

# Survey Report

## Survey Details

**Name** 2015-09 Establish and Communicate System Operating Limits SAR

**Description**

**Start Date** 8/20/2015

**End Date** 9/21/2015

**Associated Ballots**

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### Survey Questions

***1. Do you agree with the proposed scope for Project 2015-09 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.***

**Yes**

**No**

***2. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:***

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### Responses By Question

***1. Do you agree with the proposed scope for Project 2015-09 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.***

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

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

**Group Information**

Group Name: Dominion NCP

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

**Voter Information**

**Voter** Louis Slade **Segment** 6

**Entity** Dominion - Dominion Resources, Inc. **Region(s)**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** Yes

**Answer Comment:**

**We generally concur with the proposed scope, but have a couple of specific comments on FAC-011 and FAC-014. Please see our comments under Q2, below.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC**

**Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Robert Schaffeld	Southern Company Services, Inc..	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

**Voter Information**

**Voter**

Randall Hubbard

**Segment**

1,3,5,6

**Entity**

Southern Company - Southern Company Services, Inc.

**Region(s)**

FRCC,WECC,TRE,SERC

**Selected Answer:** Yes

**Answer Comment:**

*The SAR descriptive sections do not indicate why the GO and GOP entities are checked in the applicability section. The SOL and IROL topics generally do not involve those entities. The SAR authors should provide a clear rationale for including the GO and GOP functions.*

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** No

**Answer Comment:**

ATC believes that the retirement of FAC-010 R1 and R4 would create partial reliability gaps for the four types of SOLs – Facility Ratings, Voltage Limits, Transient Stability Limits and Voltage Stability Limits. Therefore, ATC proposes the following revisions to the SAR:

- ATC recommends to replace “Propose retirement of FAC-010-3” item with “Propose to move the requirements of FAC-014-2 to FAC-010-4 and FAC-011-4 ; and retire FAC-014-2” in the SAR Detailed Description.
- To clarify applicability of the FAC- Standards requirements, ATC recommends to move all of the planning horizon SOL requirements from FAC-014-2 to a new FAC-010-4 standard and all of the operating horizon requirements from FAC-014-2 to a new FAC-011-4 standard, and retire the FAC-014-2 standard rather than retire FAC-010-3. Operating horizon SOLs and planning horizon SOLs should be separated because they involve different functional entities and have different reliability risks. The SAR does not propose to discontinue the mixing of operating horizon and planning horizon requirements in the same FAC-014-2 standard or to discontinue mixing planning and operating horizon requirements within the same Requirement R5.

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** No

**Answer Comment:**

As described previously in Texas RE's comments on the periodic review (2015-03), Texas RE does not agree with the retirement of FAC-010-3 because TPL-001-4 as it currently stands is an incomplete and insufficient replacement for the planning horizon (both near and long-term). Indeed, TPL-001-4 says nothing specific about operating limits other than to characterize them as vague concepts such as "applicable" or "acceptable." Requirements for entities to develop documented methodologies for planning horizon operating limits are essential for the following reasons.

If FAC-010 is eliminated, there would be no requirement to create a methodology to be used in TPL-001-4. Without a methodology indicating expectations, an entity might not know if it had and SOL or IROL or if it exceeded and SOL or IROL. Without a methodology that supports what an SOL or IROL is, planners would not be able to coordinate efforts and could lead to inconsistent planning. If entities do not have consistent limits and know how the limits are derived, it would not be able to adequately plan well enough for operations and for the future. Limits might be arbitrarily decided upon and inconsistent. From a reliability and compliance perspective, issues are less likely to occur if entities have a plan. Additionally, without a requirement to have a SOL Methodology, entities may not be prepared for an event and thus run the risk of losing all the load in an area instead of some of the load in the area. Texas RE agrees that some SOLs are determined in the real-time or near real-time, but some SOLs are also determined in the planning horizon. If FAC-010 were eliminated, entities might not determine SOLs in the planning horizon.

Rather than retiring FAC-010, Texas RE recommends the drafting team consider combining FAC-010 and FAC-011 into a single standard. The process or methodology to determine SOLs should be the same for both the operations and planning horizon. Obviously, the actual limit for a specific element used in an assessment may be different between the operations and planning horizons, but the methodology on how the limit is determined should be consistent between planning and operations. This approach has worked in our region, as ERCOT, acting as both the RC and PC, issued a combined FAC methodology document that covers both the operations and planning horizons.

Texas RE does not agree with the reasoning for a SAR. The SAR is claims to promote consistency and lessen confusion but it is unclear why “consistency” in “acceptable system performance requirements” discussed in FAC-011 R2 between Interconnections or even Regions would improve reliability. A uniform list of performance requirements is useful in numerous ways, however, it would be very difficult to capture every risk to reliability in each RC area. Uniformity in BES implementation does not exist between and often within different regions.

Texas RE also does not agree that the existing requirements and the SOL definition contribute to confusion and a lack of continent-wide consistency as previously stated by the Periodic Review Team (PRT). Texas RE is not aware of instances where the existing requirements have contributed to confusion or a lack of consistency.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** No

**Answer Comment:**

We propose a wording change to the "Purpose" statement. Delete the words "planning and" from the statement because the focus of this SAR should be to cover the determination and communications of System Operating Limits (SOLs) in the real-time operations time horizon.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

BPA agrees with the scope of the SAR to retire FAC-010.

BPA has no comments on FAC-011.

BPA suggests that the scope of FAC-014 needs to be clarified. Is the main goal for communication of IROL information?

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

## Group Information

Group Name: NPCC--Project 2015-09 Establish and Communicate SOLs - FAC-010-3, FAC-011-3, FAC-014-2

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Robert Pellegrini	The United Illuminating Company	NPCC	1
Kathleen Goodman	ISO - New England	NPCC	2
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1

Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

**Selected Answer:** No

**Answer Comment:**

Suggest a revision to the "Purpose" statement. Delete the words "planning and" from the statement because the focus of this SAR should be to cover the determination and communications of System Operating Limits (SOLs) in the Real-time operations time horizon.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Tammy Porter - Oncor Electric Delivery - 1 - TRE**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool	SPP	2
Jason Smith	Southwest Power Pool	SPP	2
Allan George	Sunflower Electric Power Corporation	SPP	1
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Jonathan Hayes	Southwest Power Pool	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5

James Nail	City of Independence, Missouri	SPP	3,5
Ron Gunderson	Nebraska Public Power District	MRO	1,3,5
Brandon Levander	Nebraska Public Power District	MRO	1,3,5
Kevin Giles	Westar Energy	SPP	1,3,5,6
Sing Tay	Oklahom Gas and Electric	SPP	1,3,5,6

**Voter Information**

**Voter** **Segment**

Jason Smith 2

**Entity** **Region(s)**

Southwest Power Pool, Inc. (RTO) SPP

**Selected Answer:** Yes

**Answer Comment:**

We feel like the SAR is a good broad scope and does not seem to over reach in intent.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable**

**Group Information**

Group Name: ACES Standards Collaborators

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Brian Van Gheem	6
<b>Entity</b>	<b>Region(s)</b>
ACES Power Marketing	NA - Not Applicable

**Selected Answer:** Yes

**Answer Comment:**

We agree with the scope of this project, to “revise requirements for determining and communicating System Operating Limits (SOLs) used in the reliable planning and operation of the Bulk Electric System (BES).”

**Document Name:**

**Likes:** 0

**Dislikes:** 0



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

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***2. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:***

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

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

**Group Information**

Group Name: Dominion NCP

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Louis Slade	6

<b>Entity</b>	<b>Region(s)</b>
Dominion - Dominion Resources, Inc.	

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

We would like to reiterate our comments submitted when the PRT posted its initial recommendations in May, 2105 for comment:

a. We do not agree with the proposal to include in R3.3 a list of planning events in TPL-001-4 to be considered in operations. Since the planning studies are performed under a confined set of system conditions, there is no assurance that the power system could be operated to respect a particular planning event under all possible conditions to be encountered in operations.

Furthermore, if a list of multiple events is included in R3.3, then FAC-014-2 R6 would not be required anymore, and the proposal to revise FAC-014-2 indicated suggested changes to R6, but not deletion of R6, thus this proposal is not consistent with the proposed scope of update to R6 in FAC-014-2.

b. We agree with this recommendation to revise the definitions of SOL and IROL. When developing the revised definition to IROL, we suggest the SDT to consider introducing the concept of “impacts on interconnected systems” to distinguish between instability of local nature (SOLs) and instability having a wider area impact (IROLs).

That said, we do not agree with the proposed SOL Exceedance definition. For example, we do not agree with the second bullet which says: “highest available Facility Rating”, which in our view should be the “applicable rating”, which may not be the highest (e.g. 5-minute rating > 15-minute rating, but the applicable rating could be the latter due to available control actions that can be implemented with the 5 and minute time frames). We also disagree with the fifth bullet. An SOL determined based on transient or voltage stability concerns are either a MW flow level on a line or defined interface, or the applicable pre or post-contingency bus voltages. The proposed definition (the bullet) ties the SOL exceedance to stability or voltage performance (not a value or level), which should have been observed in the SOL/IROL calculation state. We suggest the SDT to consider rewording it accordingly.

Document Name:

Likes: 0

Dislikes: 0

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

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC**

**Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Robert Schaffeld	Southern Company Services, Inc..	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

**Voter Information**

**Voter**

Randall Hubbard

**Segment**

1,3,5,6

**Entity**

Southern Company - Southern Company Services, Inc.

**Region(s)**

FRCC,WECC,TRE,SERC

**Selected Answer:**

**Answer Comment:**

See number 1.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:**

**Answer Comment:**

The proposed SAR states that this project "may result in development of one or more proposed Reliability Standards and definitions", yet the SAR Type field only has "Revision to existing Standard" and "Withdrawal of existing Standard" selected. "New Standard" remains un-checked.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1 -**

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:**

**Answer Comment:**

The development of performance requirements for the operations horizon similar to those found in Table 1 of TPL-001-4 could create a burden on the Reliability Coordinator to classify events in real-time to ensure the System meets the performance requirements. This would create an extra layer of complexity for operators, and could hinder their ability to focus on real-time operations.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

On page 3, we suggest revising the sentence “Develop revised or new requirement(s) that facilitate transfer of necessary reliability information between the planning and operating entities for establishing and communicating System Operating Limit.” Please substitute the word “planning” with “owning entities.” Also, please add a clarification, “(i.e., from the TOs, DPs, and GOs to the TOPs).”

The revised sentence should read as follows: “Develop revised or new requirement(s) that facilitate transfer of necessary reliability information between the owning entities and the operating entities (i.e., from TOs, DPs and GOs to the TOPs) for establishing and communicating System Operating Limits.

Operating entities should not go to the planning entity for the basic system descriptive information, such as feeder and equipment ratings. Operating entities should go back to the original responsible source of this information, i.e., the asset owning entity (TO or GO).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:**

**Answer Comment:**

N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

Group Name: NPCC--Project 2015-09 Establish and Communicate SOLs - FAC-010-3, FAC-011-3, FAC-014-2

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Robert Pellegrini	The United Illuminating Company	NPCC	1
Kathleen Goodman	ISO - New England	NPCC	2
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1

Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1

### Voter Information

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

### Selected Answer:

### Answer Comment:

The SAR proposes to retire FAC-010-3 because BES planning is addressed in TPL-001-4. While both standards cover planning, TPL-001-4 does not specifically address SOLs.

Because the severity of facility ratings are time dependent, a definition for operations time horizon needs to be developed. Suggest Operations Time Horizon be defined as the time period it takes to ensure stable system operation following a Real-time Assessment. Specifics can be incorporated in the standard.

On page 3, suggest revising the sentence "Develop revised or new requirement(s) that facilitate transfer of necessary reliability information between the planning and operating entities for establishing and communicating System Operating Limit." Please substitute the word "planning" with "owning entities." Also, please add a clarification, "(i.e., from the TOs, DPs, and GOs to the TOPs)." The revised sentence would then read as follows: "Develop revised or new requirement(s) that facilitate transfer of necessary reliability information between the owning entities and the operating entities (i.e., from TOs, DPs and GOs to the TOPs) for establishing and communicating System Operating Limits.

Operating entities should not go to the planning entity for the basic system descriptive information, such as feeder and equipment ratings. Operating entities should go back to the original responsible source of this information, i.e., the asset owning entity (TO or GO).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

**Selected Answer:**

**Answer Comment:**

The SAR descriptive sections do not indicate why the GO and GOP entities are checked in the applicability section. The SOL and IROL topics generally do not involve those entities. With no additional description of the scope of the revisions to be considered, we suggest the GO and GOP should be removed from the SAR applicability.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Tammy Porter - Oncor Electric Delivery - 1 - TRE**

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

## Group Information

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Jason Smith	Southwest Power Pool	SPP	2
Allan George	Sunflower Electric Power Corporation	SPP	1
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Jonathan Hayes	Southwest Power Pool	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
James Nail	City of Independence, Missouri	SPP	3,5
Ron Gunderson	Nebraska Public Power District	MRO	1,3,5
Brandon Levander	Nebraska Public Power District	MRO	1,3,5
Kevin Giles	Westar Energy	SPP	1,3,5,6
Sing Tay	Oklahom Gas and Electric	SPP	1,3,5,6

## Voter Information

<b>Voter</b>	<b>Segment</b>
Jason Smith	2
<b>Entity</b>	<b>Region(s)</b>
Southwest Power Pool, Inc. (RTO)	SPP

### Selected Answer:

### Answer Comment:

We support a more standardized SOL determination and establishment methodology. A single, continent-wide methodology, or improved definition that results in more consistent SOL philosophy would be welcome.

### Document Name:

Likes: 0

Dislikes: 0

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable**

**Group Information**

Group Name: ACES Standards Collaborators

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Brian Van Gheem	6
<b>Entity</b>	<b>Region(s)</b>
ACES Power Marketing	NA - Not Applicable

**Selected Answer:**

**Answer Comment:**

We believe the wording within the Detailed Description Section of this SAR should be stronger. The SDT should address, not just “consider,” the recommendations of the Project 2015-03 Periodic Review of System Operating Limits SDT, the Independent Experts Review Project (IERP), FERC Directives, and Paragraph 81 concepts. The SDT has an opportunity to address several Paragraph 81 requirements and even the retirement of FAC-010-3, and we feel a consideration of these recommendations doesn’t adequately provide direction to the SDT that industry expects. We recommend changing the word “consider” to “address” to ensure that the drafting team will thoroughly review each item.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0