

Comment Report

Project Name: 2017-07 Standards Alignment with Registration | Standards Authorization Request
Comment Period Start Date: 12/11/2017
Comment Period End Date: 1/9/2018
Associated Ballots:

There were 16 sets of responses, including comments from approximately 67 different people from approximately 51 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the proposed scope and objectives for Project 2017-07 described in the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.
2. The SAR Drafting Team has merged the Project 2017-07 Standards Alignment with Registration SAR and the MOD-032-1 SAR into a single SAR for this project. Do you agree with the merging of the two SARs into a single SAR for Project 2017-07? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.
3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC	Charles Yeung	SPP	2	SPP RE
					Ben Li	IESO	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Lori Spence	MISO	2	MRO
					Mark Holman	PJM	2	RF
					Matt Goldberg	ISONE	1	NPCC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hills	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
ACES Power Marketing	Jodirah Green	6	NA - Not Applicable	ACES Standard Collaborations	Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	6	Texas RE
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Paul Mehlhaff	Sunflower Electric Power Corporation	1	SPP RE
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Susan Sosbe	Wabash Valley Power Association	3	RF
Entergy	Julie Hall	5,6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC

Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion and ISO-NE	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC

					Quintin Lee	Eversource Energy	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					Greg Campoli	NYISO	2	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Daniel Grinkevich	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Brian O'Boyle	Con Ed - Consolidated Edison	5	NPCC
					Sean Cavote	PSEG	4	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Jeff McDiarmid	Southwest Powr Pool Inc.	2	SPP RE
					Louis Guidry	Cleco Corporation	1,3,5,6	SPP RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE

1. Do you agree with the proposed scope and objectives for Project 2017-07 described in the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC

Answer No

Document Name

Comment

The SRC understands the scope and objectives for this project. However, we seek more explanation to why this project needs to be moved forward at this juncture given the Standards Efficiency Review (SER) which is intended to be a whole-sale look at the Standards. The changes in Project 2017-07 appear to have little impact on the state of reliability. We understand the deregistration of the LSE is prompting these changes, but the processes that this SAR will change do not seem to be gravely impacted by that deregistration. Although the NERC standards that have been assigned to the LSE were to ensure certain data and information are provided to reliability related processes in MOD-032, NERC should provide more evidence that there was a problem in obtaining the information when the deregistration occurred.

Additionally, with some of the activity occurring regarding distributed energy resources and their impact on the BES, we believe it's time to pause and be sure we are able to get necessary data from DPs.

We suggest this project be put on hold pending the initial phase of the SER project which may better inform the scope of this proposal noting that this project is a Low Priority in the 2018 RSDP.

Further, INT- 004 PSE requirements have already been allocated to the North American Energy Standards Board (NAESB) and filed with FERC as NAESB Business Practice Standards. This already removed the responsibility for INT standards out of NERC into NAESB – so what is the risk to reliability if the INT-004 requirements no longer have obligations on the PSE?

(note – Although IESO signs onto the overall consensus IRC comments, IESO does not support the comments in response to Question #1)

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer No

Document Name

Comment

ERCOT agrees that the NERC Reliability Standards should be revised to remove references to functional entities that are no longer subject to registration with NERC and to modify requirements to reallocate duties formerly assigned to these retired functions. However, ERCOT recommends that all revisions—including those that could be addressed through later periodic review (i.e., the third category identified in the SAR)—be addressed as part of this project. There are no efficiencies to be gained by leaving these issues for a future project, and this would only delay the needed clarifications.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

We agree with the need to review the alignment issue, but reserve judgment on the proposed changes to the affected standards.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer

Yes

Document Name

Comment

Yes, there is agreement with the proposed scope and objectives for Project 2017-07 described in the SAR. Since the functional categories have been removed, updating all impacted standards is required to provide clarity to Registered Entities and Regional Entities.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Gallo - Austin Energy - 1,3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ozan Ferrin - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 5,6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	
Document Name	
Comment	
<p>Texas RE appreciates the project to align the Reliability Standards with the Risk-Based Registration initiative. Texas RE agrees with adding Underfrequency Load Shedding (UFLS) – only DPs to the applicability section of certain standards. Texas RE recommends the SAR drafting team also review the requirements of those standards to determine whether UFLS-only DPs should be added to the requirement language of those standards to ensure there are no reliability gaps.</p> <p>Additionally, Texas RE suggests the SAR drafting team consider adding UFLS-only DPs to the applicability and requirement section of the following standards:</p> <ul style="list-style-type: none"> · EOP-004 – Add UFLS-only DPs as an entity with Reporting Responsibility in Attachment 1 to the following Event Types: <ul style="list-style-type: none"> o Automatic firm load shedding &ge; 100 MW (via automatic undervoltage or underfrequency load shedding schemes, or RAS) – If the event occurred, a UFLS-only DP should be expected to have reporting responsibility. o Damage or destruction of a Facility - UFLS DPs should have reporting responsibilities since one of the last lines of reliability defense is underfrequency relaying entities. · FAC-002 - FAC-002 needs to include UFLS-only DPs in the applicability section so new or materially-modified existing Facilities are coordinated and studied appropriately. If FAC-002 does not include UFLS-only DPs, the UFLS-only DP may not coordinate and cooperate on studies with its Transmission Planner or Planning Coordinator in accordance with FAC-002-2 Requirement R3. · IRO-010 – If the UFLS-only DPs are not included, they may not provide data to its Reliability Coordinator in accordance with Requirement R3. This standard should include UFLS-only DP entities so that an RC can fully understand post-contingent projected system conditions (i.e. OPA and RTA) that may recognize a possible underfrequency event and corresponding reaction to said event. If the RC does not have the UFLS information available that analyses will be incomplete. The same issue applies to TOP-003. · COM-002 – If UFLS-only DP is not added to the applicability, that entity may not do the training required by COM-002-4 Requirement R3 or three part communication as required by COM-002-4 Requirement R6. A UFLS-only DP may receive Operating Instructions to coordinate the re-energization of underfrequency relay equipped load. That would indicate the need for proper communications between the appropriate parties. Furthermore, during a Blackstart scenario the UFLS-only DP may be required to not re-energize load (through an Operating Instruction) to help coordinate the stabilization of the grid during restoration. <p>Texas RE suggests modifying the SAR language to include these additional standards: <i>“Additionally, the project will include adding Underfrequency Load Shedding (UFLS)-only DPs to the Applicability Section and to the applicable Requirement language of COM-002, EOP-004, FAC-002, IRO-010, TOP-003, PRC-005, PRC-006 and other standards noted during this project. The project will also include reviewing and revising adding UFLS-only DP as appropriate to the Applicability Sections and Requirement language for PRC-004 and PRC-008 and any other Standard to which this issue may apply.”</i></p>	
Likes 0	
Dislikes 0	
Response	

2. The SAR Drafting Team has merged the Project 2017-07 Standards Alignment with Registration SAR and the MOD-032-1 SAR into a single SAR for this project. Do you agree with the merging of the two SARs into a single SAR for Project 2017-07? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

Yes, there is agreement with merging Project 2017-17 Standards Alignment with Registration and MOD-032-1 SARs. The removal of Load Serving Entities (LSE) in the MOD-032-1 standard updates are in alignment with the removal of Purchasing-Selling Entity (PSE) and Interchange Authority (IA) that requires minor revisions to their respected impacted standards to align with the post Risk Based Registration (RBR) impacts.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 5,6, Group Name Entergy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ozan Ferrin - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrew Gallo - Austin Energy - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC

Answer

Document Name

Comment

SRC has no opinion for this question

Likes 0

Dislikes 0

Response

3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF

Answer

Document Name

Comment

No comments.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC

Answer

Document Name

Comment

The IRC SRC asks whether this SAR is timely and whether there is truly a reliability gap if the changes are not made. We want to ensure that industry resources are made available to address the most critical reliability issues first. Now that NERC has begun a SER of all NERC standards on an expedited schedule, a wholesale re-look at all the standards; is it the best use of industry resources to begin another project that intends to open up the same standards to the standards development process that may also be subject to revisions through the SER process?

As a matter of efficiency, since the NERC Standards Process potentially opens up a standard to changes that were not contemplated in the SAR and can potentially extend the expected timelines to completion, should NERC explore alternative processes to reach industry consensus on projects such as this which are intended to complement already accepted changes by the industry (de-register LSEs)?

Likes 0

Dislikes 0

Response

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer

Document Name

Comment

1. In the Detailed Description section, “appropriate applicable entity” should be clarified to indicate that only NERC-registered entities will be potentially reassigned applicability.
2. Adding PRC-008-0 to the scope of this SAR is irrelevant as this Standard is governed by and was combined with PRC-005-2/PRC-005-6 effective 4/1/2015 and will be retired when the full Implementation Plan of PRC-005-6 is complete. (From IP: *Standards PRC-005 - 1.1b, PRC-008-0, PRC- 011- 0, and PRC- 017- 0 shall remain enforceable throughout the phased implementation period set forth in the PRC- 005 -2(i) implementation plan, incorporated herein by reference, and shall be applicable to a registered entity’s Protection System Component maintenance activities not yet transitioned to PRC-005- 2(i) or its combined successor standards. Standards PRC- 005- 1.1b, PRC- 008-0, PRC-011- 0, and PRC- 017- 0 shall be retired at midnight of March 31, 2027 or as otherwise made effective pursuant to the laws applicable to such Electric Reliability Organization (ERO) governmental authorities; or, in those jurisdictions where no regulatory approval is required, at midnight of March 31, 2027.*).
3. Adding PRC-004-5(i) to the scope of this SAR is irrelevant as UFLS-only DP’s do not typically own BES interrupting devices that would operate and therefore would not be obligated by this Standard’s Requirements R1 and R2. A UFLS-only DP who does own BES interrupting devices would be additionally registered as a Transmission Owner (TO) as an owner of BES Elements and therefore this functional registration would obligate the Standard’s applicability. Additionally, for a DP who owns a portion of a Composite Protection System, and would possibly be notified by another entity of a BES interrupting device operation per Requirement R3, would be additionally registered as a UFLS-only DP per the NERC Rules of Procedure, Appendix 5B: Registration Criteria for DP (*A DP - Provides and operates the “wires” between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the distribution function at any voltage. Note: As provided in Section III.b.1 and Note 5 below, a Distribution Provider entity shall be an Underfrequency Load Shedding (UFLS)-Only Distribution Provider if it is the responsible entity that owns, controls or operates UFLS Protection System(s) needed to implement a required UFLS program designed for the protection of the BES, but does not meet any of the other registration criteria for a Distribution Provider.*)
4. A definition for Underfrequency Load Shedding (UFLS) should be added to the Glossary of Terms to add clarity to the meaning of this term. Note that Undervoltage Load Shedding (UVLS) is currently in the Glossary of Terms (most recent definition effective 4/1/2017) but UFLS is not. FERC NOPR under Docket No. RM11-20-000; October 20, 2011 provides a reference to the 2003 Blackout Report (*U.S.-Canada Power System Outage Task Force, Final Report on the August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations at 92-93 (2004) (Blackout Report).*) and an “explanation” of UFLS which could be used as a reference for developing a definition (*[A]utomatic under-frequency load-shedding (UFLS) is designed for use in extreme conditions to stabilize the balance between generation and load after an electrical island has been formed, dropping enough load to allow frequency to stabilize within the island. All synchronous generators in North America are designed to operate at 60 cycles per second (Hertz) and frequency reflects how well load and generation are balanced—if there is more load than generation at any moment, frequency drops below 60 Hz, and it rises above that level if there is more generation than load. By dropping load to match available generation within the island, UFLS is a safety net that helps to prevent the complete blackout of the island, which allows faster system restoration afterward. UFLS is not effective if there is electrical instability or voltage collapse within the island.*)

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer

Document Name

Comment

Thank you for the opportunity to provide comments.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE dos not have additional comments.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and ISO-NE

Answer

Document Name

Comment

It would be helpful if the SAR contained the list of standards that are affected by the proposed changes.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Document Name

Comment

The SPP Standards Review Group (“SSRG”) generally supports the proposed scope and objectives for Project 2017-07 but reserves the right to provide additional comments once the standards drafting team issues draft revised standards for industry review.

At this time, the SPPRG would recommend the standards drafting team consider two generalized comments when drafting the initial revised standards:

Regarding MOD-32-1, SPP continues to review the SAR's proposal to replace "Load Serving Entity" with either a Distribution Provider, Balancing Authority, or other "other applicable entity." The SSRG understands "other applicable entity" to mean an applicable NERC Registered Entity, and this interpretation appears to be consistent with the SAR's categorization that "certain data from LSEs may need to be provided by other *functional entities* going forward (emphasis added)." The standards drafting team must ensure that the NERC Registered Entity ultimately determined to be the appropriate replacement for Load Serving Entity will be able to meet the current data reporting requirements identified in Attachment 1 of MOD-32-1. To that end, the standard drafting team must also ensure the Planning Coordinator or Transmission Planner's obligations will not be unreasonably impacted by the replacement of the Load Serving Entity function.

Regarding proposed changes to PRC-005 and PRC-006 to add Underfrequency Load Shedding (UFLS)-only DP to the applicability section of the standard(s), the SPPRG would recommend that the standards drafting team leverage pre-established language from existing standards, as appropriate, when updating PRC-005 and PRC-006. For example, the language in current PRC-004-5(i) at Section 4.2.2 provides the description "[u]nderfrequency load shedding (UFLS) that is intended to trip one or more BES elements" to clarify which sub-set of Distribution Provider facilities are included in the standard. Such language could be utilized in Sections 4 of PRC-005 and PRC-006 to clarify the applicability to the UFLS-only DP. In other words, the goal of updating PRC-005 and PRC-006 may be accomplished by utilizing current approved language related to the UFLS-only DP from other standards where appropriate.

Likes	0
Dislikes	0
Response	