NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Project Name: 2014-04 Physical Security

Comment Period Start Date: 2/20/2015

Comment Period End Date: 4/10/2015

Associated Ballot: 2014-04 Physical Security CIP-014-2 IN 1 ST

There were 28 sets of responses, including comments from approximately 80 different people from approximately 58 different companies representing 9 of the 10 Industry Segments as shown on the following pages.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Senior Director of Standards, Valerie Agnew (via email) or at (404) 446-2566.

Summary Consideration:
Most commenters agreed with the proposed revisions to address the directive from FERC Order 802 to remove the term widespread from the standard. The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove “widespread”. The SDT considered additional descriptive language in the requirement to replace “widespread” but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of “widespread”. The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry.

Summary of non-substantive revisions:

- Rationale for R1: Edited the second sentence for clarity.
- Rationale for R1 (second paragraph): Added back language that was inadvertently deleted previously.

- Severe VSL for R6: Corrected a reference to Part 6.3 to Part 6.4
- Updated the date in the footer.

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)
Warren Cross	ACES Power Marketing	6	MRO,TRE,SERC,SPP,RFC	ACES Standards Collaborators	Brazos Electric	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Randi Heise	Dominion - Dominion Resources, Inc.	5		Dominion - RCS	Larry Nash	Dominion Virginia Power	SERC	1
					Louis Slade	Dominion Resources, Inc.	SERC	6

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
					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 System Operator	2	NPCC	ISO/RTO Council Standards Review Committee	Charles Yeung	SPP	SPP	2
					Christina Bigelow	ERCOT	TRE	2
					Terry Bilke	MICO	MRO	2
					Mark Holman	PJM	RFC	2
					Greg Campoli	NYISO	NPCC	2

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
					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 Cooperative, Inc	MRO	1,3,5,6
					Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System	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)
					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
					Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
					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
					John Allen	City Utilities of Springfield	SPP	1,4
					Hollie Baker	Oklahoma Gas and Electric Company	SPP	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)
					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 Hirchak	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

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:

Response:

Likes: 0

Dislikes: 0

Ken Lindberg - Bryan Texas Utilities - 5 - TRE

Selected Answer: Yes

Answer Comment:

Response:

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.

Response: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of

“widespread”. The standard is written to allow flexibility in how the risk assessments are performed rather than create a prescriptive “one size fits all” requirement.

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Herb Schrayshuen - Herb Schrayshuen - 2 -

Selected Answer: No

Answer Comment:

Response:

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.

Response: The SDT does not believe that the Implementation Plan creates a burden for applicable entities. The SDT does not believe that an entity will need to repeat the initial risk assessment for CIP-014-2.

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.

Response: Thank you for your support.

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.

Response: The language of the requirement was revised to meet the FERC directive to remove the term 'widespread" and has been widely accepted by industry. The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so

because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread".

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."

Response: Use of the term "critical impact" does not provide any more clarity or guidance than using the term "widespread". The SDT decided to provide language in the guidance rather than try to revise the requirement to address the directive to remove "widespread".

Likes:	1	Herb Schrayshuen, 2, Schrayshuen Herb
Dislikes:	0	

Brian Shanahan - National Grid USA - 3 -

Selected Answer:	Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Alex Chua - Pacific Gas and Electric Company - 5 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Matt Jastram - Portland General Electric Co. - 5 -

Selected Answer:	Yes
Answer Comment:	
Response:	
Likes:	0
Dislikes:	0

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

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.
Response: Use of the term “critical impact” does not provide any more clarity or guidance than using the term “widespread”. The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove “widespread”. The SDT considered additional descriptive language in the requirement to replace “widespread” but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of “widespread”.		
Likes:	0	
Dislikes:	0	

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

Selected Answer:	Yes
Answer Comment:	
Response:	
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.

Response: The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but

decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread".

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:	Yes
Answer Comment:	
Response:	
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

Response: The SDT made the decision to add guidance and rationale rather than to expand

on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread". The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry.

Likes: 0

Dislikes: 0

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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.

Response: Thank you for your support.

Likes: 0

Dislikes: 0

David Jendras - Ameren - Ameren Services - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terry BIlke - 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.

Response: Thank you for your comment.

Likes: 0

Dislikes: 0

Bob Reynolds - Southwest Power Pool Regional Entity - 10 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

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.

Response: Thank you for your comment.

Likes: 0

Dislikes: 0

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

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 replace2. 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 incorporatebe 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 andFor 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 inper Requirement R3 of the NERC FAC-010-2 reliability standardReliability 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."
	Response: 1-3: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread". The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. **4: You are correct.**		
	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 Facilties.”

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]).

Response: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread". The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry.

Regarding your proposed edits to the Rationale for R1, the SDT concurs and has revised the language for clarity and to add the language previously deleted.

Likes:	0
Dislikes:	0

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

Selected Answer:	Yes
Answer Comment:	
Response:	
Likes:	0
Dislikes:	0

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”.

Response: Use of the term “critical impact” does not provide any more clarity or guidance than using the term “widespread”. The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove “widespread”. The SDT considered additional descriptive language in the requirement to replace “widespread” but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of “widespread”. The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry.

The use of Interconnection is intended to be one of the four Interconnections and the word should be capitalized.

The SDT considered revising the rationale based on your comment but decided to retain the original language. The SDT revised the R6 Severe VSL per your comment.

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

Michael Mertz - PNM Resources - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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.

Response: The additional guidance contained in the standard was developed to avoid inclusion of local impacts that would be adverse to reliability.

Likes:	2	Tallahassee Electric (City of Tallahassee, FL), 1, Langston Scott Tallahassee Electric (City of Tallahassee, FL), 5, Webb Karen
Dislikes:	0	

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

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.
Response: Rationales and guidance also inform auditors of the intentions of the drafting team to help ensure consistent auditing of the requirements.		
Likes:	0	

Dislikes:	0

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 critiera to be applied, as part of their risk assessment, in the identification of facilities in-scope to this standard.
Response: Instability refers to voltage or frequency instability and is widely accepted by industry.	
Likes:	0
Dislikes:	0

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.
Response: As long as a particular station or substation has been assessed, the drafting team does not have a preference as to how this is achieved. The joint-owners have to address the performance of this standard just like any other NERC standard that is applicable.		
Likes:	0	

Dislikes:	0

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

Selected Answer:	Yes
Answer Comment:	Hydro One Networks Inc. supports the comments advanced by the NPCC RSC.
Response:	
Likes:	0
Dislikes:	0

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

Selected Answer:	No

Answer Comment:

Hydro-Quebec TransEnergie supports the comments from NPCC-RSC

Response:

Likes: 0

Dislikes: 0

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.

Response: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC

directive to remove “widespread”. The SDT considered additional descriptive language in the requirement to replace “widespread” but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of “widespread”. The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. The SDT has added a reference to TPL-001-4, R6 in the rationale for R1 as well as in the guidance for R1.

Likes: 0

Dislikes: 0

Michael DeLoach - AEP - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes:	0

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

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 boundries 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 doucmenation and the group would like to propose alternative language stated as followed: "instability uncontrolled separation or cascasding 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.
	Response: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but	

decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread". The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. The SDT made the decision to add guidance and rationale rather than to expand on the requirement.

R1 must be completed on or before October 1. Entities have 90 days from October 1 to complete R2.

R4 and R5 are linked and must be completed 120 days after completion of R2. The SDT didn't develop a specific timeline to allow for flexibility in how an entity performed the two requirements. Rather than say, for example, that R4 must be completed in 60 days and R5 must be completed in an additional 60 days, the SDT allowed flexibility in when these two requirements are performed.

The SDT has used the undefined term "control center" throughout the standard. This was used because the definition of "Control Center" contains the Reliability Coordinator and Balancing Authority, which are not applicable under CIP-014-2.

Likes: 0

Dislikes: 0

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 IROLs, 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."
Response: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread". The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry. The SDT included a reference to TPL-001-4, R6 in the rational and guidance for R1.		
Likes:	0	
Dislikes:	0	

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

Response: The SDT made the decision to add guidance and rationale rather than to expand

on the requirement to address the FERC directive to remove "widespread". This guidance includes a reference to TPL-001-4, R6. The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread". The language of the requirement mirrors the language of the FERC order and has been widely accepted by industry.

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

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.

Response:
The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread".

Likes: 1 California ISO, 2, Vine Richard

Dislikes: 0

Richard Vine - California ISO - 2 -

Selected Answer: No

Answer Comment:

I support the comments provided by the

	ISO/RTO Council Standards Review Committee

Response: Thank you for your comment.

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 too 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.

Response: The SDT made the decision to add guidance and rationale rather than to expand on the requirement to address the FERC directive to remove "widespread". The SDT considered additional descriptive language in the requirement to replace "widespread" but decided against doing so because the additional descriptors did not provide clarity and resulted in similar ambiguity to the use of "widespread".

Likes: 0

Dislikes: 0

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.

  Response: The Implementation Plan is correct. The third party verification is to be completed within 90 days of the effective date of the standard, October 1, 2015.

- 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.

  Response: The Implementation Plan calls for the retirement of -1 immediately prior to the effective date of -2 so that there is no overlap of compliance.