

Comment Form — 2nd Posting of Reliability Coordination SAR

Please use this form to submit comments on the second draft of the Reliability Coordination SAR. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Reliability Coordination" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

Background Information

The purpose of this SAR is to review a set of standards that includes reliability coordinator requirements with the intent of eliminating duplicate requirements and upgrading and reorganizing the requirements.

Based on stakeholder comments, the drafting team made several significant changes to the first draft of the SAR, including the following:

- Reduced the number of standards addressed in this project by eliminating consideration of standards that have not been approved, and standards expected to be retired as part of the IROL Implementation Plan.
- Revised the Descriptions to state more clearly the approach the standard drafting team will take in determining what action to take with each requirement in the set of standards. The drafting team will work with stakeholders to determine whether to:
 - o Modify the requirement to improve its quality
 - o Move the requirement (into another SAR or Standard or to the certification process or standards)
 - o Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).
- Revised the descriptions of the 'Reliability Functions' to reflect the latest version of the Functional Model (V3).

The SAR Drafting Team asks that you review the revised SAR and then answer the questions on the following page.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments:

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

- Modify the requirement to improve its quality
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Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: However, this is a large scope (a large amount of work) for the standard drafting team. Wherever possible, it is recommended that the drafting team list and explain the criteria it is using so that it may be easier to achieve stakeholder consensus where many related changes are made. With such a large scope the drafting team should consider carefully how the changes are balloted so ballots don't fail because stakeholders object to a minor subset of issues in a particular ballot.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this

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set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

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Yes

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Comments:

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Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: We agree with improving the quality of the requirements, removing redundancies and those things that do not contribute to reliability.

It isn't clear what stakeholders will be involved to improve these standards. Is it the ballot body as a whole or some other forum? Since there is no drafting team roster, we are not sure who is working on this project and who are the stakeholders suggesting the changes to requirements.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: The FERC NOPR should not be used to change the standards. Items in the final order should be given due consideration.

Several of VO comments items are not clear. They are primarily bullet notes with no context. Is there additional information about these comments somewhere?

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments: We disagree with the assignment of Violation Severity Levels (VSL). The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. Yes/No requirements should not arbitrarily be counted as Severe violations. The proposed VSL breakdown in the SAR is not part of the Sanctions Guidelines and the proposed process has not been vetted in the industry.

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Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization
Lead Contact: Terry Bilke
Contact Organization: MRO for Group (Midwest ISO for Lead)
Contact Segment: 2
Contact Telephone: 317-249-5463
Contact E-mail: tbilke@midwestiso.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPSR	MRO	10
Joe Knight	GRE	MRO	10
Al Boesch	NPPD	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschnik	XEL	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Mike Brytowski, Secretary	MRO	MRO	10
27 Additional MRO Members	Not Named Above	MRO	10

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments: We agree with excluding standards still under development.

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

- Modify the requirement to improve its quality
- Move the requirement (into another SAR or Standard or to the certification process or standards)
- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: We agree with improving the quality of the requirements, removing redundancies and those things that do not contribute to reliability. We do not see a listing of the drafting team members and it is unclear what stakeholders will be involved to improve these standards.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: The FERC NOPR should not be used to change the standards. Items in the final order should be considered.

Several of VO comments items are not clear. It would help if these fill comments were posted somewhere for reference.

We disagree with the assignment of Violation Severity Levels (VSL). VSLs should not be skewed to inflate the sanctions associated with a requirement. The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. The proposed breakdown in the SAR is not part of the Sanctions Guidelines and has not been vetted in the industry.

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments:

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Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC CP9 Reliability Standards Working Group
Lead Contact: Guy V. Zito
Contact Organization: Northeast Power Coordinating Council
Contact Segment: 10
Contact Telephone: 212-840-1070
Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Ron Falsetti	The IESO, Ontario	NPCC	2
Roger Champagne	TransEnergie HydroQuebec	NPCC	1
Randy Macdonald	New Brunswick System Operator	NPCC	2
Herb Schrayshuen	National Grid US	NPCC	1
Al Adamson	New York State Reliability Council	NPCC	10
Kathleen Goodman	ISO-New England	NPCC	2
David Kiguel	Hydro One Networks	NPCC	1
William Shemley	ISO-New England	NPCC	2
Murale Gopinathan	Northeast Utilities	NPCC	1
Michael Schiavone	National Grid US	NPCC	1
Greg Campoli	New York ISO	NPCC	2
Donald Nelson	MA Dept of Tel.and Energy	NPCC	9
Ed Thompson	ConEd	NPCC	1
Guy V. Zito	NPCC	NPCC	10
Michael Rinalli	National Grid US	NPCC	1

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*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments:

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

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Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments:

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

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(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6129	
E-mail:	mcalimano@nyiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Name:	Mike Gentry	
Organization:	Salt River Project	
Telephone:	602-236-6408	
E-mail:	Mike.Gentry@srpnet.com	
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Background Information

The purpose of this SAR is to review the set of standards that includes reliability coordinator requirements with the intent of eliminating duplicate requirements and upgrading and reorganizing the requirements to ensure that there are requirements that address the reliability coordinator's processes, procedures, plans, tools, and authorities to support real-time operating reliability within its own reliability area and between reliability coordinator areas in support of reliability of the interconnected bulk power systems.

The scope of the SAR includes the following:

- The drafting team will review all of the requirements in this set of standards and eliminate all of the requirements that are redundant. There are redundancies between requirements in the IRO-sequence of standards and also redundancies between requirements in the IRO-sequence of standards and the ORG-sequence of standards, and redundancies with PER-004, COM-001, COM-002, and PRC-001. Note that there will be a new standard to address communication protocols (Project 2007-02) and requirements for real-time communication protocols need to be transferred to that new standard.
- The drafting team also needs to review requirements and ensure that the distinctions between the functional entity and the real-time system operator are clear and distinct. The requirements should be written for the functional entity.
- The drafting team also needs to clarify the responsibilities and authorities in the requirements when comparing the "reliability coordinator" and the "transmission operator."
- The drafting team needs to verify that requirements exempt the real time-operator from liability when making a good faith effort at preserving reliability.
- The drafting team needs to address the reliability coordinator's facilities. A challenge has been to require that entities have "facilities" in place and available to the real-time system operators. These facilities are reviewed during certification, and unless there is a specific requirement to review these facilities, they may not be reviewed after the initial certification. To eliminate redundancy between the "certification" standards and the standards that are aimed more at real-time operations, the certification standards could be phrased to clarify that entities are required to "have and maintain" the specified facilities. This would enable the compliance monitor to check facilities on a periodic basis. While checking the facilities that are used on a daily basis may not be necessary, making periodic checks of the facilities that are infrequently would motivate entities to maintain these facilities, e.g., "Shall have a back-up power supply for critical operations, and shall maintain and test at least once per year."
- The results of the Operating Committee's study on operator situational awareness tools should be used to verify that the requirements in the certification standards will meet reliability needs.
- This project also needs to be coordinated with the project for developing transmission operator and balancing authority standards (2007-06).
- IRO-001 has some "fill-in-the-blank" components to eliminate.

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- The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Posting of Reliability Coordination SAR

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: The FERC NOPR and FERC Staff comments under Standard PRC-001-0, System Protection Coordination, do not apply to Reliability Coordination. In fact, the current Standard, PRC-001-1, does not apply to Reliability Coordinators. This Standard should be removed from the scope of this SAR.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

Comment Form — 2nd Posting of Reliability Coordination SAR

Please use this form to submit comments on the second draft of the Reliability Coordination SAR. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Reliability Coordination" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

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 - o Modify the requirement to improve its quality
 - o Move the requirement (into another SAR or Standard or to the certification process or standards)
 - o Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).
- Revised the descriptions of the 'Reliability Functions' to reflect the latest version of the Functional Model (V3).

The SAR Drafting Team asks that you review the revised SAR and then answer the questions on the following page.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments:

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

- Modify the requirement to improve its quality
- Move the requirement (into another SAR or Standard or to the certification process or standards)
- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: The WECC RCCWG agrees with the overall approach. That said, there is currently another SAR in process that addresses communications protocols and paths. The referenced SAR, "Operating Personnel Communications Protocols" is also meant to address FERC comments relative to communications protocols. Having two separate SARs that address the same comment seems redundant.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Comment Form — 2nd Posting of Reliability Coordination SAR

Yes

No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments: The WECC RCCWG believes that revision to each existing Standard, as a result of this SAR, should be individually balloted, instead of grouped together in one ballot on the entire group of changes.

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Individual Commenter Information		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments:

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

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- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: We agree with improving the quality of the requirements, removing redundancies and those things that do not contribute to reliability.

It isn't clear what stakeholders will be involved to improve these standards. Is it the ballot body as a whole or some other forum? Since there is no drafting team roster, we are not sure who is working on this project and who are the stakeholders suggesting the changes to requirements.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: The FERC NOPR should not be used to change the standards. Items in the final order should be given due consideration.

Several of VO comments items are not clear. They are primarily bullet notes with no context. Is there additional information about these comments somewhere?

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments: We disagree with the assignment of Violation Severity Levels (VSL). The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. Yes/No requirements should not arbitrarily be counted as Severe violations. The proposed VSL breakdown in the SAR is not part of the Sanctions Guidelines and the proposed process has not been vetted in the industry.

To the extent that requirements are modified or moved, care should be taken to make sure that the two-way exchange of information between RC and TOP and RC and BA should be preserved.

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(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments:

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

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- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments:

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: The SAR needs to be further refined to identify those specific requirements that will be:

- 1) Reviewed as being duplicative
- 2) Considered being relocated
- 3) Considered being eliminated

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Comment Form — 2nd Posting of Reliability Coordination SAR

Yes

No

Comments: The SAR identified standards IRO-014 and IRO-015 on its first page but does not address these standards in Attachment 1. The SAR needs to be updated to either acknowledge that these two standards will not be changed or identify what needs to be corrected.

Attachment 1:

COM-001-0

NERC has a current effort to address communication facilities in standard EOP-008. This group needs to be aware of that effort and should insure that any change to COM-001 does not counter that effort of EOP-008.

How will this effort differ from the other NERC effort?

COM-002-1

NERC has a current effort to address communication protocol in emergencies with "Operating Personnel Communications Protocols." Similar to our previous comment this group needs to be aware of that effort and should insure that any change to COM-002 does not counter that groups efforts.

How will this effort differ from the other NERC effort?

IRO-001-0

Please provide additional information on the following bullet point:

"Reflect the process set forth in the NERC Rules of Procedures"

What specific sections of NERC Rules of Procedure will be reflected in IRO-001-0?

IRO-005-1

The first bullet point does not seem to fall within the goal of this SAR.

"Propose that the ERO conduct a survey of IROL practices and experiences."

This effort does not need to go through NERC Reliability Standards Development Process to be performed. NERC could take up this effort at any time and it will slow down this process if it is going to be included in this SAR.

PER-004-0

NERC has another group that is looking into to these concerns.

How will this effort differ from that effort?

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5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Susan Renne	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments: No comments

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

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- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: No comments

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: No comments at this time. We will comment when the standards are up for comment.

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comment Form — 2nd Posting of Reliability Coordination SAR

Comments: No comments

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments: No comments at this time. We will comment when the standards are up for comment.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	CJ Ingersoll	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments: CECD feels that given the number of standards that IRO-007-1 and IRO-010-1 may impact [IRO-002-1 R2, IRO-002-1 R6, IRO-003-2, IRO-004-1 R4 and R5, IRO-005-2 R1, TOP-003-0 R1.2, TOP-005-1 R1] CECD disagrees with removing them from consideration. We do agree with the decision to exclude ORG-027-1.

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

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Yes

No

Comments:

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

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No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
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Yes

No

Comments:

We agree with the reduction of standards to be included in this body of work. However, we suggest PRC-001 should also be eliminated from this SAR.

The title of the SAR is Reliability Coordination, but the purpose is to ensure requirements applicable to the Reliability Coordinator are clear, etc., etc. The second part of the Purpose is to ensure that "this set of requirements" is sufficient... , referring back to the first part of the sentence. PRC-001 does not apply to the Reliability Coordinators and is out of place in this SAR.

PRC-001 should not be included in this SAR nor the resulting standard development work under this SAR. First, PRC-001 does not apply to Reliability Coordinators and there is already a significantly large amount of work related to Reliability Coordinators under this SAR. Second, the SDT's attention should not be redirected to system protection coordination among BAs, TOPs, and GOPs. We disagree if the intent of the Requestor is to make PRC-001 applicable to Reliability Coordinators under this SAR; If that is the intent we suggest it be done in a separate SAR activity.

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

- Modify the requirement to improve its quality
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Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments:

Comment Form — 2nd Posting of Reliability Coordination SAR

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments:

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No additional comments

Comments:

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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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The SAR Drafting Team asks that you review the revised SAR and then answer the questions on the following page.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments: While IRO-007-1 through IRO-010-1 are currently open for a 30-day comment period until 4/20/07, this standards work plan effort should leave no stone unturned in developing quality standards. Consequently, IRO-007-1 through IRO-010-1 may contain requirements that are valuable and easily consolidated with the standards under review by this SAR. In addition, they may also contain duplicative requirements that could be consolidated as part of the review process of this SAR.

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

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Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: Rather than using the word quality to describe the outcome, the first bullet point above should say, "Modify the requirement to improve clarity and measureability while removing ambiguity." This way the drafting team could use a check list against each requirement to test whether it is clear, measureable, and unambiguous.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: Under the detailed description in the second paragraph, the SAR should be modified to include a line item to include "Improve clarity of, improve measureability of, and remove ambiguity from the requirements."

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4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments: This effort should leave no stone unturned in developing quality standards within the expertise and domain of this effort. Therefore, every effort must be made to ensure this round of work plan related standard revisions is as complete and all encompassing as is humanly possible to ensure to the extent possible that this standards process reaches a point that these standards are complete, accurate and only minor revisions are required to maintain them going forward. Tying the hands of the drafting team as suggested by "Several stakeholders" will only prolong the industry's work to achieve good, high quality requirements and standards. In addition, we should be using our resources as efficiently as possible. Allowing some latitude to the drafting teams to find and fix issues with standards that are related to the standards within their area of expertise and charge is a good thing to do at this point in the standards evolution process and conducive to the efficient use of resources. As a practical matter this process may never end, but it should reach a point that is much more manageable sooner rather than later.

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Individual Commenter Information		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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E-mail:	kgoodman@iso-ne.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Individual Commenter Information		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Comments:

Comment Form — 2nd Posting of Reliability Coordination SAR

Please use this form to submit comments on the second draft of the Reliability Coordination SAR. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Reliability Coordination" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

Background Information

The purpose of this SAR is to review a set of standards that includes reliability coordinator requirements with the intent of eliminating duplicate requirements and upgrading and reorganizing the requirements.

Based on stakeholder comments, the drafting team made several significant changes to the first draft of the SAR, including the following:

- Reduced the number of standards addressed in this project by eliminating consideration of standards that have not been approved, and standards expected to be retired as part of the IROL Implementation Plan.
- Revised the Descriptions to state more clearly the approach the standard drafting team will take in determining what action to take with each requirement in the set of standards. The drafting team will work with stakeholders to determine whether to:
 - o Modify the requirement to improve its quality
 - o Move the requirement (into another SAR or Standard or to the certification process or standards)
 - o Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).
- Revised the descriptions of the 'Reliability Functions' to reflect the latest version of the Functional Model (V3).

The SAR Drafting Team asks that you review the revised SAR and then answer the questions on the following page.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

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2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

- Modify the requirement to improve its quality
- Move the requirement (into another SAR or Standard or to the certification process or standards)
- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

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3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

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5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

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