

Individual or group. (1 Responses)
Name (0 Responses)
Organization (0 Responses)
Group Name (1 Responses)
Lead Contact (1 Responses)
Question 1 (1 Responses)
Question 1 Comments (1 Responses)
Question 2 (1 Responses)
Question 2 Comments (1 Responses)
Question 3 (1 Responses)
Question 3 Comments (1 Responses)
Question 4 (1 Responses)
Question 4 Comments (1 Responses)
Question 5 (1 Responses)
Question 5 Comments (1 Responses)

Group
Dominion
Mike Garton
Yes
Yes
Yes
Yes
Yes
Although all questions are answered in the affirmative, Dominion continues to be concerned that the NPCC Regional Standard Processes Manual is inconsistent with NERC's Rules of Procedure and the NERC Standard Processes Manual. Specifically, as Dominion previously provided comments: 1. Dominion does not agree with the proposed revision replacing "interpretation" with "clarification" as this introduces inconsistency with the NERC Rules of Procedure and fails to attain approval of the Applicable Governmental Authorities. While we appreciate the response to our previous comments and understand that NPCC is working with NERC to overhaul its interpretation process, Dominion believes that NERC should set the standard for the ERO Enterprise via its Rules of Procedure. 2. Dominion does not support the purpose language "Provides a level of Bulk Electric System reliability that is adequate to protect public health, safety, and national security..." as it is overreaching and inconsistent with the ERO's authority established in Section 215. In prior comments, Dominion recommended replacing this language with "Provides an adequate level of reliability for the Bulk Electric System." NPCC's response to Dominion's comments stated the language was taken directly from the National Electricity Reliability Act and was also used in a TRE petition for approval of BAL-001-TRE-01. The National Electricity Reliability Act (i.e. H.R. 312, 107th Congress) died in Committee and the NPCC language should be consistent with ERO authority established in Section 215, regardless of the TRE filing. 3. Dominion does not agree with NPCC's adoption of the meaning of the phrase "physical difference" consistent with FERC's Order, issued September 22, 2004, Granting Request for Clarification regarding Docket No. PLO4-5-000, Policy Statement on Matters Related to Bulk Power System Reliability. The FERC Order pre-dates Subtitle A of the Electricity Modernization Act of 2005 adding Section 215 to the Federal Power Act (16 U.S.C. § 824n). While Dominion appreciates NPCC's response to our prior comments, we continue to believe usage of the phrase "physical difference" should be consistent with the Act, ERO Regulations, and the NERC Rules of Procedure.