

Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

- **There is a lack of clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. We are of opinion that such measures and compliance related items should also be simultaneously addressed in these standards, especially where these exist already. Such items have been identified in our completed NERC Questionnaire below.**
- **Several standards as they are presently written have not addressed the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria.**
- **In some instances, there is a lack of identification of measures during this translation as well as the application of measures is not clear.**
- **Any implementation of the Phase III and IV standards should go through a pilot program and implementation period before formal compliance assessments are completed.**
- **With regards to planning standards, we believe that the Requirements should refer to the "S" 's and not the writing of the measurements of the existing Planning Standards. For example, in Standard 051, the focus is shifted from (as labelled in S1) "The interconnected transmission systems shall..." to (as label in R1-1) "Assessments Requirements". So the Standard is on "assessing that the system meet Table 1 contingencies" and not the "System shall be planned to meet Table 1 contingencies". In the existing standard, assessment is a measure of compliance and that should be the same in the translation. Therefore, the R's in Version-0 should refer to the S's and the Measures should refer to the M's from the existing Planning Standards. So there should be as many R in Version-0 as there were S in the existing Planning Standards and as many measures in the new Version as there were in existing Planning Standards. So a new translation table should be**

provided in the 2nd draft of Version-0. [Also refer to related comments in Question 2 and in Question 14 (at end of this submission)].

- **Several issues are identified and appropriate suggestions/qualifications are presented in order to facilitate NERC SDT to make the corresponding improvements. Please see specific details and comments as provided below including those under Q13 and Q14.**

Question 2:

Are there any “show stoppers” in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

- **Overall the IMO supports the NERC Version 0 Reliability Standards and the efforts of NERC SDT involved in it. However, we have outlined our concerns/issues with appropriate suggestions (via this submission) to facilitate NERC SDT to make improvements in draft 2 of version 0.**
- **During this translation of planning standards, the removal of existing S's have weakened the version 0 planning standards. The "S" language needs to be introduced in version 0 for both clarity and strengthening of the requirements of the version 0 standards. [Also see related comments in Q1 and Q14]**
- **Inclusion of the Phase III and Phase IV Planning Standards would be of great concern in especially in the absence of field testing and required changes.**

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

- **Comments: Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions.**
- **The "S" language needs to be introduced in version 0 for both clarity and strengthening of the requirements of the version 0 standards.**

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

Make improvements to reduce redundancies and better group the requirements.

Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

There is a duplication or redundancy of requirements in certain items of policy 5 and 9. There is a need for improvement to reduce or remove these redundancies and better group the requirements.

A few standards that show duplications are identified below as examples:

- (i) Standard 033 Requirement 8 and Standard 018 Requirement 3**
- (ii) Standard 034 Requirement 1 and Standard 019 Requirement 1**

Where there are obvious inconsistencies, they should be resolved and redundancy removed.

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

- **However, further changes to the Functional Model are needed to sort out accountabilities between the Transmission Operator & the Transmission Owner.**

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

We believe that there should be clear delineation between Business Practices and Reliability standards. We tentatively agree to the potential business practice standards with the understanding that these are not separated from NERC version 0 standards and agree with following condition/comment re: bulleted item # 2 as follows: “For purposes of Reliability, the RA shall have the ability to intervene for inadvertent energy payback, where applicable”. We strongly encourage a carefully coordinated and timed implementation to avoid conflicts and duplication. The Version 0 Reliability Standards must accomplish the fundamental reliability requirements. Further review and comment on the revised standards in anticipation of implementation of Version 1 Reliability Standards would be appropriate.

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments **We agree that the RA is the highest authority and must have ultimate accountability. Splitting and delegating tasks among different organizations must be carefully coordinated so as not to pose any risks to reliability.**

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

We believe that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented. These may be resubmitted through the new standards process, if required.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

We believe that although these standards may be worthwhile going forward they need to be field tested reviewed and revised if necessary before they are implemented. These may be resubmitted through the new standards process, if required.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
001		-R3 -M1 -M2 -Compliance Monitoring Process -Levels of Non-Comp.	A new terminology “CPM1 & CPM2” is being used that is more related to “Standard under development: Standard 300”. The use of this terminology needs to be clarified or corrected.
004			Proposed Version 0 does not appear to include information from the existing Policy 1D, Standard 2, Requirements 1, 2, 3, 1.1, 1.2, 5, 5.1, 6 & 7. These requirements need to be included.
005		-Compliance Monitoring Process -Measures -Levels of Non-Compliance	- No information imported from existing document Policy 1E Requirement 2 4.8.3.3 & 4.8.3.4. - These are missing and needs to be added in Standard simultaneously.
006		-R1	006 does not appear to import any information from the corresponding existing document Policy 1F Requirements 5, 5.1, 5.1.1, 5.1.1.1, 5.1.1.2 and 5.1.2. These requirements need to be included.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
007		-R3	<p>In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL.</p>
008		<p>-Measures</p> <p>Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>In 3rd paragraph, ‘Control Area Operator’ should be replaced with ‘Balancing Authority’.</p> <p>This section is inconsistent with reporting of SOL and IROL violations to the RRO. The term RRO should be used consistently.</p> <p>In 3rd paragraph, ‘RELIABILITY COORDINATOR’ should be replaced with ‘Reliability Authority’.</p>
009		<p>-Measures</p> <p>-Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously</p>
011		-R2	<p>A new task “Connectivity of adjacent Transmission Service Providers” is added for verification and assessment by the Transmission Service Providers in order to approve or deny an Interchange Transaction.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
011		<p>-R2</p> <p>-R2</p>	<p>The 4th bullet should be amended to read "all interchange transactions" not "multiple interchange transactions".</p> <p>The 5th bullet is not included in existing policy - it makes sense to include it however it is a new requirement.</p>
013		<p>-R4</p> <p>-R5</p>	<p>- This requirement includes the existing PSE responsibility for updating tags associated with dynamic schedules where they deviate by more than 25%. The drafting team is asking for acceptance of new criteria however a question is still raised whether for transactions >100MW the requirement is 10% or 25%. Which of this is required or appropriate.</p> <p>- The reference should be Policy 3D, Requirement 2.5.</p>
014		<p>R3</p> <p>-Measures</p> <p>-Compliance Monitoring Process</p> <p>-Levels of Non Compliance</p>	<p>Change "to operating personnel" to "to its operating personnel."</p> <p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously.</p>
015		Applicability	Add Generator Owners and Load Serving Entities. Extend R5 to include these Functional Model entities.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
020		-Attachment 1-	Under (1.) 'RELIABILITY COORDINATOR' should be replaced with 'Reliability Authority'.
023		R1	Change "operating personnel" to "its operating personnel."
025		<p>R5</p> <p>R7</p> <p>-R1</p> <p>Measures: -Compliance Monitoring Process - Levels of Non Compliance</p>	<p>Remove 1, 2, 3, 7, 8 and 9. We recommend that the fuel related guides are not considered for translation into requirements.</p> <p>Does the term "as applicable" allow the Functional Model entities to choose which bullets apply to them?</p> <p>Associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing and needs to be defined in this standard simultaneously. Existing P6T1 outlines the levels of non-compliance.</p>
025		Potential additional elements of requirements R5	<p>Potential additional elements of Requirement R5: We are of the opinion that at a minimum, critical existing requirements from "noted potential additional elements" should be made a part of Requirement R5, although they may included as guides in Policy 6B. Existing Template P6T1 outlines most of these requirements as mandatory.</p>

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
027		R4	We are concerned that elements of Policy 5, Section E have not been sufficiently addressed in this translation.
028		Levels of Non Compliance	The Compliance Monitoring requirements appear to be related to System Restoration as opposed to Control Center Recovery requirements. We would like the Drafting Team to review this section.
030		Measure & Level of non-compliance: Measures	Existing template outlines a clause related to "Interview Verification" requirements. Moreover, non-compliance level 4 in existing template P8T1 refers to the following: ".or the interview verification items 1 and 2 do not support the authority of the Reliability Authority....". Such interview related items referred to in the existing P8T1 should be translated in the new language measures and in level 4 non-compliance for completeness/correctness.
030		M-1	Additionally, in element #1 of the M1 measures, the use of the term "operating position" and "position" cause ambiguity/confusion, whereby the notion of a System Operator and System Personnel are clearly delineated in the old version of P8T1.
031		-R1	R1 may also need to include corresponding existing document Policy 8B's Requirements 1.5, 1.6 and 1.7. Attachment 1 referred to in this Requirement, bullet 5 does not exist in the materials.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
032		R1.2	<p>“Positions that are directly responsible for complying with NERC.” Should be changed to;</p> <p>“Operating Personnel in positions that are directly responsible for complying with NERC.”</p> <p>It should be consistent with the existing template P8T2</p>
033 & 018		R8 & R3	<p>There is duplication or redundancy of requirements between policy 5 and 9. Standard 033 Requirement 8 and Standard 018 Requirement 3 appear to be the same.</p>
034		R1	<p>This should also be addressed in std 029.</p>
007, 017, 018, 019, 021, 022, 023, 024		<p>Measures: Compliance Monitoring Process, -Levels of Non Compliance</p>	<p>Note that the associated Measure, Compliance Monitoring Process and Levels of Non Compliance are missing from the above noted standards. We suggest that these standards should be reassessed in near future to determine the requirements for their associated measures and levels of non-compliance. Accordingly, these should then be specified where applicable.</p>

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

Comments on Planning Standards:

1) std 056 Section 1 -R1-1, second sentence:

“The Regional Reliability Council’s Transmission ...” shall be read instead of “The Region’s Transmission ...” to be consistent with the Standard

2) std 056 Section 1 -R1-1, item 5:

“... for the Regional Reliability Council to grant ...” shall be read instead of “... for the Region to grant ...” to be consistent with the Standard

3) std 056 Section 1 -Level of Non Compliance: Level 4

“Or the Regional Reliability Council...” shall be read instead of “Or the Region...” to be consistent with the Standard

4) std 056 Section 2 -Compliance Monitoring Process:

“Each Regional Reliability Council...” shall be read instead of “Each Region...” to be consistent with the Standard

5) std 058 Section 6 -R6-1:

- “Standard 058-R5-1” shall be read instead of “Standard II.A.M5”.

- On the last paragraph “... provided to the Regional Reliability Councils and NERC...” shall be read instead of “... provided to the Regions and NERC..” to be consistent with the Standard.

6) std 059 Section 1 -Level of Non Compliance: Level 2

“... of Regional Reliability Council procedures ...” shall be read instead of “... of Regional procedure ...” to be consistent with the Standard.

7) std 059 Section 2 -R2-1, fifth paragraph:

“... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.

8) std 059 Section 3 -R3-1, sixth paragraph:

“... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.

9) std 059 Section 4 -R4-1, first & second paragraph:

- “... provide the Regional Reliability Councils with ...” shall be read instead of “... provide the Regions with ...” to be consistent with the Standard.

- “... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.

10) std 059 Section 5 -R5-1, second paragraph:

“... requested by the Regional Reliability Council shall ...” shall be read instead of “... requested by the Region shall ...” to be consistent with the Standard.

11) std 061 Standard Applicability:

- This standard is applicable to the Regional Reliability Councils which are not defined in the NERC’s Functional Model.

- “Section 1, 2, 3, 4, 5, ,6, 7 & 8” shall be read instead of “II.D.M1, II.D.M2, II.D.M3, II.D.M4, II.D.M6, II.D.M10, II.D.M11 & II.D.M12”.

12) std 061 Section 1 -Level of Non Compliance: Level 1 & 4:

“The Regional Reliability Council and the ...” shall be read instead of “The Region and the ...” to be consistent with the Standard.

13) std 061 Section 2 -R2-2:

“... to the Regional Reliability Councils and NERC.” shall be read instead of “... to the Regions and NERC.” to be consistent with the Standard

14) std 061 Section 3 - Requirements: Measures: Level of Non Compliance:

There is no translation of Version 0 Standard attempted for this section. Is this intentional?

15) std 061 Section 4 -R4-1:

“...to NERC, the Regional Reliability Councils, and ...” shall be read instead of “...to NERC, the Regions, and ...” to be consistent with the Standard.

16) std 061 Section 4 -Level of Non Compliance: Level 1, 2, 3 & 4:

“... required by the Regional Reliability Council to report ...” shall be read instead of “... required by the Region to report ...” to be consistent with the Standard.

17) std 061 Section 5 -Level of Non Compliance: Level 1 & 2:

“... on items 1. or 2. was not ...” shall be read instead of “... on items a) or b) was not ...” to be consistent with the Standard.

18) std 061 Section 6 -R6-1:

“...to NERC, the Regional Reliability Councils, and ...” shall be read instead of “...to NERC, the Regions, and ...” to be consistent with the Standard.

19) std 061 Section 7 - Title, Level of Non Compliance: Level 1 & 4:

“... data to Transmission Operator and Reliability Authority.” shall be read instead of “... data to system operators and security center coordinators.” to be consistent with NERC’s Functional Model.

20) std 062 Standard Applicability:

This standard is applicable to the Regional Reliability Councils which are not defined in the NERC’s Functional Model.

21) std 062 Section 2 - Applicability, R2-1:

Why are Western and ERCOT Interconnections excluded?

22) std 062 Section 2 Level of Non Compliance: Level 3

“... demand characteristics were not provided on schedule ...” shall be read instead of “... demand characteristics were provided on schedule ...” .

23) std 063 Sections 1 to 3:

It is suggested that revised section on "Applicability" should include the term "Facility" eg transmission "facility" owner to capture the CWC and LDC facilities this applies to.

24) std 064 Section 1 -Requirements (M1-4):

Need to clarify whether 30 days or 30 business days.

25) std 066 Section - Purpose:

The terminology of "Region" should be replaced with "Regional Reliability Council" to be consistent with terminology mapping followed in other such related version 0 standards.

26) std 067 Section 1 -Requirements (R1-2, R1-3):

-Compliance Monitoring Process:

Need to clarify whether 30 days or 30 business days.

27) std 067 Section 2 -Requirements (R2-2):

Need to clarify whether 30 days or 30 business days.

28) std 067 Section 2 -Measure:

No measures specified.

29) std 067 Section 2 -Compliance Monitoring Process:

Need to clarify whether 30 days or 30 business days.

30) std 067 Section 3 -Requirements (R3-2): Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

31) std 067 Section 4 -Requirements (R4-2):Compliance Monitoring Process:

Need to clarify whether 90 days refers to 90 business days.

32) std 070 Section 1 -Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

33) std 070 Section 4 -Compliance Monitoring Process:

Need to clarify whether 30 days refers to 30 business days.

34) std 072 Section 1 -R1-2:

The standard 072 mentions that vegetation related outages to be reported to "Regional Reliability Council". We are of the opinion that the Transmission Owner should report the vegetation related outages to its concerned "Reliability Authority" in order to be consistent with all present practices and process. Accordingly, we suggest the same to be incorporated in the applicable section 1 of standard 072 as follows: "... to its Reliability Authority all vegetation-related outages ..." shall be read instead of "... to its Regional Reliability Council all vegetation-related outages ...".

35) std 072 Section 1 -Compliance Monitoring Process, Periodic Reporting, Compliance Monitoring Responsibilities:

"... Regional Reliability Council shall report ..." shall be read instead of "The Region shall report ..." to be consistent with the Standard.

OTHER COMMENTS

We suggest that with regards to Version 0 standards, an updated glossary of terms and definitions should be developed and made available to the industry.

We suggest that in version 0 standard, a reference to the associated NAESB BPS should also be provided, as and where applicable (especially in standards related to Policy 3).

In the existing policy the overall role of monitoring of SOL or IROL was assigned to a Control Area. In the applicable version 0 standards a clarification on the role and relationship between Reliability Authority and Transmission Operator should be made with regards to the monitoring of SOL & IROL. standard 7, R-3

Overall we support the NERC Version 0 Reliability Standards and the efforts of NERC-SDT involved in it.

**** Table I: Comments related to either missing or inconsistent references.**

Please note that the comments in Table I below are based on the original posting of Ver 0 Operating Standards-matrix. A few of the concerns mentioned below may have already been addressed/corrected in later published reference document (re: operating policy mark-ups). This information is provided to facilitate NERC SDT for its purposes.

008			Reference to Template P2T2 is missing.
009		-R8	In 2nd paragraph, Policy 2B Requirement 4.2 should be Policy 2B Requirement 3.2. R8 is covered by Policy 2B Requirement 4.

012		<p>-R1</p> <p>-R2</p> <p>-R3</p>	<p>The reference for the last bullet should be Policy 3B, Requirement 4.1.3 instead of Policy 3C, Requirement 3.4.</p> <p>The reference should be Policy 3B, Requirement 1 instead of Policy 3B, Requirement 4.1.3.</p> <p>The reference should be Policy 3A, Requirement 6 instead of Requirement 1</p>
013		R5	<p>- The reference should be Policy 3D, Requirement 2.5.</p>
017		-R6	<p>Policy 4D Requirement 5.1 does not exist. R6 is covered by Policy 4D Requirement 6.</p>
025		R1	<p>Reference to Policy 6B Requirement 1 is missing.</p>
032		-R1	<p>R1's existing document references have been given as Policy 8C Requirements 1, 1.1 and 1.2 whereas these requirements do NOT exist in the original Policy 8C. In fact, the Version 0 standard 032 Requirement R1 has been derived from Policy 8C Standard 1.</p>
019	-R1	Reference to Policy 5B Requirement 1 is missing.	

	-R2	Reference to Policy 5B Requirement 2 is missing.
	-R4	Reference to Policy 5B Requirement 2.2 is missing.
020	-R3	Reference to Policy 5C is missing.
	-R4	Reference to Policy 5C Requirement 1 is missing.
	-R5	Reference to Policy 5C Requirement 2.1 is missing.
	-Levels of Non Compliance	Reference to Template P5T1 is missing.
021	-R1	Reference to Policy 5D Requirement 1 is missing.
	-R2	Reference to Policy 5D Requirement 2 is missing.
	-R3	References to Policy 5D Requirement 3 and Requirement 4 are missing.
	-R4	Reference to Policy 5D Requirement 5 is missing.
022	-R1	Reference to Policy 5F Requirement 1 is missing.
	-R2	Reference to Policy 5F Requirement 2 is missing.
	-R3	References to Policy 5F Requirement 3, Requirement 3.1, Requirement 3.2 and Requirement 3.3 are missing.
	-R4	Reference to Policy 5F Requirement 6 is missing.
	-R5	Reference to Policy 5F Requirement 7 is missing.
023	-R1	Reference to Policy 5G Requirement 1 is missing.
	-R2	Reference to Policy 5G Requirement 2 is missing.
	-R3	Reference to Policy 5G Requirement 3 is missing.
028	-Standard 028	Reference to Template P6T3 is missing
	-R1	Reference to Template P6T3 is missing belonging to bulleted items 1-7.

029	-R4	R4 (which talks about the language of communication used) refers Policy 7B Requirement 2 as its corresponding existing document. Whereas, the Policy 7B Requirement discusses a different topic, Inter Regional Security Network.
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