

# Comments Received Report

## Survey Details

**Name** 2014-04 Physical Security

**Description**

**Start Date** 2/20/2015

**End Date** 4/10/2015

### Associated Ballots

2014-04 Physical Security CIP-014-2 IN 1 ST

### The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators

6 — Electricity Brokers, Aggregators, and Marketers

7 — Large Electricity End Users

8 — Small Electricity End Users

9 — Federal, State, Provincial Regulatory or other Government Entities

10 — Regional Reliability Organizations, Regional Entities

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
Randi Heise	Dominion - Dominion Resources, Inc.	5		Dominion - RCS	Larry Nash	Dominion Virginia Power	SERC	1
					Louis Slade	Dominion Resources, Inc.	SERC	6
					Connie Lowe	Dominion Resources, Inc.	RFC	3
					Randi Heise	Dominion Resources, Inc,	NPCC	5
Michael Lowman	Duke Energy	1,3,5,6	FRCC,SERC,RFC	Duke Ballot Body Members	Doug Hils	Duke Energy	RFC	1
					Lee Schuster	Duke Energy	FRCC	3
					Dale Goodwine	Duke Energy	SERC	5
					Greg Cecil	Duke Energy	RFC	6
Ben Li	Independent Electricity	2	NPCC	ISO/RTO Council	Charles Yeung	SPP	SPP	2

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
	System Operator			Standards Review Committee	Christina Bigelow	ERCOT	TRE	2
					Terry Bilke	MICO	MRO	2
					Mark Holman	PJM	RFC	2
					Greg Campoli	NYISO	NPCC	2
					Ali Miremadi	CAISO	WECC	2
					Ben Li	IESO	NPCC	2
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
					Amy Casucelli	Xcel Energy	MRO	1,3,5,6
					Chuck Lawrence	American Transmission Company	MRO	1
					Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
					Dan Inman	Minnkota Power	MRO	1,3,5,6

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
						Cooperative, Inc		
					Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
					Jodi Jenson	Western Area Power Administration	MRO	1,6
					Larry Heckert	Alliant Energy	MRO	4
					Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
					Marie Knox	Midwest ISO Inc.	MRO	2
					Mike Brytowski	Great River Energy	MRO	1,3,5,6
					Randi Nyholm	Minnesota Power	MRO	1,5
					Scott Nickels	Rochester Public Utilities	MRO	4

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
					Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
					Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
Paul Haase	Seattle City Light	1,3,4,5,6	WECC	Seattle City Light	Pawel Krupa	Seattle City Light	WECC	1
					Dana Wheelock	Seattle City Light	WECC	3
					Hao Li	Seattle City Light	WECC	4
					Mike Haynes	Seattle City Light	WECC	5
					Dennis Sismaet	Seattle City Light	WECC	6
Shannon Mickens	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	SPP	2

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
					John Allen	City Utilities of Springfield	SPP	1,4
					Hollie Baker	Oklahoma Gas and Electric Company	SPP	1,3,5,6
					Mike Buyce	City Utilities of Springfield	SPP	1,4
					J.Scott Williams	City Utilities of Springfield	SPP	1,4
					Louis Guidry	Cleco Power LLC	SPP	1,3,5,6
					Jonathan Hayes	Southwest Power Pool Inc.	SPP	2
					Robert Hirschak	Cleco Corporation	SPP	1,3,5,6
					James Simms	Cleco Power LLC	SPP	1,3,5,6
					Jason Smith	Southwest Power Pool Inc	SPP	2
					Don Schmit	Nebraska Public Power District	MRO	1,3,5

## Survey Questions

See the Unofficial Comment Form on the [Project Page](#) for additional background information.

*If you would like to bypass taking the survey, click the radio button and scroll down to submit the survey.*

*This will allow you to view Social Survey and agree / disagree with an already posted comment using the “thumbs up / thumbs down” feature.*

*Submitting a “thumbs up / thumbs down” on another entity's comment enables a negative vote to count in the calculation of consensus.*

*I want to bypass taking the survey*

*1. The PSSDT has revised CIP-014-1, Physical Security, to address the directive from FERC to to remove the term “widespread” from Reliability Standard CIP-014-1.*

*Do you agree with the proposed revisions to the standard contained in CIP-014-2 as summarized above? If not, please provide specific comments regarding the revisions and any suggestions for appropriate revisions.*

Yes

No

---

## Responses By Question

See the Unofficial Comment Form on the [Project Page](#) for additional background information.

<p><b>John Fontenot - Bryan Texas Utilities - 1 -</b></p> <p>Selected Answer:</p> <p><b>Answer Comment:</b></p> <p><b>Document Name:</b></p> <p><b>Likes:</b> 0</p> <p><b>Dislikes:</b> 0</p> <hr/> <p><b>John Fontenot - Bryan Texas Utilities - 1 -</b></p> <p>Selected Answer:</p> <p><b>Answer Comment:</b></p> <p><b>Document Name:</b></p>
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**Likes:** 0

**Dislikes:** 0

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**Silvia Mitchell - NextEra Energy - Florida Power and Light Co. - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ken Lindberg - Bryan Texas Utilities - 5 - TRE**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Frank McElvain - Siemens - Siemens PTI - 7 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Amanda Owen - AEP - NA - Not Applicable - TRE,SPP,RFC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ken Lindberg - Bryan Texas Utilities - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Herb Schrayshuen - Herb Schrayshuen - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Kiguel - David Kiguel - 8 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Chris Scanlon - Exelon - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Allen Wallace - Fayetteville Public Works Commission - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dana Wheelock - Seattle City Light - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Brian Shanahan - National Grid USA - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Phil Hart - Associated Electric Cooperative, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Alex Chua - Pacific Gas and Electric Company - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Stephen Pogue - M and A Electric Power Cooperative - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Romel Aquino - Edison International - Southern California Edison Company - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Romel Aquino - Edison International - Southern California Edison Company - 3 -**

Selected Answer:

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**Likes:** 0

**Dislikes:** 0

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**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Matt Jastram - Portland General Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Paul Haase - Seattle City Light - 1,3,4,5,6 - WECC**

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Selected Answer:

**Answer Comment:**

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**Likes:** 0

**Dislikes:** 0

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**Michael Brytowski - Great River Energy - 1 - MRO**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Donna Turner - APS - Arizona Public Service Co. - 1,3,5,6 - WECC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Matt Stryker - Matt Stryker On Behalf of: Jason Snodgrass, Georgia Transmission Corporation, 1**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Randi Heise - Dominion - Dominion Resources, Inc. - 5 -**

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**Dislikes:** 0

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**Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1,3 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**David Jendras - Ameren - Ameren Services - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Catherine Wesley - PJM Interconnection, L.L.C. - 2 - SERC,RFC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Terry BlIke - Midcontinent ISO, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Bob Reynolds - Southwest Power Pool Regional Entity - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

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**Dislikes:** 0

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**Greg LeGrave - Integrys Energy Group, Inc. - Wisconsin Public Service Corporation - 3 -**

Selected Answer:

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

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**Dislikes:** 0

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**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kelly Dash - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Tony Eddleman - Nebraska Public Power District - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Mertz - PNM Resources - 3 -**

Selected Answer:

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Don Schmit - Nebraska Public Power District - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -**

Selected Answer:

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**Dislikes:** 0

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**Chris de Graffenried - Con Ed - Consolidated Edison Co. of New York - 1 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jamison Cawley - Nebraska Public Power District - 1 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kent Kujala - DTE Energy - Detroit Edison Company - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Silvia Mitchell - NextEra Energy - Florida Power and Light Co. - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Daniel Herring - DTE Energy - Detroit Edison Company - 4 -**

Selected Answer:

**Answer Comment:**

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**Likes:** 0

**Dislikes:** 0

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**Daniel Herring - DTE Energy - Detroit Edison Company - 4 -**

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**Dislikes:** 0

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**Warren Cross - ACES Power Marketing - 6 - MRO,TRE,SERC,SPP,RFC**

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**Likes:** 0

**Dislikes:** 0

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**Dan Bamber - ATCO Electric - 1 - WECC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Paul Malozewski - Hydro One Networks, Inc. - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro One Networks, Inc., 1, Farahbakhsh Payam

**Dislikes:** 0

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**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Steve Johnson - Western Area Power Administration - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael DeLoach - AEP - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Matt Jastram - Portland General Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Erika Doot - U.S. Bureau of Reclamation - 5 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Spencer Tacke - Modesto Irrigation District - 4 -**

Selected Answer:

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**Dislikes:** 0

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**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Richard Vine - California ISO - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Peter Heidrich - Florida Reliability Coordinating Council - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Teresa Cantwell - Lower Colorado River Authority - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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***Submitting a "thumbs up / thumbs down" on another entity's comment enables a negative vote to count in***

*the calculation of consensus.*

**John Fontenot - Bryan Texas Utilities - 1 -**

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**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

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**Dislikes:** 0

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**Silvia Mitchell - NextEra Energy - Florida Power and Light Co. - 6 -**

Selected Answer: I want to bypass taking the survey

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**Likes:** 0

**Dislikes:** 0

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**Ken Lindberg - Bryan Texas Utilities - 5 - TRE**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Frank McElvain - Siemens - Siemens PTI - 7 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Amanda Owen - AEP - NA - Not Applicable - TRE,SPP,RFC**

Selected Answer:

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**Likes:** 0

**Dislikes:** 0

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**Ken Lindberg - Bryan Texas Utilities - 5 -**

Selected Answer: I want to bypass taking the survey

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Herb Schrayshuen - Herb Schrayshuen - 2 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**David Kiguel - David Kiguel - 8 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Chris Scanlon - Exelon - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Allen Wallace - Fayetteville Public Works Commission - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer: I want to bypass taking the survey

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dana Wheelock - Seattle City Light - 3 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Brian Shanahan - National Grid USA - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Phil Hart - Associated Electric Cooperative, Inc. - 1 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

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**Alex Chua - Pacific Gas and Electric Company - 5 -**

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**Dislikes:** 0

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**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

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**Likes:** 0

**Dislikes:** 0

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**Stephen Pogue - M and A Electric Power Cooperative - 3 -**

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**John Fontenot - Bryan Texas Utilities - 1 -**

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**John Fontenot - Bryan Texas Utilities - 1 -**

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**Romel Aquino - Edison International - Southern California Edison Company - 3 -**

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**Likes:** 0

**Dislikes:** 0

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**Romel Aquino - Edison International - Southern California Edison Company - 3 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

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**Likes:** 0

**Dislikes:** 0

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**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Matt Jastram - Portland General Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Paul Haase - Seattle City Light - 1,3,4,5,6 - WECC**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Brytowski - Great River Energy - 1 - MRO**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Donna Turner - APS - Arizona Public Service Co. - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Matt Stryker - Matt Stryker On Behalf of: Jason Snodgrass, Georgia Transmission Corporation, 1**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Randi Heise - Dominion - Dominion Resources, Inc. - 5 -**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1,3 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**David Jendras - Ameren - Ameren Services - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Catherine Wesley - PJM Interconnection, L.L.C. - 2 - SERC,RFC**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Terry BlIke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Bob Reynolds - Southwest Power Pool Regional Entity - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Greg LeGrave - Integrys Energy Group, Inc. - Wisconsin Public Service Corporation - 3 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kelly Dash - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6 - NPCC**

**Selected Answer:** I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Tony Eddleman - Nebraska Public Power District - 3 -**

**Selected Answer:** I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Mertz - PNM Resources - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Don Schmit - Nebraska Public Power District - 5 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Tallahassee Electric (City of Tallahassee, FL), 1, Langston Scott

**Dislikes:** 0

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**Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Chris de Graffenried - Con Ed - Consolidated Edison Co. of New York - 1 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jamison Cawley - Nebraska Public Power District - 1 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kent Kujala - DTE Energy - Detroit Edison Company - 3 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Silvia Mitchell - NextEra Energy - Florida Power and Light Co. - 6 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Daniel Herring - DTE Energy - Detroit Edison Company - 4 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Daniel Herring - DTE Energy - Detroit Edison Company - 4 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Warren Cross - ACES Power Marketing - 6 - MRO,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dan Bamber - ATCO Electric - 1 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Paul Malozewski - Hydro One Networks, Inc. - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Steve Johnson - Western Area Power Administration - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael DeLoach - AEP - 3 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Matt Jastram - Portland General Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Erika Doot - U.S. Bureau of Reclamation - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Spencer Tacke - Modesto Irrigation District - 4 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Richard Vine - California ISO - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Peter Heidrich - Florida Reliability Coordinating Council - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Teresa Cantwell - Lower Colorado River Authority - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***1. The PSSDT has revised CIP-014-1, Physical Security, to address the directive from FERC to to remove the term “widespread” from Reliability Standard CIP-014-1.***

***Do you agree with the proposed revisions to the standard contained in CIP-014-2 as summarized above? If not, please provide specific comments regarding the revisions and any suggestions for appropriate revisions.***

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Silvia Mitchell - NextEra Energy - Florida Power and Light Co. - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ken Lindberg - Bryan Texas Utilities - 5 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Frank McElvain - Siemens - Siemens PTI - 7 -**

Selected Answer: No

**Answer Comment:**

The removal of widespread is ok, but there is a larger problem.

The CIP-014-2 Standard is missing some fundamental elements in R1 and R2 to assure reliability if the contemplated contingency were to actually occur, and to be consistent with other standards. To approve the standard as currently written creates inconsistencies among the entire family of reliability standards.

Station or substation damage would likely include equipment that could currently take as long as 16 months to replace. With such a lengthy period of time in which a damaged station could be out-of-service, the standard needs to explicitly require determination of limits under the system's new normal condition, and to accommodate more probable N-1 contingencies.

CIP-014 should also be consistent with other NERC standards, such as TOP-004, which requires operation within known operating limits, and preparing for the next contingency within 30 minutes. It is unrealistic to expect these limits to be determined in real-time after a substation-out event as contemplated in CIP-014.

The level of study performed in preparation for a loss of a substation (or station) can vary from one organization to another and not every system limit needs to be determined in advance. However, minimally, CIP-014 should require that generating units are confirmed to remain stable for the next N-1 contingency, that current IROLs are not degraded in the new normal condition, and that generation contingency reserves remain adequate.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Amanda Owen - AEP - NA - Not Applicable - TRE,SPP,RFC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ken Lindberg - Bryan Texas Utilities - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Herb Schrayshuen - Herb Schrayshuen - 2 -**

Selected Answer: No

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Kiguel - David Kiguel - 8 -**

Selected Answer: No

**Answer Comment:**

My comment addresses the proposed Implementation Plan. While accepting that the change in the proposed standard is minor with respect to the currently approved version, it would be advisable to have an effective date that gives a more reasonable time, e.g. 30 days after the applicable date instead of the proposed day immediately after approval or day after the effective date of Version 1. This in order to permit relevant entities to do any necessary administrative work required for implementation.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: Yes

**Answer Comment:**

Exelon agrees with the SDT proposal to remove the term "widespread" from Reliability Standard CIP-014-1. With that change we believe the standard is responsive to the directive and supportive of reliability.

We do not agree that an alternative modification is necessary to meet the concern raised in the Directive. Alternative modifications are likely to delay implementation and lead to new revisions requiring further clarification with no appreciable gain in reliability.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Allen Wallace - Fayetteville Public Works Commission - 3 -**

Selected Answer: No

**Answer Comment:**

The concern with removing the term "widespread" is that it potentially imposes the requirements of the standard upon smaller

substations and entities that could have minimal impact on the BES. While I would prefer a more quantifiable determinant of applicability (customers affected, miles of transmission, load or generation lost, etc.) I believe that widespread is better than no discriminant at all.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dana Wheelock - Seattle City Light - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

With the word “widespread” removed, R1 is stating that if rendering a station inoperable results in any instability (large or small), the station should be declared critical. Depending on the severity of an instability, there may or may not be an impact on the operation of the interconnection. We are proposing the following modification to R1 to make it clearer in terms of reliability impact on the “Interconnection” in which the assessed facilities lie.

“Each Transmission Owner shall perform an initial risk assessment and subsequent risk assessments of its Transmission stations and Transmission substations (existing and planned to be in service within 24 months) that meet the criteria specified in Applicability Section 4.1.1. The initial and subsequent risk assessments shall consist of a transmission analysis or transmission analyses designed to identify the Transmission station(s) and Transmission substation(s) that if rendered inoperable or damaged could result in a critical impact on the operation of the interconnected (or neighboring) power system by causing instability, uncontrolled separation, or Cascading within an Interconnection.”

**Document Name:**

**Likes:** 1 Herb Schrayshuen, 2, Schrayshuen Herb

**Dislikes:** 0

---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Shanahan - National Grid USA - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Phil Hart - Associated Electric Cooperative, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Alex Chua - Pacific Gas and Electric Company - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Stephen Pogue - M and A Electric Power Cooperative - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Romel Aquino - Edison International - Southern California Edison Company - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Romel Aquino - Edison International - Southern California Edison Company - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Matt Jastram - Portland General Electric Co. - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Paul Haase - Seattle City Light - 1,3,4,5,6 - WECC**

Error: Subreport could not be shown.

**Selected Answer:** Yes

**Answer Comment:**

Seattle City Light supports the proposed revisions expressed in draft CIP-014-2 to remove the undefined term "widespread" and votes affirmative. In particular Seattle supports the new guidance language added to the Standard and supporting documents to explain what is meant by the term "widespread" that would no longer be included in the Standard.

Seattle, however, would support the proposed draft further if the term "widespread" was not simply removed from CIP-014-2 but replaced everywhere by "critical." Although "critical" is no more defined than "widespread," the term is the exact word used by FERC in its Order requesting removal of "widespread" and relates directly to FERC and NERC guidance on the matter.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Brytowski - Great River Energy - 1 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Donna Turner - APS - Arizona Public Service Co. - 1,3,5,6 - WECC**

**Selected Answer:** No

**Answer Comment:**

All though we agree the with the removal of the word “widespread” from the standard, we feel leaving the word “instability” in the standard still makes it vague and inconsistent. We suggest that both word “widespread” and “instability” be taken out to read R1 as follows:

“... The initial and subsequent risk assessments shall consist of a transmission analysis or transmission analyses designed to identify the Transmission station(s) and Transmission substation(s) that if rendered inoperable or damaged could result in uncontrolled separation, or Cascading within an Interconnection.

The criticality of a facility to an interconnection is determined by its impact and not by instability. Instability is a symptom and not the final consequence. There are various types of instabilities and with consequence varying from a small 10 W generation tripping to an interconnection braking up and many things in between. There are many other symptoms which are also indicators of cascading such as excessive overload, very low voltages etc. but none of them are called out. So why leave instability in there?

The above proposed wording preserves all of the impact without dwelling on symptoms.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Matt Stryker - Matt Stryker On Behalf of: Jason Snodgrass, Georgia Transmission Corporation, 1**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Randi Heise - Dominion - Dominion Resources, Inc. - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1,3 - MRO**

Selected Answer: No

**Answer Comment:**

**FERC Order No. 802 states on page 18:** “The definition in Requirement R1 should not be dependent on how an applicable entity interprets the term “widespread” but instead should be modified to make clear that a facility that has a critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1.”

Rather than merely remove the word “widespread,” NERC could better comply with the FERC order to provide clarity with a simple rearrangement of terms.

**By reordering R1 from:**

...if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection.

**To:**

...if rendered inoperable or damaged could result in uncontrolled separation or Cascading within, or the instability of, an Interconnection.

This reorganization maintains all the wording of R1 without introducing any undefined or subjective terms, but more clearly ties the term “instability” to “Interconnection.” This better reflects the FERC intention of affecting an interconnection, and by changing the intervening modifier between the terms “instability” and “Interconnection” from “within” to “of” addresses the industry concern that R1, as left without the term “widespread,” could be interpreted as applying to localized areas of instability

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: No

**Answer Comment:**  
ERCOT supports and references the comments to be filed by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Jendras - Ameren - Ameren Services - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Catherine Wesley - PJM Interconnection, L.L.C. - 2 - SERC,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Terry Blilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

While we agree that the revision addresses the directive, it's unfortunate that this required change muddles common understanding of NERC's terms and definitions.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Bob Reynolds - Southwest Power Pool Regional Entity - 10 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Duke Energy would like to thank the SDT for their efforts on this project. In addition, we agree with the changes made by the SDT.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Greg LeGrave - Integrys Energy Group, Inc. - Wisconsin Public Service Corporation - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**NSRF's concerns with the proposed changes to CIP-014-2 standard.**

1. Removal of the term , “widespread”, from R1 without replacement text in R1 - The qualifying concept of “widespread” was removed from R1 without replacing it with alternate text to address the Commission’s concerns. This approach makes the text in R1 even less defined than the original CIP-014-1 text. For example, the modified text offers no criteria to define the degree of reliability impacts due to instability or uncontrolled separation that would qualify a substation. This approach would allow applicable entites and regulators to interpret even minor or the R1 text to expect a substation to be qualified by local or minor reliability impacts as qualifying a substation. Addressing the Commission’s concerns by relegating criteria text to the Rationale for R1, rather than including criteria text in R1, allows the text to be disregarded because the rationale will be removed when the standard is finalized. Addressing the Commission’s concerns by relegating text to to the Guidance and Technical Basis section, rather than including text in R1, allows the text to be disregarded because, not being part of R1, the the application of guidance text may be a judgement call. Our concern stems from FERC Order 693, section 253, which states that “. . . compliance will in all cases be measured by determining whether a party met or failed to meet the Requirement given the specific facts . . .”. Each requirement must be clearly written for entities to follow. Any wording contained in a Guidance and Technical document is just that, wording. The words of “the Requirements within a standard define what an entity must do to be compliant”.

Alternate text for R1 to replace 2. Limiting the applicability of the term, “widespread”, to just instability – We interpret the qualification that the widespread reliability impact duerefers to “all three qualifying conditions – instability”, “ , uncontrolled separation” and “Cascading, not to just instability alone.

3. Insufficient Use of NERC-Defined Terms - Alternate text for “widespread” should incorporate be added to Requirement R1 and should make as much use of NERC defined-terms and concepts as much as possible. The NERC-defined term of “Adverse Reliability Impact” is used in Criterion 2.3 from Attachment 1 of the CIP-002-5.1 standard and For example, the NERC-defined concept of “Interconnection Reliability Operating Limit” (IROL) is used in Criterion 2.9 from Attachment 1 of the CIP-002-5.1 standard. The FAC-010-2 standard already allows Planning Coordinators (PCs) to establishdefine criteria and methodology for establishing planning horizon IROLs that are appropriate for the PC’s area and the Interconnection where the limit will be applied.

Based on the preceding comments, 4. Clarification of the term, Interconnection – We interpret that the use of capitalized word “Interconnection” within the Purpose, R1, R1.1 bullet 1 and 2, and associated VSLs refers to any of the Eastern, Western, ERCOT or Quebec Interconnections, not a regional Balancing Authority interconnection or regional Independent System Operator interconnection.

**NSRF suggests recommends the following wording changes to address the above concerns:**

**For Requirement R1**, we suggest that the term, “widespread” in R1 be replaced with text like, “. . . if rendered inoperable or damaged could result an Adverse Reliability Impact on the BES within an Interconnection due to instability, uncontrolled separation, or Cascading” or “. . . if rendered inoperable or damaged could result in the violation of one or more Interconnection Reliability Operation Limits (IROLs) within an Interconnection due to

instability, uncontrolled separation or Cascading within, or instability of, an Interconnection”.

Also based on the preceding comments, ATC suggests revising the wording of the draft text in **For the R1 Rationale and** in the **Guidance and Technical Basis** section. ATC proposes that the wording near the end**Section**, we suggest the following modifications:

- {C}- Replace the wording of “The Transmission Owner may determine the criteria for critical impact by considering, among other criteria, any of the clarification text be simplified to focus following: Criteria or methodology used by Transmission Planners or Planning Coordinators in TPL-001-4, Requirement R6; NERC EOP-004-2 reporting criteria; Area or magnitude of potential impact” with text that focuses on the concept on Adverse Reliability Impact or IROLs with language like, “The Transmission Owner should derive the criteria for the R1 risk assessment from the criteria used in the Adverse Reliability Impact definition or the criteria used to establish planning horizon IROLs as in per Requirement R3 of the NERC FAC-010-2 reliability standard Reliability Standard.”
  - Add clarification regarding the four kinds of instability that should be considered with wording like, “The consideration of instability should include all four kinds of instability - steady state voltage instability, steady state angular instability, dynamic voltage instability, and dynamic angular instability.”

**Document Name:**

**Likes:**

3 Nebraska Public Power District, 5, Schmit Don  
Nebraska Public Power District, 3, Eddleman Tony  
Nebraska Public Power District, 1, Cawley Jamison

**Dislikes:**

0

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: No

**Answer Comment:**

Although we agree with removal of the term “widespread” from the standard, we do not find the supporting justification provided in the Rationale for R1 and/or the Guidelines and Technical Basis for R1 to be adequate and/or convincing. Specifically, we do not find the three proposed criteria for critical impact as particularly instructive to help identify which instability – out of the potentially several instabilities seen in the transmission analyses performed for R1 – would qualify as having a critical impact on the operation of the interconnection. Without a clear technical guidance on what are the attributes (quantitative and qualitative) of a “critical impact instability” – that is, only an instability that has a critical impact on the operation of the interconnection, as stated in the March 7, 2014 Order – we do not see how the “excessive uncertainty in identifying critical facilities under R1” due to the undefined term “widespread” has been effectively addressed. Deletion of “widespread” without replacing it with adequately clear technical guidance on what constitutes a “critical impact instability” for an interconnection has only displaced the excessive uncertainty concern of FERC from “stability” to “critical impact” – it has not resolved it.

Since at least two of the three proposed criteria for critical impact puts the onus on the Transmission Owner (or its Transmission Planner) to determine (quantify) the “area or magnitude of potential impact” or determine how to identify “System instability” per R6 in TPL-001-4, this approach is prone to result in “critical impact” criteria that differ widely among the numerous Transmission Owners within each of the three Interconnections. This outcome would be incompatible and inconsistent with FERC’s stated guidance in the March 7, 2014 Order – and reiterated in the November 20, 2014 Order – that “**only** an instability” that has a “critical impact on the operation **of the interconnection**” (emphasis added) warrants finding that the facility resulting in the [critical interconnection impact] instability is deemed critical under Requirement R1.

We suggest the following two alternatives to address the above concerns:

1) Option 1: Enhance the technical guidance to provide a common Interconnection-wide criterion for what constitutes “critical impact” instability in the Interconnection. This would conceivably be different for each of the three Interconnections, resulting in three “critical impact” instability criteria. We note that this approach would be similar to what was adopted for the Order 754 stability studies/analyses. As such, we recommend using “Table C – Performance Measures” in the NERC Order 754 Data Request document as a good paradigm for developing an Interconnection-wide “critical impact” instability criteria.

2) Option 2: Modify Requirement R1 to recognize that only an instability that results in Cascading or uncontrolled separation within an Interconnection qualifies as one that has a “critical impact on the operation of the Interconnection”. This approach implicitly acknowledges that all other instabilities have a limited (local) impact and therefore do not result in widespread instability, and widespread instability is synonymous with Cascading or uncontrolled separation. The following change in R1 and part 1.1 is suggested: “...could result in Cascading or uncontrolled separation within an Interconnection caused by (voltage or angular) instability and/or successive failures of overloaded Facilities.”

Aside from the above, we suggest that the following compound sentence in the Rationale as well as Technical Basis be simplified and restructured to remove the existing contextual ambiguities that make comprehending its intent very difficult.

“The requirement is not to require identification of, and thus, not intended to bring within the scope of the standard a Transmission station or Transmission substation unless the applicable Transmission Owner determines through technical studies and analyses based on objective analysis, technical expertise, operating experience and experienced judgment that the loss of such facility would have a critical impact on the operation of the Interconnection in the event the asset is rendered inoperable or

damaged.”

Further, we question if this sentence even belongs in the Rationale – it is hard to see how this provides a justification for Requirement R1. In fact, saying that “The requirement is not to require identification of...” appears to contradict the intent of the following verbiage in R1 “... transmission analyses designed to identify the...”.

Lastly, it appears that the changes made in the following paragraph in the Rationale for R1 have inadvertently resulted in an incomplete/incoherent sentence within the parenthesis.

[It] **Requirement R1** also meets the [portion of the] **FERC** directive [from paragraph 11] for periodic reevaluation **of the risk assessment** by requiring the risk assessment to be performed every 30 months (or 60 months for an entity that has not identified in a previous risk assessment [any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in widespread instability, uncontrolled separation, or Cascading within an Interconnection]).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Selected Answer:** No

**Answer Comment:**

With the word “widespread” removed, Requirement R1 implies that if and when a station becomes inoperable and a potential threat for instability (large or small), uncontrolled separation or cascading, the station should be declared critical. Depending on the severity of an instability, there may or may not be any adverse impact on the operation of the interconnection. For example, if a station in a pocket or remote area should become inoperable and a potential threat for instability, it may not create any adverse impact on interconnected operations. Hence, to capture the intent of the requirement such that it addresses facilities that can impact interconnected operations, suggest modifying R1 as follows (see words underlined and in bold):

R1. Each Transmission Owner shall perform an initial risk assessment and subsequent risk assessments of its Transmission stations and Transmission substations (existing and planned to be in service within 24 months) that meet the criteria specified in Applicability Section 4.1.1. The initial and subsequent risk assessments shall consist of a transmission analysis or transmission analyses designed to identify the Transmission station(s) and Transmission substation(s) that if rendered

inoperable or damaged could result in **a critical impact on the operation of the interconnected power system by causing** instability, uncontrolled separation, or Cascading within an Interconnection.

For the Rationale Box for R1, we suggest replacing “among other criteria” with “for example.” This wording clarifies that the examples given are merely examples and not the only options for determining critical impact.

“[...] the Transmission Owner may determine the criteria for critical impact by considering, **for example**, any of the following:

- Criteria or methodology used by Transmission Planners or Planning Coordinators in TPL-001-4, Requirement R6
- NERC EOP-004-2 reporting criteria
- Area or magnitude of potential impact”

In paragraph 6 of the FERC Docket No. RD14-6-000, “interconnection” is lower case. Should “interconnection” as used in the standard’s Rationale for Requirement R1 and in the Guidelines and Technical Basis on page 31 be upper or lower case?

To make the wording of the Rationale for Requirement R1 consistent with the wording in RD14-6-000, suggest rewording the second sentence to read “...applicable Transmission Owner determines through objective analysis, technical expertise, and experienced judgment...” R6 Severe VSL: “The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under

Requirement R5 but failed to implement procedures for protecting information per Part 6.3” should read “per Part 6.4”.

**Document Name:**

**Likes:** 2 Con Ed - Consolidated Edison Co. of New York, 1,3,5,6,  
Dash Kelly  
Con Ed - Consolidated Edison Co. of New York, 1, de  
Graffenried Chris

**Dislikes:** 0

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**Kelly Dash - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Tony Eddleman - Nebraska Public Power District - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Mertz - PNM Resources - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Don Schmit - Nebraska Public Power District - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -**

Selected Answer: No

**Answer Comment:**

Removing "widespread" from criteria will leave the Reliability Standard open to "local" impact assessments by the audit teams, which could have exponential implications even for small municipal utilities. Removing the term "widespread" opens the scope of the standard to unlimited interpretation. The term "widespread" has been commonly and generally used since the mandatory and effective date of the NERC Reliability Standards to exclude such common occurrences as a storm moving through the area (daily during the summer in Florida), causing damage up to and including

some transmission outages. Would a lightning strike on a bulk power substation causing it to operate be termed instability under the Reliability Standard or would the lightning strike also have to cause the connecting transmission lines to operate? Therefore, does removal of the word "widespread" for consideration of instability mean that every bulk power facility outage, for whatever reason is now in violation of instability? There has to be some degree of limiting language to prevent the unintended spiral that removal of the word "widespread" will cause. Entities are familiar with and understand the use of the term "widespread". Removing this modifier from the scope of assessment will require extensive instruction and scenario analysis to make the scope of the assessment clear.

**Document Name:**

**Likes:** 2 Tallahassee Electric (City of Tallahassee, FL), 1, Langston Scott  
Tallahassee Electric (City of Tallahassee, FL), 5, Webb Karen

**Dislikes:** 0

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**Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Chris de Graffenried - Con Ed - Consolidated Edison Co. of New York - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jamison Cawley - Nebraska Public Power District - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kent Kujala - DTE Energy - Detroit Edison Company - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Silvia Mitchell - NextEra Energy - Florida Power and Light Co. - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Daniel Herring - DTE Energy - Detroit Edison Company - 4 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Daniel Herring - DTE Energy - Detroit Edison Company - 4 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Warren Cross - ACES Power Marketing - 6 - MRO,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

1. The removal of the undefined term of “widespread” from R1 should have alternate text to address the Commission’s concern(s) and to provide industry with clarity to the applicability of transmission facilities. While we understand the drafting team’s response to FERC’s directive to remove “widespread,” this language should be modified to make clear that a facility that has a

critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1. This blanket removal of 'widespread' from the requirements makes the text in R1 even more vague and subjective than the original CIP-014-1 language that is subject to interpretation and may result in a standard that is not auditable. By removing the word widespread, there is no clear delineation of reliability impact(s) due to instability or uncontrolled separation that would qualify a substation. This language change will cause inconsistent implementation across the regions and Transmission Planners or Planning Coordinators. Furthermore, given the cost implications on a possible Transmission Owner, more clarity and certainty of scope is needed.

2. Adding to the Rationale and Guideline and Technical Basis for Requirement R1 does not address the FERC Directive. The Rationale section while assisting industry to better understand the intention of the PSSDT is not enforceable and will result in an inconsistent R1 implementation across the regions.

3. The PSSDT should refer to NERC defined-terms and concepts, where appropriate. To add clarity to 'widespread,' the PSSDT should consider the NERC defined terms of "Adverse Reliability Impact" (Criterion 2.3 from Attachment 1 of the CIP-002-5.1), "Interconnection Reliability Operating Limit" (Criterion 2.9 from Attachment 1 of the CIP-002-5.1), and the FAC-010-2 standard that is in place to assist Planning Coordinators (PC) to establish planning horizon IROLs that are appropriate for the PC's area and the Interconnections.

4. Thank you for time, attention and consideration regarding these CIP-014-2 comments.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dan Bamber - ATCO Electric - 1 - WECC**

Selected Answer: Yes

**Answer Comment:**

Agree that removing the term widespread removes some subjectivity, however additional clarity on what is meant by the term “instability” would be beneficial in helping entities determine the appropriate criteria to be applied, as part of their risk assessment, in the identification of facilities in-scope to this standard.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

Selected Answer: Yes

**Answer Comment:**

With the deletion of the term “widespread” from CIP-014, the TO

must *determine* whether instability, uncontrolled separation, or Cascading within an Interconnection could occur if the station was damaged or rendered inoperable. For jointly-owned facilities, i.e., two or more TOs at a Transmission station or Transmission substation, the Standard states the following on page 30 of 39:

“On the issue of joint ownership, the SDT recognizes that this issue is not unique to CIP-014, and expects that the applicable Transmission Owners and Transmission Operators will develop memorandums of understanding, agreements, Coordinated Functional Registrations, or procedures, etc., to designate responsibilities under CIP-014 when joint ownership is at issue, which is similar to what many entities have completed for other Reliability Standards.”

In order to delegate responsibility to a single TO at a jointly-owned facility to make the above cited determination and the remaining Requirements in the Standard, Seminole Electric has the following questions:

(1) Can a Coordinated Functional Registration agreement (CFR), Joint Registration Organization agreement (JRO), or Memo of Understanding (MOU) be drafted on a station-by-station basis between parties? Seminole Electric is unaware whether CFRs and JROs can be developed and approved by NERC on a station-by-station basis and requests more information on this issue.

(2) In delegating responsibility for the Requirements in jointly-owned facilities under CIP-014-2, can an MOU be a sufficient mechanism to delegate authority if drafted sufficiently, or does the drafting team reason that ultimately a CFR or JRO must be executed between the co-owners (multiple TOs) at a station? Seminole Electric has been told that MOUs may be ineffective in delegating responsibility for the Requirements for jointly-owned facilities and that CFRs and JROs should be executed instead.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Paul Malozewski - Hydro One Networks, Inc. - 3 -**

Selected Answer: Yes

**Answer Comment:**

Hydro One Networks Inc. supports the comments advanced by the NPCC RSC.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC**

**Selected Answer:** No

**Answer Comment:** Hydro-Quebec TransEnergie supports the comments from NPCC-RSC

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Steve Johnson - Western Area Power Administration - 1 -**

**Selected Answer:** No

**Answer Comment:** Western Area Power Administration supports the Bureau of Reclamation comments regarding the removal of "widespread". Specifically, we request the adoption of language referring to TPL-001-4 R6 for consistency.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael DeLoach - AEP - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Matt Jastram - Portland General Electric Co. - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

The group has a concern in reference to the removal of the term 'widespread' in that removing it doesn't provide any boundaries to the scope of the instability or cascading outages. With that being said, this can lead to continued inconsistency throughout the industry. We understand that the Commission has a large concern about the term 'widespread' being in the documentation and the group would like to propose alternative language stated as followed: "instability uncontrolled separation or cascading that would cause or affect an Operational IROL within the Interrconnection".

The group also has a concern pertaining to CIP-014 in reference to a Transmission Owner completing their assessment (which is due on or before October 15, 2015) more than 90 days before October 1. There is some confusion on when the verification would be completed (if the assessment was finished June 1). Does the Transmission Owner have 90 days from October 1 or 90 days from June 1? This would be with the assumption that the effective date is October 1. We would like the drafting team to provide more clarity in reference to Requirement R2.2 addressing this issue.

We have a concern about Requirement R4 and its timeline requirement. In the standard's Rationale Box for R4 (second paragraph), it states "Requirement R4 doesn't explicitly states when the evaluation has to be completed" however, Requirement R5 development of a security plan(s) depend on this information. We would like for the SDT to provide more detailed information on when the evaluation needs to be completed.

First line of the first paragraph of Requirement R3.... Page 9. The term 'control center' should be capitalized as its shown the Glossary of Terms. Additionally, this applicable for the last sentence of the paragraph.

First line of the first paragraph of Requirement R5.... Page 11. The term 'control center' should be capitalized as its shown the Glossary of Terms.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Erika Doot - U.S. Bureau of Reclamation - 5 -**

**Selected Answer:** No

**Answer Comment:**

The Bureau of Reclamation (Reclamation) does not agree with removing the term "widespread" from R1 without adding clarifying language in the text of the standard. This approach makes the text in R1 even less defined than the original CIP-014-1 text because it offers no criteria of what degree of reliability impacts due to instability or uncontrolled separation is appropriate to determine facilities identified under R1. This approach could cause a much broader range of facilities to come within the scope of the standard by allow interpretations that even minor or local reliability impacts result in some degree of "instability... within an interconnection." Reclamation is concerned that the removal of the term "widespread" could expand the standard to include remote facilities that if lost could impact relatively small and isolated load pockets. Reclamation suggests that the drafting team include a

footnote referencing TPL-001-4 R6 criteria, reference other specific criteria like facilities affecting IROs, or at least incorporate FERC's language "has a critical impact on the operation of the interconnection" into the language of R1. In the alternative, the drafting team could reference a specific area or magnitude of potential impact. Unlike the rationale statement, clarifying requirement language or a footnote would be an enforceable component the standard if approved by FERC. The clarifying language would ensure that the scope of facilities identified under R1 would not be dramatically broadened with the removal of the term "widespread."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Spencer Tacke - Modesto Irrigation District - 4 -**

**Selected Answer:** No

**Answer Comment:**

I am voting NO because I believe the Standard should be very specific as to what constitutes "damaged", if it is not equal to being "inoperable", as used in the Standard. Also, the Standard needs to be very specific about the method of "transmission analysis" for rendering the station "inoperable", such as complete loss of the station resulting in a three phase fault on the station bus, etc.. The Standard is very specific and clear as how to determine which facilities need to be analyzed (i.e., those exceeding an aggregate weighted value of 3000 as specified in Section 4.1.1.2), and it needs to be just as specific in defining "damaged" and the method of "transmission analysis".

Thank you.

Sincerely,

Spencer Tacke, MID

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

Selected Answer:

No

**Answer Comment:**

With the removal of the term “widespread,” Requirement R1 implies that, if and when a station becomes inoperable and a potential threat for instability (large or small), uncontrolled separation or Cascading, the station should be declared critical. However, whether there is an adverse impact on the “operation of the interconnection” depends on the severity of an instability. In particular, a station or substation may create local instability, but there may or may not have an adverse or critical impact on the “operation of the Interconnection.” For example, if a station in a pocket or remote area should become inoperable and a potential threat for instability, it may create local instability, but such local instability may not impact the operation of the interconnected system in any way. Hence, to declare such a station as “critical” would defeat the purpose of focusing security operations on those stations and substations that have a “critical impact on the operation of the Interconnection.”

The SRC appreciates that the Standard Drafting Team attempted to provide additional criteria to determine the criticality of impact by providing some guidance in the rationale section for Requirement R1. However, the SRC respectfully suggests that there is a potential that such guidance may result in diverse criteria regarding criticality, which would, in turn, result in substantially different determinations of criticality across and within the Interconnections. It may also create unintended complications regarding compliance with and activities performed under other reliability standards. Hence, given the interconnected nature of the grid and the reliability standards with which Transmission Operators and Owners must comply and to ensure that the requirement effectively conveys the intent to address facilities with a “critical impact of the operations of the interconnection” and is able to be applied consistently, the SRC recommends that Requirement R1 be modified as follows (see words in red):

R1. Each Transmission Owner shall perform an initial risk

assessment and subsequent risk assessments of its Transmission stations and Transmission substations (existing and planned to be in service within 24 months) that meet the criteria specified in Applicability Section 4.1.1. The initial and subsequent risk assessments shall consist of a transmission analysis or transmission analyses designed to identify the Transmission station(s) and Transmission substation(s) that if rendered inoperable or damaged could cause instability, uncontrolled separation, or Cascading that could result in critical, adverse impacts to the operation of the interconnected power system.

**Document Name:**

**Likes:** 1 California ISO, 2, Vine Richard

**Dislikes:** 0

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**Richard Vine - California ISO - 2 -**

**Selected Answer:** No

**Answer Comment:**  
I support the comments provided by the ISO/RTO Council Standards Review Committee

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Peter Heidrich - Florida Reliability Coordinating Council - 10 -**

Selected Answer: No

**Answer Comment:**

The proposed method of addressing the FERC directive to remove the term 'widespread' meets the specific language in the Order, however, it leaves the responsible entity and the Regional Compliance Organizations with regulatory uncertainty as to the scope of what constitutes 'instability' in regards to Requirement R1. The revised Rationale does little to clarify the issue for the responsible entity and the Regional Compliance Organizations. The Rationale box provides some insight, but does not provide the clarity needed in the standard. FERC stated that only an instability that has a "critical impact on the operation of the interconnection" warrants finding that the facility causing the instability is critical under Requirement R1. The SDT should build off of this concept to provide the needed clarity in the standard. One option would be to revise the requirement and then qualify what constitutes 'critical impact' from an operational perspective (for example: the loss would result in exceeding an operating limit). The proposed language for R1 is below.

"...The initial and subsequent risk assessments shall consist of a transmission analysis or transmission analyses designed to identify the Transmission station(s) and Transmission substation(s) that if rendered inoperable or damaged could result in instability that has a critical impact on the operation of the Interconnection, uncontrolled separation, or Cascading within an Interconnection."

The guidance provided in the text box only provides examples of criteria that "may" be considered. Again this provides no regulatory certainty for the responsible entity and the Regional Compliance Organization. Additionally, the guidance reintroduces the concept of an 'area or magnitude of potential impact' which was eliminated

from the Requirement with the deletion of the term 'widespread'. This concept should be removed from the guidance. Further, this guidance may introduce unintended consequences and could influence a weakening of the criteria established by the Planning Coordinators in response to R6 of TPL-004-1.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Teresa Cantwell - Lower Colorado River Authority - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Additional Comments**

## Andrea Basinski – Puget Sound Energy

There are a couple of things which seem confusing:

- There seems to be conflict with timelines, comparing the Standard itself to the Implementation Plan. R2.2 places a timeline for completion of 90 calendar days after the completion of the R1 assessment, and word has filtered down that WECC said that if the R1 assessment is completed prior to the effective date, the clock starts ticking on the R2.2 90 days.  
  
However, the implementation plan says that R2.2 has to be completed with 90 calendar days of the effective date of the Standard. That could be a very different end date for R2.2.
- CIP-014-2 is positioned to become effective the day after CIP-014-1 becomes effective, with -1 being retired at midnight of the same day it becomes effective. This might not be an issue of -1 is superseded by -2, and never becomes effective, but you never know.