

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.
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:	John Horakh - 09-27-2004	
Organization:	MAAC	
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Email:	john.horakh@conectiv.com	
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 checked="" 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"/>	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

There should be a note included, as part of the Version 0 Standards, that states the requirements assigned to current Reliability Coordinators will be reassigned to Reliability Authorities, if/when the NERC Functional Model is implemented.

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

Keeping responsibilities separated as much as possible is the way to go.

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

Version 0 should only reflect current approved policy, not possible future revisions, even if the revisions seem needed/likely.

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

The Version 0 Standards should contain only standard material. Guide material, if needed, should be kept in a separate document, but a reference to that guide document should be allowed in the Standard. The phrase Shall Be Considered in a Standard Attachment is not appropriate because there is no way to measure compliance, that is, did the entity consider this item. Attachment 027-1, as written, seems more like Requirements for the Standard, rather than Guides. It uses the words must and shall, which are requirements. The title says Elements for Consideration, but the lead sentence says The Restoration Plan must consider the following requirements. Even some of the numbered items are written as requirements. For example, item 7 says Documentation must be retained. Attachment 031-1, on the other hand, is written as a Guide, using the words suggested and should. This is a very long Guide, 35 pages, which is another reason to put it in a separate document.

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

Deleting the Planning Standards derived from Phase 3 and Phase 4 is clearly the right way to go. However, it is important to follow the recommended plan to enter the deleted Phase 3 and Phase 4 material into the full development process as SARs, either regular or Urgent Action. Otherwise, some valuable material could be left out of the NERC Reliability Standards. It is also important to process the deleted material that is related to the blackout recommendations using Urgent Action SARs, as recommended. This material needs to be quickly moved into the NERC currently approved standards area.

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

Section 054.3, which allows entities to question the methodologies and values calculated for TTC and ATC, seems mostly business related. The actual methodologies used and values calculated in Sections 054.1 and 054.2 seem mostly reliability related.

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

Sections 055.3 and 055.4, which deal with how CBM is used, seem mostly business related. Sections 055.1 and 055.2, which deal with CBM calculation methodologies and values, seem mostly reliability related.

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

Both Sections deal with TRM calculation methodologies and values, and seem mostly reliability related.

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

The Distribution Provider was NOT added to the list of entities that must comply with Standard 060.

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
	<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	
	<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 don't need any more complications right now.

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

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

No show stoppers now.

Question 12:

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

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
	<input type="checkbox"/> R <input type="checkbox"/> M Number	
	<input type="checkbox"/> R <input type="checkbox"/> M Number	
	<input type="checkbox"/> R <input type="checkbox"/> M Number	
	<input type="checkbox"/> R <input type="checkbox"/> M Number	



NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

September 30, 2004

TO: OPERATING COMMITTEE

Dear Members:

Reliability Coordinators Versus Reliability Authorities in Version 0 Reliability Standards

At their September 14 and September 15–16 meetings, the Reliability Coordinator Working Group (RCWG) and Operating Reliability Subcommittee (ORS) had a detailed discussion of draft 2 of the Version 0 reliability standards. This draft incorporates *both* the Reliability Coordinator and the Reliability Authority. There was concern expressed regarding registration of both the RC and RA functions and the potential confusion between the relationships and responsibilities. This may result in harming reliability in the interim until the RC and RA functions are clearly defined and agreed upon.

After considerable discussion, the ORS and RCWG approved the following motion in separate ballots:

Moved that 1) where Reliability Coordinators are referenced in today's operating policies, they be translated to Reliability Authorities in Version 0, and 2) for the initial registration only those organizations that are RCs today shall register as RAs.

In addition, the RCWG and ORS members will submit individual comments to the Version 0 Standard Drafting Team by the October 15 deadline.

Roger C. Harszy

Roger C. Harszy
Chairman, Operating Reliability Subcommittee

Sincerely,

James D. Castle

James D. Castle
Chairman, Reliability Coordinator Working
Group

/bsb

cc: Reliability Coordinator Working Group
Operating Reliability Subcommittee
Version 0 Drafting Team

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

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Robert Blohm
Organization:	Applied Statistician
Telephone:	609 585 5451
Email:	rb112@columbia.edu
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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Agree.

Disagree.

Comments

I answer only questions 6, 8, 10, 11, 12, 13

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.

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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.

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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.

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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.

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- 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.

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

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

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I answer only questions 6, 8, 10, 11, 12, 13

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

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

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

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

I answer only questions 6, 8, 10, 11, 12, 13

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
Reportable Disturbance	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input checked="" type="checkbox"/> Modify	Delete this definition & restore the definition that was contained in the "Supporting Notes" that were contained in Draft1 of Standard 2 but deleted from Draft2
Reportable Disturbance	<input type="checkbox"/> Delete <input type="checkbox"/> Add <input checked="" type="checkbox"/> Modify	See answer to question 13 for further justification
	<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	
	<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

I answer only questions 6, 8, 10, 11, 12, 13

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 answer to Questions 8 & 13

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

See answers to Questions 8 & 13

Question 12:

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

See answer to Questions 8 & 13

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
2.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number	Restore the "Supporting Notes" contained in Draft 1. They define the "scope" of the standard during multiple contingencies. No mandate and no notification was given for the sudden omission of the "Supporting Notes" from Draft 2. Without the "Supporting Notes" to which Policy 1 Section 2.5 was "mapped" into, the Standard is inoperable in the case of multiple contingencies. Policy 1 exempted recovery from multiple contingencies. Accordingly, the current Draft-2 misrepresents Policy 1.
2.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number	Restore the Policy 1 Section 2.4 definition of "reportable disturbance" that was contained in the "Supporting Notes" contained in Draft-1 but dropped from Draft-2, and that was replaced in Draft-2 by a glossary definition of "reportable disturbance" that misrepresents Policy 1. See comment to this definition in next box below and in answer to question 8.
2.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number 0.0	Glossary leaves the definition of "reportable disturbance" entirely to the Regional Reliability Organizations provided it's at least 80% of the worst contingency. To the contrary, the definition in Policy 1 & in the "Supporting Notes" (a) excluded "normal" operating characteristics, (b) specified only sudden, unanticipated losses of "supply-side" resources, & (c) allowed RROs to "reduce" the 80% threshold. So glossary definition is both more restrictive ("at least 80%") and broader (loss of load)
8.0	<input checked="" type="checkbox"/> R <input type="checkbox"/> M Number	The all-important wording "Cannot withstand next contingency" that exempts multiple-contingency recovery during the 30-minute recovery period in the Policy 2 diagram A.1.1 was never translated into the version-0 Standard. Accordingly, the current Draft-2 misrepresents Policy 2, renders IROL Standard 8 inoperable in the case of multiple contingencies, and renders IROL Standard 8 inconsistent with Policy 1 and with faithful rendering of DCS Standard 2 that exempts multiple-contingency recovery.