

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

Please use this form to submit comments on the proposed SAR for Project 2007-06 — System Protection Coordination. Comments must be submitted by **July 10, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "System Protection" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert J. Rauschenbach	
Organization:	Ameren	
Telephone:	314-554-3535	
E-mail:	r-rauschenbach@ameren.com	
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 and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input checked="" 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 and Regional Entities

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Background Information

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The SAR proposes to address the FERC directives in Order 693 and to address a number of technical shortcomings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the “Standard Review Guidelines.”

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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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: None

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: No

Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: Development of intercompany short circuit modeling should be cover in a separate MOD standard. Maintaining one large overall regional short circuit model is neither practical nor necessary. Standard methods to exchange short circuit data of tie-line plus one breakered bus into the neighboring systems should be adeqaute and be developed. Otherwise Ameren agrees with SPCTF recommendations.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Thad K. Ness	
Organization:	American Electric Power (AEP)	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments: There might not be a directly reliability driver for improving this standard, but the standard should be improved to better clarify responsibilities.

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: None

Comments: None

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: Possibly

Comments: AEP and other utilities, with many years of experience serving customers and supporting the electric grid, have voluntarily integrated protection coordination processes into the core of their work practices. AEP fully supports improvements if they truly foster reliability and availability benefits to bulk power transfers. More Standards, Requirements, and Business Practices are not always better. If Standards create burdens on a utility's physical resources and budgets, then some mechanism must be available to allow for the needed changes.

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Comments: For clarifying protective systems, the standard should not use the term Bulk Electric System, but should instead specify a voltage threshold for impacts to bulk system transfers - specifically; 'Facilities operated 200 kV and above and Regionally-defined, Operationally Significant facilities operated greater than 100 kv, but less than 199 kV'. The term 'affects' also needs to be clarified. Inclusion of all facilities greater than 100 kV does not benefit the reliability of national bulk power transfers. For example, the loss or misoperation of a 138 kV line serving a localized load center would not be detrimental to bulk power transfers multiple busses away.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Co.	
Telephone:	262 506 6885	
E-mail:	jshaver@atcllc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments: Standard has much room for improvement.

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments: Moving R6 regarding SPS monitoring and status notification to more appropriate PRC SPS section makes sense.

Have concern about NERC SPCTF recommendation of merging system short-circuit databases for performing wide-area fault studies. See additional comments below.

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: Data entry and maintenance procedures for proposed wide-area short circuit model would need to be developed.

Comments: Creating and maintaining the proposed wide-area short-circuit database, although useful, might prove quite difficult to implement.

Among our concerns:

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Impedance units- Ohms or per unit? If per unit, using what common base?

CAPE to ASPEN & ASPEN to CAPE conversion issues?

Need for unique and consistent bus numbers for all busses in combined database.

If using CAPE, coordination and application of database categories.

Who would be responsible for merging the databases and then maintaining the common database? How often would the databases be remerged to reflect system changes?

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: Background Information Section on this comment sheet should read:

Please e-mail your comments on this form to sarcomm@nerc.net with subject "Protection Coordination SAR" in subject line, not "Protection Maintenance SAR" as stated.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Dean Bender	
Organization:	Bonneville Power Administration	
Telephone:	(360) 418-2040	
E-mail:	dabender@bpa.gov	
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 and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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1. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments: No known variance

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments:

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Nancy C. Denton	
Organization:	Consumers Energy Company	
Telephone:	517-788-1310	
E-mail:	ncdenton@cmsenergy.com	
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 and ISOs
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1. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: N/A

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: N/A

Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: None.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Doug Hohlbaugh	
Organization:	FirstEnergy	
Telephone:	330-384-4698	
E-mail:	hohlbaughdg@firstenergycorp.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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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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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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments: Under the section of Detailed Description it is stated:

"This project will address the issues identified by the System Protection and Control Task Force for the planning-related requirements in PRC-001 as well as any planning-related concerns identified in FERC Order 693. (The operations-related requirements in PRC-001 are being addressed under Project 2006-06.) A detailed listing of the areas of the existing standard that need improvement is provided in Attachment B titled "NERC SPCTF Assessment of Standard PRC-001-0 – System Protection Coordination"

It seems that it would be more effective to pull the PRC-001 standard from the scope of of the 2006-06 project which deals with multiple standards and allow this SDT to focus on all aspects of the PRC-001. The SPCTF raised concerns with PRC-001 in both the planning and operations time-frame and it does not appear that the 2006-06 project is scoped to address the SPCTF items.

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: FE agrees with the SPCTF that the TO, GO and DP should be added to the applicability section of this standard as many of the requirements will originate from these entities. However, it may be necessary to add the Transmission Planner (TP) entity for "planning" related requirements. For example, the existing R3 requires coordination of new or revised protection systems. It may be short-sighted to assume that the TO is the entity who would coordinate this work; there may be situations where a Transmission Planner performs this work and is best suited to share the information with neighboring system owners/planners as well as the Planning Coordinator.

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Regional Variance:

Comments: Aware of none

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments: Aware of none

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Comments: none

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1. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments: Incorporating assessments by subject matter experts such as this NERC SPCTF / Planning Committee assessment into the NERC Standards revision SAR project is an efficient way to supplement project SARs and allows for valuable input at the front-end of the standards process.

Attachments A and C are not included in the SAR and Attachment B is identified as "Supporting Material". It may be clearer to include all applicable documents within the SAR including including relevant excerpts from any FERC assessmentss and requested changes to the standard.

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: This question may be better addressed as the standard is drafted.

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments:

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Comments: The Drafting team should coordinate any system protection terminology introduced or re-defined within this standard with other system protection related SARs (i.e. Disturbance monitoring, System Protection Maintenance and Testing) to ensure common terminology is appropriately defined in the standards glossary.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
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E-mail:	champagne.roger.2@hydro.qc.ca	
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 and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" 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 and Regional Entities

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

Background Information

This SAR proposes to improve and expand upon the requirements in PRC-001 — System Protection Coordination. Note that some of the requirements in PRC-001 involve real-time control actions taken by entities other than the facility owners, and these requirements may be moved from PRC-001 into Project 2006-06 — Reliability Coordination.

The SAR proposes to address the FERC directives in Order 693 and to address a number of technical shortcomings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the “Standard Review Guidelines.”

Please review the SAR and then answer the questions on the following page. Please e-mail your comments on this form to sarcomm@nerc.net with the subject “Protection Maintenance SAR” by **July 10, 2007**.

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: recommend that Transmission Planners be added

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments: No Regional Variance

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments: No Business Practice

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: none

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: It is not clear based on the information presented how all the functional entities are involved. As an example, no reference is noted in the documents for PC responsibility. Is it inferred that if a coordination model is developed on a wide area basis, the PC will be the responsible entity?

Functional Model entity definitions, tasks, and obligations must be followed while developing applicability of the requirements.

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments:

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments:

The IESO commends NERC, the SDT and the SPCTF (White Paper) for providing clarifications and improvements in the system protection areas.

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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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
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Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: It is not clear based on the information presented if all the functional entities involved are identified in the scope of the standard. As an example, no reference is noted in the documents for TP responsibility. It is inferred that if a coordination model is developed on a wide area basis, the PC will be the only responsible entity. However there may be requirements for the TP as well.

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments:

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

1. The SRC commends NERC, the SDT and the SPCTF for providing this clarification and improvements in the system protection areas.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Walter Marusenko	
Organization:	Manitoba Hydro	
Telephone:	204-487-5407	
E-mail:	wmarusenko@hydro.mb.ca	
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 and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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 improve the requirements in this standard?

Yes

No

Comments: No comments.

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments: No comments.

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: No comments

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: None.

Comments: No variance necessary.

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: None.

Comments: No comments.

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: No comments.

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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 and 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 and Regional Entities

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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

Group Name: Midwest Reliability Organization (MRO)
Lead Contact: Joe Knight
Contact Organization: MRO for Group (GRE - for lead contact)
Contact Segment: 10
Contact Telephone: 763.241.5633
Contact E-mail: jknight@greenergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPS	MRO	10
Terry Bilke	MISO	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Jim Haigh	WAPA	MRO	10
Tom Mielnik	MEC	MRO	10
Pam Oreschnick	XEL	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
MIke Brytowski, Secretary	MRO	MRO	10
28 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. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: None

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: None

Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments:

1. The MRO commends NERC and the SDT for taking the necessary steps to remove the vagueness and ambiguity in the requirements; as well as the need to have clarity and measurability now that the industry has transitioned to mandatory and enforceable standards.

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

2. The SPCTF Assessment of PRC-001-1 did not mention how they would address "Corrective Actions" listed in R2. The MRO requests that the SDT expand on what the scope of these "Corrective Actions" is meant to be (e.g. real-time, or after the fact repair or replacement of defective equipment).

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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
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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1. Do you agree that there is a reliability-related need to improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments: N/A

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments: N/A

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: N/A

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Gentry	
Organization:	Salt River Project	
Telephone:	602-236-6408	
E-mail:	Mike.Gentry@srpnet.com	
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 and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments:

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance:

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice:

Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: I am concerned with the language proposed by FERC and the comparison to reactions to IROL's. Will FERC's requirement apply to a single protection system that has a redundant protection system? Will FERC's requirement apply to a system that is in an "overexposed" state? Will FERC's requirement apply to a system that may be exposed to slow 30 cycle of less tripping. These conditions must be identified in detail

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

as to what will need to meet the "returning the system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes." FERC requirement

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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(Complete this page for comments from one organization or individual.)		
Name:		
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E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
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Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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

Group Name: SERC EC Protection & Control Subcommittee (PCS)

Lead Contact: Jay Farrington

Contact Organization: Alabama Electric Cooperative, Inc.

Contact Segment: 1

Contact Telephone: (334) 427-3225

Contact E-mail: jay.farrington@powersouth.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Robert Rauschenbach	Ameren	SERC	1
Charlie Fink	Entergy	SERC	1
Jammie Lee	Entergy	SERC	1
Tom Seeley	E.ON-U.S.	SERC	1
Steve Waldrep	Georgia Power Company	SERC	1
Hong-Ming Shuh	Georgia Transmission Corporation	SERC	1
Neal Jones	Georgia Transmission Corporation	SERC	1
Jerry Blackley	Progress Energy Carolinas	SERC	1
Pat Huntley	SERC Reliability Corp.	SERC	10
Marion Frick	South Carolina Electric & Gas Co.	SERC	1
Bridget Coffman	South Carolina Public Service Authority	SERC	1
George Pitts	Tennessee Valley Authority	SERC	1
Meyer Kao	Tennessee Valley Authority	SERC	1
Phil Winston	Georgia Power Company	SERC	1
Ernesto Paon	Municipal Electric Authority of Georgia	SERC	1

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

*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.

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

Background Information

This SAR proposes to improve and expand upon the requirements in PRC-001 — System Protection Coordination. Note that some of the requirements in PRC-001 involve real-time control actions taken by entities other than the facility owners, and these requirements may be moved from PRC-001 into Project 2006-06 — Reliability Coordination.

The SAR proposes to address the FERC directives in Order 693 and to address a number of technical shortcomings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the “Standard Review Guidelines.”

Please review the SAR and then answer the questions on the following page. Please e-mail your comments on this form to sarcomm@nerc.net with the subject “Protection Maintenance SAR” by **July 10, 2007**.

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

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 improve the requirements in this standard?

Yes

No

Comments:

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments: Consideration should be given to splitting this effort among 2 or 3 standards to address the operating, operations planning, and planning horizons. Consideration should also be given to moving the operating training requirements to another standard (if not already covered by an existing standard).

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: The requirements for the PC, TO, GO, and DP (planning horizon) should be in a separate standard than those for the RC, BA, TOP, and GOP (operating and operations planning horizons).

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: none

Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: none

Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

Comments: none

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

Please use this form to submit comments on the proposed SAR for Project 2007-06 — System Protection Coordination. Comments must be submitted by **July 10, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "System Protection" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net or by telephone at 609-452-8060.

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 and 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 and Regional Entities

Comment Form — First Draft of SAR for Project 2007-06 — System Protection Coordination

Background Information

This SAR proposes to improve and expand upon the requirements in PRC-001 — System Protection Coordination. Note that some of the requirements in PRC-001 involve real-time control actions taken by entities other than the facility owners, and these requirements may be moved from PRC-001 into Project 2006-06 — Reliability Coordination.

The SAR proposes to address the FERC directives in Order 693 and to address a number of technical shortcomings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the “Standard Review Guidelines.”

Please review the SAR and then answer the questions on the following page. Please e-mail your comments on this form to sarcomm@nerc.net with the subject “Protection Maintenance SAR” by **July 10, 2007**.

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 improve the requirements in this standard?

Yes

No

Comments: We agree that there is a need to improve the requirements of Standard PRC-001-0 and Standard MOD-011-0 as described in the supplemental document "NERC SPCTF Assessment of Standard PRC-001-0 – System Protection Coordination". It is important to modify ambiguous statements such as "...corrective action needs to be taken..." and "must be done...as soon as possible...". By making the improvements described in the SAR, the standard will provide the applicable entities with more definitive requirements that will allow entities to provide specific responsibilities to internal work groups within the standard utility organization.

2. Do you agree with the proposed scope of this SAR?

Yes

No

Comments: Another important change described in this SAR is the requirement to have an up-to-date accurate model of the transmission system for protection studies. It is extremely important to develop these accurate models to allow enhance the reliability of the bulk-electric system. There are efforts underway in the southwest that apply directly to the development of this type of model by late 2007.

3. Do you agree with the applicability of the proposed SAR (Reliability Coordinators, Balancing Authorities, Planning Coordinators, Transmission Operators, Transmission Owners, Generator Owners, Generator Operators and Distribution Providers)?

Yes

No

Comments: We agree that the applicable entities for this standard be modified to include the various "Owner" entities as described in the NERC Functional Model Version 3.

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: N/A

Comments: Not aware of any Regional Variance requirements

**Comment Form — First Draft of SAR for Project 2007-06 — System Protection
Coordination**

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

Business Practice: N/A

Comments: Not aware of any Business Practice needs

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

Comments: N/A