

Comment Form — Fuel Supply or Delivery Disruption Reporting SAR

This form is to be used to submit comments on the proposed Fuel Supply or Delivery Disruption Reporting SAR. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to sarcomm@nerc.com with the words "Fuel Disruption Reporting SAR" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE. IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- DO:** **Do** enter text only, with no formatting or styles added.
 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

- DO NOT:** **Do not** insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
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NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities

Background Information:

The Gas/Electricity Interdependencies Task Force (GEITF) Report approved by the NERC Board on June 15, 2004 included the following recommendation: “NERC should establish a monitoring system that tracks fuel infrastructure contingencies that have, or could have, and adverse impact on electric system reliability.” The subject SAR is in response to the GEITF report.

The NERC Generation Availability Data System (GADS) currently has the capability to track fuel supply or delivery disruptions, but reporting by generators is voluntary and not necessarily complete. The NERC Resource Issues Subcommittee (RIS) investigated the possibility of using GADS or creating a new database. The RIS concluded that the creation of a new database is unnecessary given that GADS can cover the reporting of fuel delivery or supply issues and is suggesting GADS be used as the reporting tool to support this proposal.

The SAR contemplates a standard that would require the confidential reporting, through the GADS reporting system, fuel supply or delivery disruptions of fuel that alter the operating status or the actual capability of a plant. This reporting requirement would be applicable to any type of fuel source.

The requester would like to receive industry comments on this SAR to help in determining the need for and the scope of any resulting standard. Accordingly, we request your comments included on this form, e-mailed to sarcomm@nerc.com with the subject “Fuel Disruption Reporting SAR” by **February 15, 2006**.

1. Do you believe there is a reliability need for the reporting and collection of fuel supply or delivery disruptions?

If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope and applicability of the proposed SAR?

If not, please explain in the comment area.

Yes

No

Comments: (i) The proposed standard requires reporting of all "qualifying events" irrespective of fuel type. This is too wide a scope, and there may be difficulties in tracking disruption to fuel type such as nuclear.

(ii) The possible use and potential users of this information is excluded, and there is no mention of who the report should go to. Additionally, currently no requirements exist for generation owners to report generator unavailability. To require reporting of fuel supply or delivery disruptions via GADS could preclude (a) the use of any other data base, and (b) the Reliability Authority and other reliability functional entities getting first hand information to factor the information into its operational plans.

(iii) Generation owners or operators may not always be aware of the disruption until it begins to materially impact fuel supply to the generator. Consideration should be given to having a requirement for generation owners to establish agreements with their fuel suppliers to ensure that notification is made in the early stage of the disruption event.

3. Are you aware of any limitations that could preclude using the current GADS reporting system as a basis for fuel supply or delivery disruption reporting?

If yes, please explain in the comment area.

Yes

No

Comments: None. However, for reason provided above, the use of GADS is but one option and should not be a presumption in preparing the standard.

- 4. Are you aware of any commercial considerations that might require a concurrent NAESB action associated with the proposed SAR?**

If yes, please explain in the comment area.

Yes

No

Comments:

- 5. Are you aware of any regional differences that should be included during the development of a standard as set forth in the SAR?**

If yes, please explain in the comment area.

Yes

No

Comments:

- 6. Do you have any additional comments on the proposed SAR you wish to be considered?**

If yes, please elaborate in the comment area.

Yes

No

Comments: Reporting fuel supply or delivery disruptions is highly commercially sensitive. Generation owners may be reluctant to comply unless such information is absolutely necessary for ensuring supply reliability in the reliability authority area the generator resides, and the owner is required by legislation or market rule to supply this information (to the market/system operator or regulator). This needs to be taken into consideration when developing the standard in order to gain acceptance by generation owners. A standard that is built on top of existing requirements for reporting generation unavailability in established markets or regional practices should be considered. Whether or not and how the reported information should be compiled will need to be assessed on the value and potential use of the data base, while the use of GADS should only be a secondary consideration.