

Comment Form — Proposed "Refine Applicability of Approved Standards" SAR

Please use this form to submit comments on the proposed "Refine Applicability of Approved Standards" SAR. Comments must be submitted by **June 30, 2006**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Refine Applicability for Approved Standards" in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or by telephone at 609-452-8060.

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

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

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

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

Background Information

The requestor would like to receive industry comments on this SAR and to obtain the input of the industry prior to determining the final scope of the SAR. *Please limit your comments to the subject SAR* realizing there will be future opportunity to comment on any proposed standard. Accordingly, we request your comments be included on this form and e-mailed with the subject "Refine Applicability for Approved Standards" by **June 30, 2006** to sarcomm@nerc.com

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1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR — to focus on the Distribution Provider, Load-Serving Entity, Generator Owner and Generator Operator?

Yes

No

Comments While we agree that the review should focus on DP, LSE, GO and GOP, the time to review the standards is not now. Functional model Version 3 is currently being posted for comments. If all goes well, the model can be approved as early as this Fall's. Version 3 contains new/revise responsibilities of and relationship among many entities, including these four. We feel that a more appropriate time to review the standards would be after the approval of V3 of the functional model to ensure the applicable entity is correct as well.

3. Do you agree with the scope of the proposed SAR — to modify the applicability section of approved standards that don't already contain language identifying the subset of Distribution Providers, Load-Serving Entities, Generator Owners and Generator Operators who must comply with the standard's requirements?

Yes

No

Comments We generally agree with the approach.

The following is intended for Q4 but there is no input field under Q4, hence we provide our inputs here.

We are not certain of the criteria with which to select the standards listed in the SAR. We assume that if the applicability section of a standard contains one or more of these 4 entities, the standard will be included in the review. Using this criterion, we have identified that the following standards should also be included since a clear understanding of who must comply, applies to these as well :

CIP-002 to -009

EOP-004, -009

FAC-002, -008

MOD-024, -025

PRC-002 (requirement for RRO to develop requirements), -007, -008, -009, -021, -022

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On the other hand, among the standards listed, we are not certain that IRO-005 needs to be reviewed as the standard makes reference to an LSE only as a recipient of information, NOT stipulating responsibility for the LSE to meet any requirements.

4. Please identify any standards you believe should be added to or deleted from the list of standards identified in the SAR.

Additions/deletions to list of standard to be modified:

5. Do you agree that, in the future, standards that contain requirements for the Distribution Providers, Load-Serving Entities, Generator Owners or Generator Operators should contain additional clarification to identify specifically the subsets of these populations that must comply with the requirements?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments In addition to the functional model V3 timing issue we raised in Q1, we would also point out that the industry may soon be embarking on reviewing and revising some existing standards as result of FERC's ruling on the 102 submitted standards. In the next several months or year, priority and concentrated effort would likely be placed on modifying certain standards so that they can be enforced some time after ERO is set up. In this exercise, the applicability to any of the four entities (or to the RRO for setting regional requirements for these entities) can be reviewed at the same time. We therefore suggest that a priority list and review schedule be established to (a) take advantage of the expected standard review work, and (b) expand the scope of standard review as a result of the new/revised responsibilities and relationships identified in the V3 functional model.