

## Consideration of Comments

### Midwest Reliability Organization (MRO) Regional Reliability Standards Process Manual

The Midwest Reliability Organization (MRO) Regional Reliability Standards Process Manual requesters thank all commenters who submitted comments. The manual was posted for a 45-day industry review and public comment period from August 28, 2012 through October 11, 2012. Stakeholders were asked to provide feedback on the manual through a special electronic comment form. There were 4 sets of comments, including comments from approximately 8 different people from approximately 5 companies representing 4 of the 10 Industry Segments as shown in the table on the following pages.

All submitted comments may be reviewed in their original format on the Regional Standards project page:

[http://www.nerc.com/filez/regional\\_standards/regional\\_reliability\\_standards\\_under\\_development.html](http://www.nerc.com/filez/regional_standards/regional_reliability_standards_under_development.html)

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

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<sup>1</sup> The appeals process is in the Standard Processes Manual: [http://www.nerc.com/files/Appendix\\_3A\\_StandardsProcessesManual\\_20120131.pdf](http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf)

**Index to Questions, Comments, and Responses**

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- 5. Do you agree the revised MRO Regional Reliability Standards Process Manual continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below. .... 9

**The Industry Segments are:**

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

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Mike Garton	Dominion	X		X		X	X				
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
	1. Louis Slade	Dominion Resources Services, Inc.	RFC	5, 6									
	2. Randi Heise	Dominion Resources Services, Inc.	MRO	5, 6									
	3. Connie Lowe	Dominion Resources Services, Inc.	SERC	5, 6									
	4. Michael Crowley	Dominion Virginia Power	SERC	1, 3									
2.	Individual	Nazra Gladu	Manitoba Hydro	X		X		X	X				
3.	Individual	Kevin Lyons	Central Iowa Power Cooperative (CIPCO)	X		X							
4.	Individual	Andrew Z. Pusztai	American Transmission Company	X									

1. Do you agree the revised MRO Regional Reliability Standards Process Manual continues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below.

**Summary Consideration:**

Organization	Yes or No	Question 1 Comment
Central Iowa Power Cooperative (CIPCO)	Yes	Should ALL Standard Development meetings be open to "all interested parties" as stated on Page 7 of the redlined Manual? It seems that security-related standards such as CIP should be limited in some way to prevent sharing of potential industry security vulnerabilities and methodologies that may be discussed by the SDT. This would be particularly true of meetings conducted via teleconference.
<p><b>Response:</b> The Standards Development meetings are open given both NERC and MRO follow ANSI principles to adopt standards. The comment does not dispute that the MRO process is an open process; rather it raises the question as to whether the process should be open, or as open, regarding security-related standards. Confidential information, including confidential information related to security, is covered by MRO’s Policy and Procedure 5 – Confidentiality Policy and applies to the work of the MRO Standards Committee. The MRO SC is not recommending any changes to the manual to address this comment.</p>		
American Transmission Company	Yes	
Dominion	Yes	
Manitoba Hydro	Yes	

2. Do you agree the revised MRO Regional Reliability Standards Process Manual continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

**Summary Consideration:**

Organization	Yes or No	Question 2 Comment
Central Iowa Power Cooperative (CIPCO)	Yes	On Page 9 of the redline version, the description of the SDT was modified to remove references to the size of the SDT ("small" and "(5 to 10 people)" were removed). However, on Page 16, the SDT continues to include "small" as a descriptor. This word should be removed to be consistent with the modified SDT description on Page 9.
<p><b>Response:</b> The MRO SC agrees and has submitted a revised page 9 which is attached. The MRO SC recommends the NERC BOT approve these additional revisions.</p>		
American Transmission Company	Yes	
Dominion	Yes	
Manitoba Hydro	Yes	

**3. Do you agree the revised MRO Regional Reliability Standards Process Manual continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below**

**Summary Consideration:**

Organization	Yes or No	Question 3 Comment
Dominion	Yes	
Manitoba Hydro	Yes	
Central Iowa Power Cooperative (CIPCO)	Yes	
American Transmission Company	Yes	

4. Do you agree the revised MRO Regional Reliability Standards Process Manual continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 4 Comment
Central Iowa Power Cooperative (CIPCO)	Yes	<p>Page 13 of the redline version appears to include two tentative areas of text. The first is "Within [no greater than 60] days..." This should simply say "Within 60 days..." The second is later in the same sentence; "the [standards] committee..." This should read either "the Standards Committee..." or "the SC..."</p> <p>Page 17 of the redline version - the first bullet point: instead of "what functional entity" this should read "which functional entity(ies)" as often a requirement applies to multiple entities.</p> <p>Page 19 of the redline version - the last sentence of the first paragraph would be more clear if it were divided into two sentences. The sentence starting with "Formation of the ballot pool..." should end with "45-day posting." and "Balloting, in accordance with Step 9, will occur during the last 10-days." should be its own sentence.</p> <p>Page 27 of the redline version, Errata - added text in the first paragraph should contain the word "then" instead of "than".</p> <p>Page 35 of the redline version - the description of Planning Coordinator should use the same verb tense as the other listed functions; "assess" should be "assesses".</p> <p>Page 40 of the redline version - Bullet 2 (Risk-based) - would it be more accurate to say "evaluated by measuring" than "measured by evaluating"?</p>

**Response:** The MRO SC agrees, in part. Please see changes at revised pages 13, 17, 19, 27 and 35. attached. The MRO SC recommends the NERC BOT approve these additional revisions. With regard to the sentence on page 40, the sentence reflects the NERC Standards Process Manual which provides: “**Risk-based Requirements** define actions of entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions.” The MRO SC recommends the sentence be approved as originally proposed so that there is consistency between the NERC’s Standards Process Manual and MRO’s Standards Process manual.

Organization	Yes or No	Question 4 Comment
American Transmission Company	Yes	
Dominion	Yes	
Manitoba Hydro	Yes	



5. Do you agree the revised MRO Regional Reliability Standards Process Manual continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 5 Comment
American Transmission Company	Yes	
Dominion	Yes	
Manitoba Hydro	Yes	
Central Iowa Power Cooperative (CIPCO)	No	In the ballot process section, Page 21 of the redline version, added text under 'First Ballot' reads: "In the event of balloting difficultiesthe SC will address and decide accordingly." It is unclear what the SC is deciding upon here. Also, a comma and space need to be inserted between 'difficulties' and 'the.'
<p><b>Response:</b> The MRO SC proposes that the sentence be clarified as follows: “In the event of balloting difficulties <u>with electronic balloting through the RSVP system</u>, the SC will address <u>the issues</u> and decide <u>corrective action</u> accordingly <u>to complete the ballot</u>.” The MRO SC requests that the NERC BOT approve this change.</p>		

END OF REPORT