

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.

A revision to Question 7 is the only change that has been made.

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.
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.)		
Name:	ISO/RTO Council Standards Review Committee	
Organization:	ISO/RTO Council	
Telephone:		
Email:		
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 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"/>	
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input checked="" 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 ISO/RTO SRC 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. We believe it is important to deploy a workable set of V0 standards aligned to the functional model.

Our concern with the Draft 2 standards is that responsibilities are now assigned to multiple authorities (i.e. transmission operator OR reliability authority will...). Having two entities with a reliability designation with overlapping roles and authorities introduces confusion and may lead to reliability problems.

We believe there should be one “ultimate authority” for wide-area oversight. As an interim measure, we support the retention of the existing RC and the existing operating agreements between the RC and those they are coordinating. NERC needs to urgently address the ambiguities between the current roles of the RC and the future responsibilities of the RA.

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

As stated in our response to question 1, the Functional Model must be updated to clearly and unambiguously define appropriate responsibilities for the authority entities.

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

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

If a standard is dependent on information that is included in a guide to be complete and implementable, then the guide needs to be included in the standard and subject to the same ANSI process for approval and revision as the standard. Guides providing supplemental information could be created as stand alone reference documents. Consideration of this should be addressed in the Version 1 Standards development process.

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

As stated in the question, Phase III and Phase IV standards should be reviewed by the Planning Standards Task Force as soon as possible. Any standards needed to support the NERC blackout recommendations may and should be entered into the standards development process as Urgent Action SARs separate from Version 0.

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

Methodologies for developing and review of ATC values should be developed as NAESB Business Practices.

Methodologies for developing and review of TTC must remain as a NERC Reliability Standard.

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

The IRC would note that the definition of Capacity Benefit Margin is not universally computed using Generation Planning criteria. There is no Generation Planning criteria in the current reliability standards and it is not uncommon to use Installed or Available capacity obligations as opposed to Generation criteria.

Standard 55 makes frequent reference to providing NERC and transmission users with updated CBM values. As written, the standard requires that CBM values be available to transmission users. CBM is used by RA and Transmissio Operators, not transmission users. NERC may examine an entity's REVIEW process, but as there is no agreed to NERC criteria on CBM, there is no need for NERC to examine the procedures used to compute CBM.

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

The use of TRM is a reliability tool so the methodology to calculate TRM should remain a Reliability Standard.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

Yes.

No.

Comments

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
Various	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input checked="" type="checkbox"/> Modify	<p>Several terms in the Glossary do not have definitions. The Glossary needs to be completed and reposted.</p>
Regional Reliability Organization	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input checked="" type="checkbox"/> Modify	<p>It is important that this definition be developed.</p>
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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

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

The ISO/RTO Council fully supports the Version 0 concept and hopes that outstanding issues can be resolved.

The ISO/RTO Council is concerned about the resolution of the RA v. RC issue.

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

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/terminology to be clarified and defined in the version 0 glossary.

It appears that presently there are different sources for NERC definitions of the 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 definitions based on appropriate regional criteria indicating what facilities are impacted Accordingly, the version 0 BES definition should be modified.

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
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