRC Standards	Yes	The SRC has previously commented that there needs to be total consistency			
	Electric Reliability Council		Review Committee		between all fundamental documents within NERC. Thus, while it does not			
	of Texas, Inc.				disagree with the proposed changes, it recommends that the SDT take this			
					opportunity to also synchronize this definition with the Functional Model.			
· ·					unctional Model fall outside the permissible scope of the work for this project. As the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of			
					ommittee that the Functional Model Advisory Group (FMAG) update the Functional			
					e purpose of the FMAG is to maintain the NERC Reliability Functional Model and the			
	associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and							
	•	•		eam high	nly encourages you to attend the next Project 2015-04 meeting which will focus on			
deve	elopment of the Phase 2 reco	mmendations	.					
24	Hoathar Margan	5		Voc				
24	Heather Morgan –	<u> </u>		Yes				



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	EDP Renewables North America LLC								
SDT	response:								
									
25	Shawna Speer – Colorado Springs Utilities	1		Yes					
SDT	<u>response</u> :								
26	Linda Jacobson-Quinn – City of Farmington	3		No	The NERC Functional Model defined Transmission Operator as "The functional entity that ensures the Real-time operating reliability of the transmission assets within a Transmission Operator Area."				
					The SDT and NERC should consider the implications of this term as it has caused some confusion in the application of CIP-002-5 which classifies "Control Centers performing the functional obligations of a Transmission Operator" as medium facilities even if they ARE NOT registered as a TOP. However, if a control center simply 'operates' a Transmission Facility (under the direction of another Registered TOP) that should be considered performing the function of a TOP.				
the diden	SDT response: Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR or Request for Interpretation (RFI) outlining the issues and your proposed recommendations for resolving those issues.								
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes					
SDT	response:								
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes					
SDT	response:								



#	Commenter Organization	Segment	Group name	Y/N	Comment				
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes					
SDT	response:								
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes					
SDT	response:								
31	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".				
					Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.				
term term reco reco	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.								
32	Andrew Gallo – Austin Energy	6		Yes					
SDT	response:								
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes					
SDT	response:								



#	Commenter Organization	Segment	Group name	Y/N	Comment
34	Yuguang Xiao – Manitoba Hydro	5		No	
SDT	<u>response</u> :				
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
SDT	response:				
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	See comments from NPCCProject 2015-04.
	response: se see response to [#11]				
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
SDT	response:	•			
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	Agree with the capitalization change. However please review comment on the definition for Reactive Power. The term "transmission facilities" is used in that definition and Facilities should be capitalized there as well. It seems the proposed changes between this definition and Reactive Power are using different logic to determine whether Facilities should be capitalized. Additionally, the word "system" in this definition may need to be capitalized as well.

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.



#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1,5		No	[1] In addition to Facilities, Transmission should be capitalized.[2] Suggest to clearly define 'Facilities' to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in
					Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.

SDT response:

[1] Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.

[2] The drafting team recognizes that the definition of "Facilities" could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.

Robert A. Schaffeld –	1		Yes			
Southern Company -						
Southern Company						
Services, Inc.						
SDT response:						
5	Southern Company - Southern Company Services, Inc.	Southern Company - Southern Company Services, Inc.	Southern Company - Southern Company Services, Inc.	Southern Company - Southern Company Services, Inc.		

41	Ben Engelby –	6	ACES Standards	No	"Transmission" and "System" are defined terms and the drafting team should
	ACES Power Marketing		Collaborators -		consider if they should be capitalized.
			Terms Project		

<u>SDT response</u>: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term;



#	Commenter Organization	Segment	Group name	Y/N	Comment
ther ROP reco	euse it does not have the inte efore the team was not at lib and Glossary definition). As immendations for how to add	ended meaning perty to addres part of Phase 2 dress these iss rding how to b	g of the definition. How is capitalization issues it 2 of this project, the tea ues. The drafting team pest proceed with the d	ever, the f the exis am will co will prov rafting to	g; and, capitalization of a term that is a defined term but should not be capitalized e drafting team revisions were limited to alignment of the <i>existing</i> definitions, and sting definitions were aligned (and the capitalization issue was present in both the consider all of the capitalization issues identified during Phase 1 and develop ide its recommendations to the Standards Committee (SC) and NERC. It will be the eam recommendations. The drafting team encourages you to attend the next mmendations.
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
43	Kathleen Black – DTE Energy	3,4,5		Yes	
SDT	response:				
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
45	Jared Shakespeare – Peak Reliability	1		Yes	
SDT	response:				
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
SDT	response:				
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	

Project 2015-04 - Alignment of Terms | Consideration of Comments

Term 50: Transmission Operator

August 2015

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#	Commenter	Segment	Group name	Y/N	Comment					
	Organization									
SDT	SDT response:									
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the					
	Duke Energy				definition, as it is currently a defined term.					
SDT	response: Thank you for your	r comments.	The drafting team agree	s that th	ere should be consistency in the use of capitalization throughout the NERC defined					
term	ns. During the Phase 1 work, a	number of c	apitalization issues were	e identifi	ed, including, but not limited to: capitalization of a term that is not a defined term;					
	· · · · · · · · · · · · · · · · · · ·			_	g; and, capitalization of a term that is a defined term but should not be capitalized					
					e drafting team revisions were limited to alignment of the <i>existing</i> definitions, and					
		•	•		ting definitions were aligned (and the capitalization issue was present in both the					
					onsider all of the capitalization issues identified during Phase 1 and develop					
				•	ide its recommendations to the Standards Committee (SC) and NERC. It will be the					
					eam recommendations. The drafting team encourages you to attend the next					
Proj	ect 2015-04 meeting which w	ill focus on d	evelopment of the Phase	e 2 recor	mmendations.					
				T						
49	Andrea Jessup –	1,3,5,6		Yes						
	Bonneville Power									
	Administration									
SDT	response:									

End of Report



Consideration of Comments Term 51: Transmission Owner

Project Name: 2015-04 Alignment of Terms
Comment Period Start Date: 6/13/2015
Comment Period End Date: 7/27/2015

Associated Ballot: Term 51: Transmission Owner

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

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Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 51: Transmission Owner (redline)

Transmission Owner:

The entity that owns and maintains transmission facilities Facilities.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Facilities" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
SDT	<u>response</u> :				
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
SDT	response:				
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
SDT	response:				
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
SDT	response:				
5	John Seelke –	1,2,5,6	PSEG	Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment				
	PSEG								
SDT	SDT response:								
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes					
SDT	response:								
7	Thomas Foltz – AEP	5		Yes					
SDT	response:								
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes					
SDT	response:								
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes					
SDT	response:								
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion recommends that the word 'transmission' should also be capitalized as it too is a defined term in the NERC Glossary.				
SDT	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined								

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



Commenter Organization	Segment	Group name	Y/N	Comment			
Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	No	Suggest to clearly define 'Facilities' to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.			
SDT response: The drafting team recognizes that the definition of "Facilities" could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.							
Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes				
response:							
Andrew Pusztai – American Transmission Company, LLC	1		Yes				
response:							
Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes				
<u>response</u> :							
Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition. We also recommend capitalization of the term "Transmission" within the Transmission Owner (TO) definition because this term is defined in the Glossary and we believe its usage in the TO definition narrative is intended to have the meaning of the defined term.			
	Organization Lee Pedowicz — Northeast Power Coordinating Council response: The drafting team ting language in the Glossary a sions). However, as part of Ph members and various comm tess Manual. Joe O'Brien — NiSource - Northern Indiana Public Service Co. response: Andrew Pusztai — American Transmission Company, LLC response: Matthew Beilfuss — WEC Energy Group, Inc. response: Dennis Chastain — Tennessee Valley Authority	Organization Lee Pedowicz — 10 Northeast Power Coordinating Council response: The drafting team recognizes the ting language in the Glossary and ROP definesions). However, as part of Phase 2 for this members and various commenters. The states Manual. Joe O'Brien — 6 NiSource - Northern Indiana Public Service Co. response: Andrew Pusztai — 1 American Transmission Company, LLC response: Matthew Beilfuss — 3,4,5,6 WEC Energy Group, Inc. response: Dennis Chastain — 1,3,5,6 Tennessee Valley Authority	Lee Pedowicz -	Organization Lee Pedowicz — 10 NPCCProject 2015- No Northeast Power Coordinating Council response: The drafting team recognizes that the definition of "Facilities" of ting language in the Glossary and ROP definitions, the drafting team did no sions). However, as part of Phase 2 for this project, the drafting team will do no members and various commenters. The SAR will be submitted to the Statess Manual. Joe O'Brien — 6 Yes NiSource - Northern Indiana Public Service Co. response: Andrew Pusztai — 1 Yes American Transmission Company, LLC response: Matthew Beilfuss — 3,4,5,6 Yes WEC Energy Group, Inc. response: Dennis Chastain — 1,3,5,6 Yes			

terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and

Project 2015-04 - Alignment of Terms | Consideration of Comments Term 51: Transmission Owner

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#	Commenter	Segment	Group name	Y/N	Comment				
	Organization								
ROP reco deci	therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.								
16	Jared Shakespeare – Peak Reliability	1		Yes	Is there ever a difference between the entity that owns it and the entity that maintains it? Perhaps there could be some discrepancy between the two.				
dele	SDT response: The drafting team believes that the owner has responsibility for both ownership and maintenance, however, in practice, maintenance may be delegated to another entity. To the extent you believe clarification is needed, the drafting team suggests submitting a SAR outlining the issues and your proposed recommendations for resolving those issues.								
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.				
SDT	response: Please see the dra	fting team res	sponse to comments su	bmitted	by the Southwest Power Pool.				
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to				
					create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if				



#	Commenter Organization	Segment	Group name	Y/N	Comment
					NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.
					While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
SDT	response: Please see the dra	fting team res	sponse to your comment	t for Ter	m 4: Blackstart Resource.
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
SDT	response:				
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
SDT	response:				
21	Lee Schuster – Duke Energy	3		Yes	
SDT	response:				
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		No	Suggest to clearly define 'Facilities' to prevent the confusion from TO versus GO. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.
SDT		recognizes th	at the definition of "Faci	ilities" c	ould be improved. Because the SAR limits this drafting team to alignment of the

<u>SDT response</u>: The drafting team recognizes that the definition of "Facilities" could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.



		ı		1					
#	Commenter Organization	Segment	Group name	Y/N	Comment				
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.				
SDT	response: Thank you for your	r comments;	however, modifications	to the Fu	unctional Model fall outside the permissible scope of the work for this project. As				
outl	ined in the SAR, the drafting t	eam revision	s were limited to alignm	ent of th	ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of				
Mod asso inco	this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.								
24	Heather Morgan –	5		Yes					
	EDP Renewables North								
	America LLC								
SDT	<u>response</u> :								
25	Shawna Speer – Colorado Springs Utilities	1		Yes					
SDT	<u>response</u> :								
26	Linda Jacobson-Quinn –	3		Yes					
	City of Farmington								
SDT	response:								
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes					
SDT	SDT response:								
28	Yvonne McMackin – Public Utility District No.	4		Yes					
	2 of Grant County,								
	Washington								



		T I						
#	Commenter	Segment	Group name	Y/N	Comment			
	Organization							
SDT	<u>response</u> :							
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes				
SDT	<u>response</u> :							
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes				
SDT	<u>response</u> :							
31	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)". Note that this inconsistency extends to multiple Glossary of Terms definitions that			
term term reco reco	SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.							
32	Andrew Gallo – Austin Energy	6		Yes				
SDT	response:	,						
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes				

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13



#	Commenter Organization	Segment	Group name	Y/N	Comment				
SDT	SDT response:								
34	Yuguang Xiao – Manitoba Hydro	5		No					
SDT	SDT response:								
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes					
SDT	response:								
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	See comments from NPCCProject 2015-04.				
SDT	response:								
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes					
SDT	response:								
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	Agree with the capitalization change. However please review comment on the definition for Reactive Power. The term "transmission facilities" is used in that definition and Facilities should be capitalized there as well. It seems the proposed changes between this definition and Reactive Power are using different logic to determine whether Facilities should be capitalized. ere should be consistency in form, sentence structure and capitalization throughout				

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment				
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec	1, 5		No	Suggest to clearly define 'Facilities' to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in				
	Production				Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.				
exist revis tean	<u>SDT response</u> : The drafting team recognizes that the definition of "Facilities" could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.								
40	Robert A. Schaffeld – Southern Company -	1		Yes					
	Southern Company Services, Inc.								
SDT	<u>response</u> :								
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	"Transmission" is a defined term and the drafting team should consider if it should be capitalized.				
SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.									
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes					
SDT	response:								



ш	6	Commont	6	V/NI	C
#	Commenter	Segment	Group name	Y/N	Comment
	Organization				
43	Kathleen Black –	3,4,5		Yes	
	DTE Energy				
SDT	response:				
44	Jennifer Losacco –	1		Yes	
	NextEra Energy - Florida				
	Power and Light Co.				
SDT	response:				
45	Jared Shakespeare –	1		Yes	Is there ever a difference between the entity that owns it and the entity that
	Peak Reliability				maintains it? Perhaps there could be some discrepancy between the two.
SDT	· · · · · · · · · · · · · · · · · · ·	helieves that	the owner has respons	ihility for	both ownership and maintenance, however, in practice, maintenance may be
_			•	•	he drafting team suggests submitting a SAR outlining the issues and your proposed
	mmendations for resolving the	•	believe clarification is i	iccucu, c	the drafting team suggests submitting a state outlining the issues and your proposed
1600	initiendations for resolving the	1036 133063.			
1.0	Tanu Eddlaman	1 2		Vac	
46	Tony Eddleman –	3		Yes	
	Nebraska Public Power				
	District				
SDT	response:				
47	Bernard Johnson –	5		Yes	
	Oglethorpe Power				
	Corporation				
SDT	response:				
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the
	Duke Energy				definition, as it is currently a defined term.
SDT	<u> </u>	r comments.	The drafting team agree	es that th	ere should be consistency in the use of capitalization throughout the NERC defined

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
decis	sion of the SC and NERC regar	ding how to l	pest proceed with the di	rafting to	eam recommendations. The drafting team encourages you to attend the next		
Proie	ect 2015-04 meeting which w	ill focus on de	evelopment of the Phase	e 2 recor	mmendations.		
- ,	.						
40	Andrea Jacous	1256		Vac			
49	Andrea Jessup –	1,3,5,6		Yes			
	Bonneville Power						
	Administration						
SDT	SDT response:						

End of Report



Consideration of Comments Term 52: Transmission Planner

Project Name: 2015-04 Alignment of Terms **Comment Period Start Date:** 6/13/2015

Comment Period End Date: 7/27/2015

Associated Ballot: Term 52: Transmission Planner

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

* = *			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

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Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

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Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 52: Transmission Planner (redline)

Transmission Planner:

The entity that develops a long-term (generally one year and beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion of the Planning Authority Area area.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term "Area" because it is not a defined term in Glossary or the ROP.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment		
1	John Fontenot – Bryan Texas Utilities	1		Yes			
SDT	SDT response:						
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes			
SDT	SDT response:						
3	Leonard Kula – Independent Electricity System Operator	2		Yes			
SDT	SDT response:						
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes			
SDT	SDT response:						
5	John Seelke –	1,2,5,6	PSEG	Yes			



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization	Segment	Group name	.,	Comment		
	PSEG						
SDT	response:						
6	Amy Casuscelli –	1,3,5,6		Yes			
	Xcel Energy, Inc.						
SDT	SDT response:						
7	Thomas Foltz –	5		Yes			
	AEP						
SDT	response:						
8	Dennis Minton –	1		Yes			
	Florida Keys Electric						
	Cooperative Assoc.						
SDT	<u>response</u> :						
9	Rob Collins –	1, 6, 5, 3		Yes			
	On Behalf of: Scotty						
	Brown, Southern Indiana						
	Gas and Electric Co.						
SDI	<u>response</u> :						
10	Louis Slade –	6	Dominion	Yes			
	Dominion Resources, Inc.		Resources, Inc.				
SDT response:							
11	Lee Pedowicz –	10	NPCCProject 2015-	No	Transmission Systems should be capitalized. Both are defined terms in the NERC		
	Northeast Power		04		Glossary. Transmission System should be uniquely defined. The definitions of		
	Coordinating Council				Transmission and System should not have to be merged by a reader to create the		
					Transmission System definition.		
SDT i	SDT response : Thank you for your comments; however, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP						

cross-over terms. For the term Transmission Planner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider



#	Commenter Organization	Segment	Group name	Y/N	Comment		
reco	recommendations related to sentence structure. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of						
the F	the Phase 2 recommendations. To the extent you believe a new defined term should be created, the team suggests that you submit a SAR.						
12	Joe O'Brien –	6		Yes			
	NiSource - Northern						
	Indiana Public Service Co.						
SDT	response:	<u> </u>					
301	response.						
42	A.d. B.d.						
13	Andrew Pusztai –	1		Yes			
	American Transmission						
	Company, LLC						
SDT	response:						
14	Matthew Beilfuss –	3,4,5,6		Yes			
	WEC Energy Group, Inc.						
SDT	response:			1			
15	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary		
	Tennessee Valley	2,3,3,0			definition.		
	Authority				definition.		
	Authority				We also recommend conitalization of the terms "Adequacy" and "Transmission"		
					We also recommend capitalization of the terms "Adequacy" and "Transmission"		
					within the Transmission Planner (TP) definition because these terms are defined		
					in the Glossary and we believe their usage in the TP definition narrative is		
					intended to have the meaning of the defined terms.		
SDT	SDT response : Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined						

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment	
16	Jared Shakespeare – Peak Reliability	1		Yes		
SDT	response:					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	No	We support the Comments Submitted by the Southwest Power Pool.	
SDT	<u>SDT response</u> : Please see the drafting team response to comments submitted by the Southwest Power Pool.					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them. From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard. A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.	



#	Commenter Organization	Segment	Group name	Y/N	Comment		
SDT	<u>SDT response</u> : Please see the drafting team response to your comment for Term 4: Blackstart Resource.						
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.		
SDI	<u>response</u> :						
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes			
SDT	<u>response</u> :						
21	Lee Schuster – Duke Energy	3		Yes			
SDT	response:						
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes			
SDT	response:						
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model. The SRC notes that the Functional Model references a Transmission Planner area.		
SDT	response: Thank you for your	r comments;	however, modifications	to the Fu	unctional Model fall outside the permissible scope of the work for this project. As		

SDT response: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.



#	Commenter Organization	Segment	Group name	Y/N	Comment
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
SDT	<u>response</u> :				
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities
SDT	response:				
26	Linda Jacobson-Quinn – City of Farmington	3		No	The same confusion and gap as with a Planning Coordinator exists. FEUS recommends a broader discussion on the two functional entities and their roles as the Reliability Standards do not clearly delineate their responsibilities nor do the definitions.
auth shou	orization to revise the definit	ions outside of of Transmissio	f addressing alignmen n Planner (or Planning	t betwee g Coordin	ion to align with the existing definition in the ROP. The drafting team did not have n the existing definition language in the Glossary and ROP. If you believe revisions ator), the drafting team suggests submitting a Standards Authorization Request
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	response:				
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
SDT	response:				
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
SDT	response:						
30	Alex Ybarra –	5		Yes			
	Public Utility District No.						
	2 of Grant County,						
	Washington						
SDT	response:						
	<u> </u>						
31	Mike Smith –	1		Yes			
	Manitoba Hydro						
SDT	response:		L				
32	Andrew Gallo –	6		Yes			
	Austin Energy						
SDT	response:		l.				
33	Rachel Coyne –	10		Yes			
	Texas Reliability Entity,						
	Inc.						
SDT	response:						
	<u> </u>						
34	Yuguang Xiao –	5		Yes			
	Manitoba Hydro						
SDT	response:						
	 _						
35	Chris Scanlon –	1	Exelon Utilities	Yes			
	Exelon						
SDT	response:		<u> </u>				
36	Martin Boisvert –	1		Yes			
-	Hydro-Quebec						
	TransEnergie						
SDT	response:						
<u> </u>	и теоропос.						



#	Commenter Organization	Segment	Group name	Y/N	Comment		
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes			
SDT	response:						
unde Glos defir draf	erstands the issues raised in y sary and ROP cross-over term nition in the ROP. If you belie	our commen ns. For the ter ve revisions s	ts. As outlined in the Sarm Transmission Planne hould be made to impr	AR, the dreer, the dra	The use of the term 'Planning Authority' should be discontinued and replaced with Planning Coordinator to be consistent with the Functional Model. Planning Authority no longer exists as an entity in the Functional Model. See comment on the definition for Planning Authority above. Also, in a future Phase, a SAR and new definition should be created to define Planning Coordinator Area so there is consistency with the terms Balancing Authority Area, Transmission Operator Area, and Reliability Coordinator Area. See previous comments on Planning Authority definition. Planning Coordinator Area is a term used within FAC-013-2 and FAC-014-2 for example but has no definition. We also comment that in Phase 2, the phrase in the current definition "the interconnected bulk electric transmission systems" should be changed to "its portion of the interconnected Bulk-Electric System". Finally, we comment for Phase 2 that the definition could be improved such that the phrase "reliability (adequacy)" is removed and replaced with the defined term "Reliable Operation". This would make it more consistent with other terms in the Glossary and ROP. issible scope of work for this project. However, the drafting team appreciates and afting team revisions were limited to alignment of the <i>existing</i> language of the interconnected issues or proposed revisions to the definition or Reliability		
39	Manon Paquet –	1, 5		Yes			
_	1 T		1				



#	Commenter Organization	Segment	Group name	Y/N	Comment			
	On Behalf of: Roger Dufresne, Hydro-Quebec Production							
SDT	response:							
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes				
SDT	response:							
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	The phrase "interconnected bulk electric transmission systems" should be replaced with either "Bulk Electric System" or "Interconnection."			
iden		ıld be address	sed by a development p		of the Glossary and ROP cross-over terms. To the extent that you believe the issues are drafting team encourages you to submit a SAR outlining the issues and your			
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes				
SDT	response:							
43	Kathleen Black – DTE Energy	3,4,5		Yes				
SDT	response:							
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes				
SDT	response:							
45	Jared Shakespeare –	1		Yes				



#	Commenter	Segment	Group name	Y/N	Comment			
	Organization							
	Peak Reliability							
SDT	response:							
46	Tony Eddleman –	3		Yes				
	Nebraska Public Power							
	District							
SDT	response:		<u> </u>					
47	Bernard Johnson –	5		Yes				
	Oglethorpe Power							
	Corporation							
SDT	response:			l				
<u> </u>	 							
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term "Transmission" throughout the			
	Duke Energy	_,,,,,			definition, as it is currently a defined term.			
SDT		r comments	The drafting team agree	s that th	pere should be consistency in the use of capitalization throughout the NERC defined			
					ed, including, but not limited to: capitalization of a term that is not a defined term;			
			•		g; and, capitalization of a term that is a defined term but should not be capitalized			
	•				e drafting team revisions were limited to alignment of the <i>existing</i> definitions, and			
			—					
		•			sting definitions were aligned (and the capitalization issue was present in both the			
			· · · · · · · · · · · · · · · · · · ·		onsider all of the capitalization issues identified during Phase 1 and develop			
			· · · · · · · · · · · · · · · · · · ·	•	ide its recommendations to the Standards Committee (SC) and NERC. It will be the			
					eam recommendations. The drafting team encourages you to attend the next			
Proj	ect 2015-04 meeting which w	vill focus on d	evelopment of the Phase	e 2 recor	mmendations.			
49	Andrea Jessup –	1,3,5,6		Yes				
	Bonneville Power							
	Administration							
SDT	response:	1						

End of Report



Consideration of Comments Term 54: Transmission Service Provider

Project Name: 2015-04 Alignment of Terms **Comment Period Start Date:** 6/13/2015

Comment Period End Date: 7/27/2015

Associated Ballots: Term 54: Transmission Service Provider

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

<u> </u>			
Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

Term 54: Transmission Service Provider (redline)

Transmission Service Provider:

The entity that administers the transmission tariff and provides Transmission Service to Transmission Customers under applicable <u>transmission-Transmission service-Service</u> agreements.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term "Transmission Service" because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter	Segment	Group name	Y/N	Comment
4	Organization	4		V	
1	John Fontenot –	1		Yes	
	Bryan Texas Utilities				
SDT	response:				
		1	T		
2	Emily Rousseau –	1,2,3,4,5,	MRO-NERC	Yes	
	MRO	6	Standards Review		
			Forum (NSRF)		
SDT	response:				
3	Leonard Kula –	2		Yes	
	Independent Electricity				
	System Operator				
SDT	response:				
4	Mary Claire Yatsko –	1,3,4,5,6		Yes	
	Seminole Electric				
	Cooperative, Inc.				
SDT	response:			1	
<u> </u>					



#	Commenter Organization	Segment	Group name	Y/N	Comment			
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes				
SDT	SDT response:							
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes				
SDT	SDT response:							
7	Thomas Foltz – AEP	5		Yes				
SDT	response:			,				
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes				
SDT	response:							
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes				
SDT	response:							
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes				
SDT	SDT response:							
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCCProject 2015- 04	Yes				
SDT	response:							
12	Joe O'Brien –	6		Yes				



		1					
#	Commenter Organization	Segment	Group name	Y/N	Comment		
	NiSource - Northern						
	Indiana Public Service Co.						
SDT	response:			•			
13	Andrew Pusztai –	1		Yes			
	American Transmission						
	Company, LLC						
SDT	response:						
14	Matthew Beilfuss –	3,4,5,6		Yes			
	WEC Energy Group, Inc.	, , ,					
SDT	response:			1			
15	Dennis Chastain –	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary		
	Tennessee Valley				definition.		
	Authority						
	•				We also recommend capitalization of the term "Transmission" within the		
					Transmission Service Provider (TSP) definition because this term is defined in the		
					Glossary and we believe its usage in the TSP definition narrative is intended to		
					have the meaning of the defined term.		
SDT	response: Thank you for you	r comments.	The drafting team agree	s that th	ere should be consistency in the use of capitalization throughout the NERC defined		
					ed, including, but not limited to: capitalization of a term that is not a defined term;		
					g; and, capitalization of a term that is a defined term but should not be capitalized		
	•			_	e drafting team revisions were limited to alignment of the existing definitions, and		
					sting definitions were aligned (and the capitalization issue was present in both the		
					onsider all of the capitalization issues identified during Phase 1 and develop		
			· · · · · · · · · · · · · · · · · · ·				
	recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next						
	ect 2015-04 meeting which w		•				
110	cet 2013 04 meeting which w	iii iocus oii uc	velopinent of the rhast	2 1 6001	Timenautions.		
16	Jared Shakespeare –	1		Yes			
	Peak Reliability	_					
SDT	response:						
	<u>,</u>						



#	Commenter Organization	Segment	Group name	Y/N	Comment
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
SDT	response: Please see the draft	fting team re	sponse to comments su	ubmitted l	by the Southwest Power Pool.
18 SDT	Terry Bilke – Midcontinent ISO, Inc. response: Please see the draft	2	sponse to your comme		
19	John Allen –	4		Voc	San comments from SDD Standards Poviny Croun
19	Joint Allen –	4		162	see comments from ser standards neview Group.



#	Commenter	Segment	Group name	Y/N	Comment	
	Organization					
	City Utilities of					
	Springfield, Missouri					
SDT	response:					
	- _					
20	Jeremy Voll –	3		Yes		
	Basin Electric Power					
	Cooperative					
SDT	response:	L	L			
21	Lee Schuster –	3		Yes		
	Duke Energy					
SDT	response:	1		1		
						
22	Si Truc Phan –	1		Yes		
	Hydro-Quebec					
	TransEnergie					
SDT	response:			1		
						
23	Christina Bigelow –	2	IRC Standards	Yes		
	Electric Reliability Council		Review Committee			
	of Texas, Inc.					
SDT	response:			•		
24	Heather Morgan –	5		Yes		
	EDP Renewables North					
	America LLC					
SDT	response:					
25	Shawna Speer –	1		Yes		
	Colorado Springs Utilities					
SDT	response:					
26	Linda Jacobson-Quinn –	3		Yes		



#	Commenter Organization	Segment	Group name	Y/N	Comment
	City of Farmington				
SDT	response:				
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
SDT	<u>response</u> :				
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
SDT	response:				
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
SDT	response:				
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
SDT	response:	· · ·			
31	Mike Smith – Manitoba Hydro	1		Yes	
SDT	response:				
32	Andrew Gallo – Austin Energy	6		Yes	
SDT	response:				



#	Commenter Organization	Segment	Group name	Y/N	Comment
33	Rachel Coyne –	10		Yes	
	Texas Reliability Entity,				
	Inc.				
SDT	<u>response</u> :				
34	Yuguang Xiao –	5		Yes	
	Manitoba Hydro				
SDT	<u>response</u> :				
35	Chris Scanlon –	1	Exelon Utilities	Yes	
	Exelon				
SDT	response:	,		1	
36	Martin Boisvert –	1		Yes	
	Hydro-Quebec				
	TransEnergie				
SDT	response:	,			
37	Erika Doot –	5		Yes	
	U.S. Bureau of				
	Reclamation				
SDT	<u>response</u> :				
38	Jason Smith –	2	SPP Standards	Yes	For Phase 2, we suggest reviewing the term 'Agreement' as it is a defined term
	Southwest Power Pool,		Review Group		and its usage appears to also be intended to have the meaning of the defined
	Inc. (RTO)				term.
SDT	response: Thank you for you	ir comments.	The drafting team agre	es that th	nere should be consistency in the use of capitalization throughout the NERC defined

SDT response: Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the



#	Commenter Organization	Segment	Group name	Y/N	Comment
	sion of the SC and NERC rega ect 2015-04 meeting which w				eam recommendations. The drafting team encourages you to attend the next nmendations.
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
SDT	response:				
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<u>SDT</u>	<u>response</u> :				
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	"Transmission" and "Agreement" are defined terms and the drafting team should consider if they should be capitalized.
term failu beca thero ROP reco decis	re to capitalize a defined terr use it does not have the inte efore the team was not at lib and Glossary definition). As p mmendations for how to add	a number of come when the tended meaning erty to address part of Phase dress these issurding how to	apitalization issues wererm has the definitional g of the definition. Howest capitalization issues in 2 of this project, the teamules. The drafting teamules proceed with the design of the teamules.	e identifice meaning tever, the factor the existence of t	here should be consistency in the use of capitalization throughout the NERC defined ed, including, but not limited to: capitalization of a term that is not a defined term; and, capitalization of a term that is a defined term but should not be capitalized drafting team revisions were limited to alignment of the <i>existing</i> definitions, and ting definitions were aligned (and the capitalization issue was present in both the consider all of the capitalization issues identified during Phase 1 and develop ide its recommendations to the Standards Committee (SC) and NERC. It will be the earn recommendations. The drafting team encourages you to attend the next immendations.
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
SDT	response:				
43	Kathleen Black –	3,4,5		Yes	



#	Commenter Organization	Segment	Group name	Y/N	Comment
	DTE Energy				
SDT	response:				
35.	103p01130 .				
44	Jennifer Losacco – NextEra Energy - Florida	1		Yes	
	Power and Light Co.				
SDT	<u>response</u> :				
45	Jared Shakespeare –	1		Yes	
	Peak Reliability				
SDT	<u>response</u> :				
46	Tony Eddleman –	3		Yes	
	Nebraska Public Power				
	District				
SDT	<u>response</u> :				
47	Bernard Johnson –	5		Yes	
	Oglethorpe Power				
	Corporation				
SDT	<u>response</u> :				
48	Colby Bellville –	1,3,5,6	Duke Energy	Yes	
	Duke Energy				
SDT	<u>response</u> :				
49	Andrea Jessup –	1,3,5,6		Yes	
	Bonneville Power				
	Administration				
SDT	<u>response</u> :				

End of Report



Consideration of Comments

Project Name: 2015-04 Alignment of Terms

Comment Period Start Date: 6/13/2015 **Comment Period End Date:** 7/27/2015

Associated Ballots: N/A

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



MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

PSEG

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Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6



Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

NPCC--Project 2015-04

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5



Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2



Ali Miremadi	CAISO	WECC	2	

Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirchak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6



Mohan Sachdeva	Buckeye Power, Inc.	RFC	4	
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Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6



Question

If you have additional comments on the proposed revisions to the Glossary definitions that you have not provided in your responses above, please provide them here.

#	Commenter Organization	Segment	Group name	Y/N	Comment
3	Leonard Kula – Independent Electricity System Operator	2			We commented on the SAR to highlight the importance of achieving total consistency across the terms defined in Reliability Standards, RoP and Functional Model, and suggested that the purpose statement, scope of work, goals and detail description of work of this project be expanded to include reviewing terms defined in the Functional Model. We noticed that the proposed changes to the NERC Glossary (and the ROP) do not appear to be fully aligned with the terms defined in the FM. We suggest the drafting team to follow-up on its proposed approach outlined in the response to our comment, that: " The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model."
			116		We once again propose the SDT to make the appropriate changes to the terms defined in the three documents as necessary and appropriate to achieve total consistency. We do not believe changes to the FM are outside of the scope of the project, but where in the SDT's opinion this is the case, we suggest that the SDT amend the SAR to include the terms defined in the FM.
					unctional Model fall outside the permissible scope of the work for this project. As ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of

SDT response: Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

11	Lee Pedowicz –	10	NPCCProject 2015-	[1] Is there a NERC endorsed consistent format for capitalization when you have a
	Northeast Power		04	term that is made up of several words, and is not defined in the NERC Glossary,
	Coordinating Council			but some of the words are defined? For example, in PRC-002-2 Disturbance
				Monitoring and Reporting Requirements, the Standard uses the term dynamic



#	Commenter Organization	Segment	Group name	Y/N	Comment
					Disturbance recording. Only Disturbance is capitalized because it is the only word in the NERC Glossary.
					[2] This Comment Form is asking for input on the alignment of the terms in the NERC Glossary and the RoP. To ensure a comprehensive comparison and review, why aren't all the terms listed in the Proposed Revisions to Appendix 2 of the Rules of Procedure - Project 2015-04 Alignment of Terms included in this Comment Form?
					[3] The term 'Reliable Operation' must be also capitalized in the definition of 'Frequency Response Obligation'; 'Interconnected Operations Service' or archive terms such as 'Frequency Bias Setting' 2005; 'Overlap Regulation Service'.

- [1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.
- [2] Because there are separate and distinct processes for revising definitions in the Glossary and the ROP, the commenting for the Glossary and ROP was conducted separately. The Glossary definition revision process is governed by the Standards Process Manual (see, Section 5). The definition development process, for the most part, mirrors the process for standards development. The ROP revision process is governed by Section 1400 of the ROP, and the ROP revisions are being proposed by the Standards Committee pursuant to those provisions. However, both 45-day comment periods ran simultaneously because the proposed revisions to the Glossary and ROP are inextricably linked.
- [3] As outlined above, the drafting team agrees that there should be consistency in capitalization throughout the NERC defined terms. The drafting team will provide a recommendation regarding capitalization consistency during Phase 2 of this project.



#	Commenter Organization	Segment	Group name	Y/N	Comment
22	Si Truc Phan – Hydro-Quebec TransEnergie	1			On phase II of this project, Suggest to change the term 'Interchange Authority' to 'Interchange Coordinator' to harmonize with Planning Coordinator, Reliability Coordinator, etc.
whi	ch it will develop a SAR. To th	e extent that	you believe the issues i	dentified	not identify "Interchange Authority" or "Interchange Coordinator" as terms for in your comments should be addressed by a development project, the drafting recommendations for resolving those issues.
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee		[1] The SRC respectfully suggests that this project and the proposed additional phases have the potential to result in additional revisions to Reliability Standards through official efforts as well as unintentional consequences to the meaning and/or intent of Reliability Standards. While achieving consistency is an important effort, the maintenance of multiple definitions and the modification of definitions outside of specific, focused drafting processes for particular standards could exacerbate the potential for adverse and unintended consequences. Hence, the SRC would recommend that the SDT re-consider its proposal for additional phases and provide any proposed or recommended revisions for definitions to the SDTs or periodic review teams associated with affected Reliability Standards where impacts are standard-specific. [2] The SRC respectfully suggests that the SDT utilize this effort to define the Glossary of terms Used in Reliability Standards as the primary repository of defined terms for all NERC documents. There are opportunities in other documents to cross-reference the Glossary and such opportunities should be seized to facilitate and maintain consistency on an ongoing basis. As an example, the last paragraph of the General Section of Appendix 2 of the Rules of Procedure provides statements referencing terms having their "commonly understood" and "technical meanings." As the Rules of Procedure already provides for cross-referencing to "define" terms, the SRC respectfully suggests that, to reduce the potential for inconsistent terms on the future, NERC utilize a cross-reference to the NERC Glossary of Terms Used In Reliability Standards and only define those terms that are specific to the Rules of Procedure. This would simplify the Rules Of Procedure, reduce ongoing confusion regarding the differing "glossaries" and facilitate ongoing consistency. To effect this recommendation, the SRC suggests



				1	
#	Commenter Organization	Segment	Group name	Y/N	Comment
					that the paragraph in the General Section beginning "Definitions of terms in this Appendix" be deleted and the following paragraph modified by adding the following sentence at its beginning:
					"Defined Terms utilized in these Rules of Procedure shall have the definition provided in the NERC Glossary of Terms Used In Reliability Standards unless otherwise defined below. Other terms used on the Rules of Procedure"
					[3] To reiterate its comments above, the SRC commented on the SAR to highlight the importance of achieving total consistency across the terms defined in Reliability Standards, Rules of Procedure, and Functional Model, and suggested that the purpose statement, scope of work, goals and detail description of work of this project be expanded to include reviewing terms defined in the Functional Model. As noted, the proposed changes to the NERC Glossary (and the Rules Of Procedure) do not appear to be fully aligned with the terms defined in the Functional Model. The SRC suggests that the drafting team reconsider its proposed approach outlined in the response to our comment, that: " The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and Rules Of Procedure. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model."
					As noted in the White Paper regarding the Proposed Revisions to Align Definitions in the Glossary of Terms and Rules of Procedure, discrete revision processes were a cause of several terms becoming incongruent. To avoid a similar result with the process to revise the Functional Model, it is recommended that the SAR be revised to allow all definitions changes not associated with specific reliability standards to be consolidated into one effort. Thus, the SRC recommends that the SDT make the appropriate changes to the terms defined in the three documents as necessary and appropriate to achieve total consistency.
					[4] Finally, the SDT should ensure that the definitions are consistent when it comes to the use of the terms "Bulk Power System" and "Bulk Electric



#	Commenter Organization	Segment	Group name	Y/N	Comment
					System." If this cannot be done in Phase 1 of the project, then it should be evaluated in the proposed future phases.

- [1] Thank you for your comments. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations.
- [2] The drafting team agrees that in some respects it would be easier to have one document containing all of the NERC defined terms. However, due to the differences in how the two sources are revised and the differences in how the terms are used, the team is not recommending that the two sources are combined. The drafting team notes that the defined terms included in the Glossary and ROP are applicable only with regard to the source in which they are defined (Glossary terms only apply to Reliability Standards, whereas ROP terms only apply to provisions of the ROP). Given that the Reliability Standards and the ROP address very different subject matters and serve different purposes, the definitions are developed and maintained separately. Additionally, the process for revising Glossary terms is substantially different than for revising ROP terms. Glossary terms must be developed (and revised) in the same manner as Reliability Standards by a drafting team and subject to industry ballot and approval (See Section 5 of the Standards Process Manual). On the other hand, revisions to the Rules of Procedure (including the defined terms found in Appendix 2) are undertaken through Section 1400 of the Rules of Procedure. As indicated above, during Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The team will consider the issues raised in your comments during the Phase 2 development stage.
- [3] The drafting team understands your concern; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.
- [4] The drafting team agrees that in the Reliability Standards, Glossary, and ROP there are instances of inconsistent or incorrect usage or application of the terms Bulk Electric System (BES) and Bulk Power System (BPS). Because the SAR limits this drafting team to alignment of the definitions in the Glossary and ROP, the team did not address this issue. However, during Phase 2 of this project, the drafting team will consider a recommendation that an effort is undertaken to assess usage of the BES and BPS throughout the Reliability Standards, Glossary, and ROP for the purpose of ensuring proper usage and application of the various terms given the particular context. The drafting team *highly* encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.



Ŧ	Commenter Organization	Segment	Group name	Y/N	Comment
26	Linda Jacobson-Quinn – City of Farmington	3			The NERC Glossary and Terms and NERC Rules of Procedure fail to align (and in some instances contradict) the NERC Functional Model. In order provide consistency and clarity to the industry, the NERC Functional Model should be reviewed and revised.
this Mod asso inco	project, the drafting team wildel to incorporate the industraction of the comments of the comm	Il make a recon y-approved alig at the direction reliability relate	nmendation to the Sta Inment revisions. Note I of the Standards Con	indards C e that the nmittee (ne existing language of the Glossary and ROP cross-over terms. As part of Phase 2 of Committee that the Functional Model Advisory Group (FMAG) update the Functional Perpose of the FMAG is to maintain the NERC Reliability Functional Model and the SC) to ensure the model correctly reflects the industry today and evaluates and only encourages you to attend the next Project 2015-04 meeting which will focus on
31	Mike Smith – Manitoba Hydro	1			Numerous Glossary of Terms definitions not identified in this project require modification to align with whichever approach is consistently applied for referencing defined terms with suffixes that modify how the defined term appears (ex. "Facility" being referenced as "Facilities" or "Facility(ies)"). Once a
					unified approach is determined, it should be applied to all instances when referencing this defined term, in addition to other defined terms where the suffix modifies how the term appears in the Glossary.
thro capi that tear related be t	bughout the NERC defined term talization of a term that is not is a defined term but should in will develop recommendation ted to the issues identified in	ms. For examplet a defined terrest not be capitalized one to prevent your comment RC regarding ho	e, during the Phase 1 n; failure to capitalize zed because it does no future misalignment of s. The drafting team was to best proceed with	work, a radefined by have the proving the	referencing this defined term, in addition to other defined terms where the suffix modifies how the term appears in the Glossary. nere should be consistency in form, sentence structure and capitalization number of capitalization issues were identified, including, but not limited to: d term when the term has the definitional meaning; and, capitalization of a term ne intended meaning of the definition. As part of Phase 2 of this project, the drafting istencies in NERC defined terms. The drafting team will develop recommendations de its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will commendations. The drafting team highly encourages you to attend the next Project.



#	Commenter Organization	Segment	Group name	Y/N	Comment
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group		[1] We truly commend the drafting team on their efforts associated with this project. However, this review group would like the drafting team to provide more clarity on what Legal Documentation serves as the foundation (carries the most weight) or driving force to the project. We see that the Federal Power Act was mentioned several times in association with the Glossary of Terms and Rules of Procedure (RoP). We feel this clarification will definitely help give the industry a better understanding of how the drafting team developed their recommendations for phase I and phase II of this project. [2] Additionally, we suggest to the drafting team to evaluate the term 'Interpersonal Communication' in COM-001-2. The review group feels that there is an uncertainty on the intent of the phrase 'any medium' within the definition. We would like to see more clarity provided on what this phrase is applicable to. Would this phrase be applicable only to real-time communication? Is it just for audible methods or does visual fit the equation? For example in Requirement R9, there is confusion on what is intended by the phrase 'initiate action to repair or designate a replacement'. Additionally in Requirement R10, our concern would be what would be designated as a 'medium' in this process (when does the time start). We're not sure if this term qualifies for either phase of your project but, we figured that it wouldn't hurt to mention our concern in reference to this particular term.
CDT	response:				

[1] The primary governing authorities are the statutes and implementing regulations of the applicable governmental authorities in each jurisdiction of the ERO, pursuant to which the NERC ROP and Reliability Standards are approved and made effective.

[2] Thank you for your comments; however, the proposed actions are outside of the scope of work for this project. To the extent that you believe the issues with the term "Interpersonal Communication" should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues. Also, the drafting team notes that Project 2015-07 Internal Communications Capabilities is currently an active standards development project. The team suggests attending the Project 2015-07 meeting and voicing your concerns to that team.

39	Manon Paquet –	1, 5		In project 2015-04 many interrogations have been raised. We know that they will
	On Behalf of: Roger			be treated in phase 2 but we want to address them in this section in order to let
	Dufresne, Hydro-Quebec			you know our concerns.
	Production			



#	Commenter Organization	Segment	Group name	Y/N	Comment
					[1] The term "unit" is not define in neither glossary of terms nor rules of procedures.
					[2] In the glossary of terms, page 94, in the NPCC section, the "generating plant" definition could be in conflict with other definitions.

- [1] Thank you for your comments; however, the proposed actions are outside of the scope of work for this project. To the extent that you believe a definition should be developed for the term "unit," the drafting team encourages you to submit a SAR outlining why a definition should be created. The drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.
- [2] Regional definitions were not included as part of the continent-wide project. The regional revision process is conducted separate and apart from the NERC continent-wide development process. To the extent you believe an issue exists with the definition of "generating plant," the drafting team encourages you to bring it to the attention of your regional entity.

41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators -	[1] For each definition that is modified, an evaluation of its use in every requirement should be performed to ensure that the meaning of the requirement
			Terms Project	is not unintentionally modified. This evaluation should be documented for review by industry during the next posting.
				[2] We also recommend that the drafting team develop a white paper or technical reference document to clarify when the drafting team intended to have lowercase defined terms. There are compliance implications with lowercase terms and guidance should clarify the intended meanings of these terms. If the drafting team does not decide to choose this course of action, we recommend that the drafting team consider replacing lowercase Glossary/ROP terms with other language to avoid confusion and ambiguity.

SDT response:

[1] As part of Phase 1 for this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP ("cross-over terms"), and to the extent there were definitional differences, assessed whether alignment revisions should be made. For each of the cross-over terms under consideration, the drafting team undertook substantial background research before determining whether alignment revisions were appropriate, including an examination of the history of the term's definition, previous drafting teams' intent, relevant NERC filings to FERC, and any FERC orders approving the term's definition. Additionally, the SDT examined how each term is used in the Glossary, Reliability Standards, and ROP provisions, and how any proposed revisions will



#	Commenter	Segment	Group name	Y/N	Comment		
	Organization						
"Sur term [2] T of ca the t mea addr Phas issue to be deve	affect the application of the standards or rules. Based on this thorough examination, the SDT determined whether alignment revisions were appropriate. The "Summary of Proposed Revisions to Align Cross-Over Terms" contains a detailed overview of the drafting team research and assessment for each of the cross-over terms under revision. [2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the existing definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.						
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6			BPA supports and appreciates NERC's efforts to bring greater consistency to the governing reliability standards documents.		
SDT	response:						

End of Report