

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- 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.
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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"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

Agree.

Disagree.

Comments

The IMO appreciates the efforts of the Standards Drafting Team for their work in the development of draft 2 of Version Zero within the stipulated short time period. While we agree with SDT question, never-the-less, we must submit that having two entities with a reliability designation with overlapping roles and authorities is not acceptable in any of the standards of version 0 as it introduces significant confusion and jeopardizes the reliability of the Interconnection(s).

It is the IMO's position that:

- (1) The Version Zero Reliability Standards should identify only one functional entity with a "Reliability" designation.**
- (2) The functional entity designated with "Reliability" must be the entity with the highest level of authority that will act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection**
- (3) The Version Zero Reliability Standards should retain the current designation of Reliability Coordinator in recognition of industry concerns over the application of the term Reliability Authority to this functional entity at this time.**
- (4) The existing "Reliability Co-ordinators" as designated by the Regions in their respective Reliability Plans should be registered as the Version Zero Reliability Coordinators.**

(Refer to the IMO's position paper and rationales on the above matter)

Keeping designations of both "RA" and "RC" (as presently mentioned in draft-2 ver 0) would make the implementation and enforcement of these standards confusing and unnecessarily complicated. The evidences from these standards demonstrate that retention of both RA and RC would create more complexity and confusion in performing various operational tasks outlined in these standards. Moreover, in few cases, the complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays and confusion in performing various functions, thereby impacting reliability. Refer to more examples outlined in our comments in Q13.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

- Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.
- Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above the RA terminology should be replaced with RC or TO as applicable. The RC role should continue in the interim along with the TO.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than $\pm 25\%$.

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than $\pm 10\%$.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ± 25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

Alternative A – translate existing policy and correct any deficiency in a future version.

Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is preferred approach and its application shall result in positive impacts on reliability. However this process should not impede going forward.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that “shall be considered”. Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with “shall be considered” requirements?

- Agree with including these guides as an attachment to the standard.
- Disagree with including these guides in Version 0.

Comments

We feel that including these guides on a "shall be considered" basis would be outside of the scope of the Version 0 process. Version 0 Operating Policies are to be simply a direct translation of existing policies, without the addition of new requirements We support retaining these as “guides,” for the present, and recommend consideration of their ultimate incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these ‘incomplete’ Phase III and Phase IV planning standards would be ‘show stoppers’ that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the ‘incomplete’ Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the ‘incomplete’ Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SARs** separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

Agree with dropping these planning standards from Version 0.

Do not agree with dropping these planning standards from Version 0.

Comments

Based on our previous comments, we agree with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Such standards that have not gone through the entire field testing –revision process should be subject to the full “ANSI approved” NERC Reliability Standards Development Process. Any of the revised standards (based on blackout recommendations) should be developed via urgent action .

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

- 054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies
- 054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results
- 054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

Yes. No.

Comments

With regards to Standard 54, all the references to ATC should be removed and referred to NAESB. However, references to TTC should be retained in the NERC Version 0 standards since TTC impacts reliability.

Standard 055 includes the following sections:

- 055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
- 055.2 Procedure for Verifying Capacity Benefit Margin Values
- 055.3 Procedures for the Use of Capacity Benefit Margin Values
- 055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

Yes. No.

Comments

There is a debate in the industry whether CBM is a commercial or a reliability issue. Some feel that CBM is to be used as a planning reserve margin. This issue needs to be resolved.

Standard 056 includes the following sections:

- 056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
- 056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

Yes. No.

Comments

We strongly believe that Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

Yes.

No.

Comments

It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings). Any Distribution Provider related tasks pertaining to this standard can be captured within Transmission Owner tasks.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING**Question 8: Glossary of Terms**

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
BES Definition	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input type="checkbox"/> Modify	The definition of BES as posted in Glossary is too broad based and requires modification. See our comments in Q 12.
Reliability Coordinator	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input checked="" type="checkbox"/> Modify	Definition of RC should be identical to the definition prescribed in Policy 9.
RA Area	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input type="checkbox"/> Modify	This term should be modified to reflect the RC area
	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input type="checkbox"/> Modify	
	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input type="checkbox"/> Modify	
	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input type="checkbox"/> Modify	
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	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input type="checkbox"/> Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

- Agree with changing to new numbering scheme prior to balloting Version 0 standards.
- Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

We feel that changing to new number scheme at this stage would create confusion and therefore, believe that the proposed numbering should not be applied at this time. There will be opportunity in the future, in particular in regard to the Version 1 standards, to group and rename/renumber standards.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

- Would approve the standards as presented.
- Would approve the standards conditioned on certain improvements being made.
- Would not approve the standards.
- Would abstain.

Comments

See Q 11 for items related to show stoppers.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We strongly believe that there should be only one functional entity with a "Reliability" designation", and that: "the existing "Reliability Co-ordinators" as designated by the Regions in their respective Reliability Plans should be registered as the Version Zero Reliability Coordinators."

Refer to the position paper submitted by the IMO on "RA vs RC Role - Version 0 Reliability Standards". During the balloting phase of version Zero, the IMO intends to vote in acceptance of Version 0 standards only upon a suitable resolution to the concerns and recommendations outlined in our position paper.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

In many standards, the compliance monitoring role has been assigned to an “Unaffiliated Third Party”. Is this entity intended to be an "RRO"? We suggest this role to be clarified and defined in the Version 0 glossary.

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)

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, in many of the standards the associated measures, compliance monitoring process and levels of non compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already, and (b) specified/addressed in the very near future, where these do not exist today.

In a few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility).

It appears that presently there are different sources of NERC definitions on BES. The BES definition has remained a continued issue. We are of the opinion that at this stage the suggested definition of BES be augmented by allowing regions to implement their own performance (studies) based definitions indicating what facilities are impactful outside of the local areas. Accordingly, the version 0 BES definition needs to be modified.

A list of specific deficiencies and/or inconsistencies is outlined under the Q13-Table below. We are facilitating NERC SDT in this matter by identifying issues and presenting the associated resolutions. It is our expectation that our noted/listed concerns (re: under Q13 below) will be addressed and corresponding improvements made in Version 0 reliability standards.

In a number of cases, references to existing policies are not mapped correctly within the new Version 0 requirements. We are facilitating the NERC SDT in this matter by identifying such inconsistencies or needed references. The specifics are mentioned in our separate attached response (see appendix in separate attachment).

Question 13: Comments on Specific Version 0 Standards

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. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 4.0	Remove the wording "with like values but opposite signs" in order to make more clarity in R4.
7.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 4.0	(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clearer role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.
8.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Under "Purpose", the last sentence should be read as follows: Violations are also reported to the compliance monitor.
8.0	<input type="checkbox"/> R <input checked="" type="checkbox"/> M Number 1.0	(Measures M1, M2 & M3) These measures in its present format outlines a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	<input type="checkbox"/> R <input type="checkbox"/> M Number	**Cont. from previous comment: The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system -ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.
9.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Under "Purpose", the last sentence be read as: “To ensure voltage levels, reactive flows, and reactive resources are monitored in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection”
12.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.
15.0	<input type="checkbox"/> R <input checked="" type="checkbox"/> M Number 1.0	(Also in Levels of Non-Compliance Lv 1&4) The terminology Responsible Entity and Requesting Entity needs to be more clearly outlined/qualified.
16.0	<input type="checkbox"/> R <input checked="" type="checkbox"/> M Number 1.0	Same comment as above.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
17.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 5.0	R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency.
17.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 6.0	Delete the word "all".
17.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to be incorporated in future via urgent SAR process. The remaining should be mapped into a version 0 accompanying Reference Document.
18.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Under "Purpose", the statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.
8.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Under "Applicability" and "Requirements", an example of confusions being created due to use of both RA and RC can be seen. This related to our comments outlined in Q1 of NERC Comment Form. We are of the opinion that there should not be both an RA and an RC. The evidences from these standards demonstrate that a use of both RA and RC terminology's creates more complexity and confusion in performing various operational tasks outlined in these standards.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>**Cont. from previous comment: Moreover, the complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays and confusion in performing various functions thereby impacting reliability. Accordingly, one function role (ultimate authority - RC) should be prescribed in version 0 standard.</p> <p>**This comment is also applicable to Standards 13, 14, 15, 18, 19, 20, 22, 23, 24, 37, 38, 40.</p>
18.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 3.0	<p>In the sentence: “Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator or Transmission Operator of the inability to perform the directive ...” The use of “or” is confusing and may create ambiguity. The specific role of entity responsible for ‘providing’ and ‘receiving’ information needs to be clarified. Should this be combined responsibility applicable to all or for any?</p>
20.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 7.0	<p>R7(b) should be read as Deploying/utilizing all available operating reserve</p> <p>R7(f) should be read as Reducing/shedding load,</p>
20.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Levels of Non-Compliance", it is not clear whether the term “plans” mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.</p>
20.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Attachment 020-1 (A-1), there is another example of confusions being created due to dual roles. Only ‘RC’ terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA’s thereby impacting reliability.</p>

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Attachment 1" of "Attachment 022-2", incident No. 7 and footnote should be modified to reflect IROL and a new reference.</p>
23.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Policy 5, Section G, Requirement 1 has been mapped into Draft 2, but excludes a secondary requirement contained in the current NERC Policy 5G, R1. That being: “Procedures shall also be established for the communication of information concerning sabotage events to the appropriate parties in the Interconnection.</p>
	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>**Cont. from previous comment: Moreover, the Draft 2 does not include any references to the one “Guide” point found in NERC Policy 5G, regarding establishing procedures for supplying information to the media. Would this be included in the associated ver 0 reference document. We are of the opinion that any critical/ criteria needs to be incorporated in future via urgent SAR process. The remaining should be mapped into a version 0 accompanying Reference Document.</p>
25.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Levels of Non-Compliance", The levels of non-compliance have been translated based on template P6T1. P6T1’s non-compliance were based on 14 elements/requirements of plan whereas, the attachment 025-01 now includes 20 elements (re: consideration in development of Emergency Plans).</p>
	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>**Cont. from previous comment: NERC may consider whether due to these increased requirements the numbers of elements triggering the non-compliance levels should also be changed or kept the same. e.g. “L1 – One of the applicable elements has not been addressed” may be revised as follows “L1 - Two of the applicable elements” etc....</p>

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
26.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Purpose", The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk</p>
27.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Levels of Non-Compliance", it appears that there is a reference to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not.....</p>
28.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Purpose", the following wording is suggested: Each reliability entity shall have a plan to continue</p>
28.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 1.0	<p>The term RC needs to be inserted into section of Applicability.</p>
28.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Levels of Non-Compliance", the reference to Requirement R1 should be corrected to P6T3 instead of P6T2. More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 instead of P6T2.</p>

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
29.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 1.0	R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC....".
29.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 4.0	The requirement R4 needs to be applied to the transmission Owner as well.
30.0	<input type="checkbox"/> R <input checked="" type="checkbox"/> M Number 1.0	Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.
31.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	Under "Levels of Non-Compliance Lv 3", "... not completed Criterion b) of Requirement 1-1." shall be read instead of "... not completed Criterion 2 of Requirement 1." To be consistent with the standard.
33.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	The term "reliability entities" needs to be defined to remove any ambiguity.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
34.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 1.0	The last sentence should read "These communication facilities shall be staffed..." instead of "These communications shall be staffed..."
35.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 2.0	Reword to "When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed."
37.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 7.0	We are of the opinion that there should not be both RA and an RC. Accordingly, one terminology should be used in this standard. See comments given in Q1. The information system (RCIS) related terminology should be used accordingly.
38.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 8.0	The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.
38.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 12.0	The end of the first sentence should read "...Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
38.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 17.0	<p>This requirement lacks clarity. It needs to be clarified that whether the word “limits” at the end of the last sentence refer to SOL or IROL or both?</p>
39.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 2.0	<p>For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."</p>
39.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 6.0	<p>The terminology "interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.</p>
51.0	<input checked="" type="checkbox"/> R <input checked="" type="checkbox"/> M Number	<p>For Sections 1-4: R1-1 Speaks about "planning" the system but does not speak about "designing" the system. We are of the opinion that the drafting team should consider the term are not synonymous and its inclusion in all 4 - 051 standards.</p> <p>In M1-2, delete "none identified" at the end of the measure.</p>
53.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number	<p>Section 1: R1-1 Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria.... The term "power pool" should be eliminated and replaced with appropriate FM terms, such as Transmission Operator.</p>

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.0	<input checked="" type="checkbox"/> R <input checked="" type="checkbox"/> M Number	<p>Section 1: R1-2, M1-1 “the Transmission System Providers and Transmission Owners ...” shall be read instead of “and the transmission users ...” to be consistent with the outlined purpose of this standard.</p> <p>Section 2: 2-1d same comment as above.</p>
56.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Section 1 & 2: Under "Compliance Monitoring Responsibility", the term “Unaffiliated Third Party” needs to be clarified.</p> <p>**This comment also applies to Standards 58 and 61.</p>
61.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Section 1: Under "Level 1 of Non-Compliance", “ ... and 061.1-R1-1.” shall be read instead of “... 061.” to be consistent with the standard.</p> <p>Section 1: Under "Level 4 of Non-Compliance", “ ... and the reporting procedures as required in Reliability Standard 061.1-R1-1.” shall be read instead of “... and the reporting procedures.” to be consistent with the standard.</p>
61.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number	<p>In R7-1, “... load management to Reliability Authority(ies) Coordinators and Transmission Operator(s) on request ...” shall be read instead of “...load management to system operators and security center coordinators on request ...” to be consistent with the standard.</p>
63.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number	<p>Section 2: It is suggested to add "facilities" after "...that owns protection system(s)...." In R2-1 and R2-2. R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.</p>

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>As currently stated, the levels of non-compliance are not selective. Some of the items listed in R1-1 are more critical than others. Missing R1-1 c is not the same as missing R1-1 h.</p>
72	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Compliance Monitoring Process" and "Reporting Requirements", TFCO's comments on this issue (June 13, 2004): The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO.</p>
72	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>**Cont. from previous comment: It is the opinion of the NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program and considerably weaken the effort. Such exceptions must not be permitted if the initiative is to succeed.</p>
9.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>Under "Measures", "Compliance Monitoring Process" and "Levels of Non-Compliance", there is a lack of a 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.</p>
18.0	<input type="checkbox"/> R <input type="checkbox"/> M Number	<p>**Cont. from previous comment: For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency. **This comment also applies to Standards 19, 21, 26, 34 and 35.</p>