

Comment Report

Project Name: 2017-05 NUC-001-3 Periodic Review | Preliminary Team Recommendation
Comment Period Start Date: 12/15/2017
Comment Period End Date: 1/29/2018
Associated Ballots:

There were 25 sets of responses, including comments from approximately 80 different people from approximately 57 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. NUC-001-3, Requirement R1 states that “The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt.” For clarification, the PRT recommends that a future revision consider revising “proposed” to “proposed new or revised NPIRs,” as noted above. Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

2. NUC-001-3, Requirement R3 states that “Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system...”

The PRT seeks industry comment on whether or not the planning analyses should be better defined to align with the Glossary of Terms Used in NERC Reliability Standards (e.g., Near-Term Transmission Planning Horizon and/or Long-Term Transmission Planning Horizon). Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

3. Currently, the Time Horizons in NUC-001-3, Requirement R4 are listed as *Operations Planning* and *Real-time Operations*. The PRT contends that while the Time Horizons should also include *Same-day*, it asserts that this observation does not warrant immediate revisions to the Standard. Do you agree with this assertion? If not, please explain your rationale.

4. While the PRT agrees that the following observation does not warrant immediate revisions, it identified a potential new Sub-part for Requirement R9 to clarify that some Transmission Entities may rely on specific Bulk Electric System requirements to support NPLRs and therefore recommends clarification by adding the following new Sub-part:

9.2.4 Any Agreement that includes NPIR(s) proposed by a Nuclear Plant Generator Operator shall also include NPIR(s) based on Bulk Electric System requirements to support the NPLRs if specified by one or more Transmission Entities.

Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

5. The PRT identified a number of potential errata (i.e., administrative) clarifications listed in the NUC-001-3 EPR Template. If you disagree with any of the observations, provide your rationale.

6. The team considered the cost effectiveness of the standard and did not identify a concern related to cost effectiveness as drafted. Do you agree? If not, please provide additional detail.

7. Given the observations detailed in the NUC-001-3 template, the PRT’s preliminary recommendation is to defer the suggested clarifications for later consideration; therefore, developing a draft Standard Authorization Request now is not necessary. Do you agree with the PRT’s assertion that the Reliability Standard: (i) does not need immediate modification through standards development; (ii) is sufficient to protect reliability; and (iii) meets the reliability objective of the standard? If not, please provide your rationale.

8. If you have any other comments on this review that you haven’t already mentioned above, please provide them here.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Brian Van Gheem	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Ginger Mercier	Prairie Power, Inc.	1,3	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Lucia Beal	Southern Maryland Electric Cooperative	3	RF
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Tennessee Valley Authority	Dennis Chastain	1,3,5,6	SERC	Tennessee Valley Authority	DeWayne Scott	Tennessee Valley Authority	1	SERC
					Ian Grant	Tennessee Valley Authority	3	SERC
					Brandy Spraker	Tennessee Valley Authority	5	SERC
					Marjorie Parsons	Tennessee Valley Authority	6	SERC
DTE Energy - Detroit Edison Company	Karie Barczak	3,4,5		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC

					William Shultz	Southern Company Generation	5	SERC
ISO New England, Inc.	Michael Puscas	2		ISO/RTO Council Standards Review Committee (SRC)	Ben Li	Independent Electricity System Operator, Inc.	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Ali Miremadi	California Independent System Operator, Inc.	2	WECC
					Terry Blilke	Midcontinent ISO, Inc.	2	MRO
					Greg Campoli	NYISO	2	NPCC
					Kathleen Goodman	Independent System Operator - New England	2	NPCC
					Mark Holman	PJM Interconnection, L.L.C.	2	RF
					Brandon Gleason	Electric Reliability Council of Texas, Inc.	2	Texas RE
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no HQ and ISO-NE	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC

					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Daniel Grinkevich	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Brian O'Boyle	Con Ed - Consolidated Edison	5	NPCC
					Sean Cavote	PSEG	4	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
PSEG	Sean Cavote	1,3,5,6	FRCC,NPCC,RF	PSEG REs	Tim Kucey	PSEG - PSEG Fossil LLC	5	NPCC
					Karla Barton	PSEG - PSEG	6	RF

						Energy Resources and Trade LLC		
					Jeffrey Mueller	PSEG - Public Service Electric and Gas Co.	3	RF
					Joseph Smith	PSEG - Public Service Electric and Gas Co.	1	RF

1. NUC-001-3, Requirement R1 states that “The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt.” For clarification, the PRT recommends that a future revision consider revising “proposed” to “proposed new or revised NPIRs,” as noted above. Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

The proposed change is an enhancement to the existing Standard Requirement language. Consideration for review as part of the next revision to the Standard is acceptable.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

AEP believes that the proposed revision is unnecessary, as the obligation is sufficiently clear in its current form.

In response to the question posed, AEP has no objection to PRT’s assertion that their observation does not warrant immediate revisions to the Standard.

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

PJM agrees with the PRT's suggested clarification, and agrees that the proposed change does not warrant immediate revision to the standard.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

We concur that the observed "shortfall" does not warrant immediate revisions to the Standard.

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer

Yes

Document Name

Comment

We concur that the observed "shortfall" does not warrant immediate revisions to the Standard, but also question whether such a change is necessary, since the term "proposed NPIRs" is sufficiently broad to include new or revised NPIRs.

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

PSEG agrees that this determination does not warrant immediate revisions to the standard.

Likes 0

Dislikes 0

Response

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer Yes

Document Name

Comment

Reclamation recommends to remove the word “the” preceding “proposed new or revised NPIRs.” The requirement should read, “The Nuclear Plant Generator Operator shall provide proposed new or revised NPIRS in writing to the applicable Transmission Entities...”

Reclamation also recommends R1 be further revised to specify a time frame in which the NPIRs must be provided.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

This does not warrant an immediate revision.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 1,3,6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lauren Price - American Transmission Company, LLC - 1 - MRO,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	

2. NUC-001-3, Requirement R3 states that “Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system...”

The PRT seeks industry comment on whether or not the planning analyses should be better defined to align with the Glossary of Terms Used in NERC Reliability Standards (e.g., Near-Term Transmission Planning Horizon and/or Long-Term Transmission Planning Horizon). Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

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

Answer Yes

Document Name

Comment

We agree with the alignment to defined terms.

Likes 0

Dislikes 0

Response

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer Yes

Document Name

Comment

Reclamation recommends R3 be revised to reference R2 as the source of the Agreements and specify a time frame in which the results of the planning analyses be communicated to Nuclear Plant Generator Operators.

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

PSEG agrees that this determination does not warrant immediate revisions to the standard.

Likes	0
Dislikes	0
Response	
Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
<p>We agree with the PRT's assertion that this observation does not warrant immediate revisions to the Standard. In its response to the technical accuracy of Requirement 3 of NERC Reliability Standard NUC-001-3 (i.e. question 10 of the Periodic Review Template), we believe the PRT should include the terms "Planning Assessment" and "Corrective Action Plan" within its list of applicable terms from the NERC Glossary. Similar references to "Real-time Assessment" and "Operational Planning Analysis" should be incorporated into Requirement R4 at a later date as well.</p>	
Likes	0
Dislikes	0
Response	
Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	Yes
Document Name	
Comment	
<p>We concur that the identified potential "issue" does not warrant immediate revisions to the Standard. Under the existing standard language, responsible entities would simply incorporate the NPIRs into their planning analysis for both near-term and long-term horizon. While it is possible that including the requirement in both of the horizons may not be absolutely needed or applicable for certain entities in every case, there is no reliability gap if planning analyses for both horizons are conducted. Further, to the extent that the concern is that Transmission Entities may be unsure how to apply R3 per the recent updates to the NERC Glossary for the different time horizons, NERC could conduct an anonymous survey to assess whether there is a reliability gap before making any change.</p>	
Likes	0
Dislikes	0
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	

Comment

We suggest keeping the language as is, not adding in this proposed detail. The details of what horizon should be used is up to the NPLRs to determine, not this document.

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

We concur that the identified potential “issue” does not warrant immediate revisions to the Standard. Without the “planning analysis” more clearly specified or defined, responsible entities would simply incorporate the NPIRs into their planning analysis for both near-term and long-term horizon. While either of the horizons may not be absolutely needed or applicable for certain entities, there is no reliability gap if planning analyses for both horizons are conducted.

We suggest deleting the second part of R3, ‘and shall communicate the results of these analyses to the Nuclear Plant Generator Operator’. Communication is not necessary if no impact has been identified during the planning analyses. In practice, this would just be an administrative burden to the applicable entities, with no reliability benefit. If there is an impact, the communication need is covered by Requirement R8.

Alternatively, to cater for cases where the Generator Operator may occasionally need these results, this part could be changed to ‘and shall make the results of these analyses available to the Nuclear Plant Generator Operator.’.

Publicly posting the results can be deemed sufficient without requiring any additional communication.

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

PJM believes that there is some value in the clarification of the planning analyses term used in the standard, although it is likely that in absence of the clarification, most entities would incorporate NPIRs into both near-term and long-term planning analysis. PJM does agree with the PRT's assertion that this proposed change does not warrant immediate revision to the standard.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

AEP believes that the proposed revision is unnecessary, as the obligation is sufficiently clear in its current form.

In response to the question posed, AEP has no objection to PRT's assertion that their observation does not warrant immediate revisions to the Standard.

Likes 0

Dislikes 0

Response

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

Revising the Standard Requirement to better align with the NERC Glossary of Terms time dependent definitions will be a clarification to the Standard.

However, it is Exelon's opinion that this observation does not warrant an immediate revision to the Standard.

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1 - MRO,RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 1,3,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	
Document Name	
Comment	
Texas RE does recommend defining planning analysis or use a term that is defined such as Operations Planning Analysis. Additionally, Texas RE recommends defining “electric system” which is used in both Requirements R3 and R4.	
Likes 0	
Dislikes 0	
Response	

3. Currently, the Time Horizons in NUC-001-3, Requirement R4 are listed as *Operations Planning* and *Real-time Operations*. The PRT contends that while the Time Horizons should also include *Same-day*, it asserts that this observation does not warrant immediate revisions to the Standard. Do you agree with this assertion? If not, please explain your rationale.

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

Revising the Standard Requirement to better align with appropriate Time Horizons will be a clarification to the Standard. However, it is Exelon's opinion that this observation does not warrant an immediate revision to the Standard.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

AEP believes that the proposed revision is unnecessary, as the obligation is sufficiently clear in its current form.

In response to the question posed, AEP has no objection to PRT's assertion that their observation does not warrant immediate revisions to the Standard.

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

PJM agrees with the PRT's suggested inclusion of the "Same-day" Time Horizon for R4, and agrees that the proposed change does not warrant immediate revision to the standard.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

We concur that the observed exclusion of “Same-day” in the Time Horizon does not warrant immediate revisions to the standard. Part 4.1 stipulates that the Responsible Entities incorporate the NPIRs into their operating analyses, which is deemed adequate to cover the same day time frame.

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Duke Energy agrees that this observation does not warrant immediate revisions to the Standard. We agree that this clarification is needed if *Same day* is currently used and understood throughout the industry. That said, it does not appear that Same day (or Operations Planning) is included in the NERC Glossary of Terms. We would recommend that some consideration be given to creating definitions for these in the NERC Glossary of Terms.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

We concur that the observed exclusion of “Same-day” in the Time Horizon does not warrant revisions to the standard—immediate or otherwise. Part 4.1 stipulates that the Responsible Entities incorporate the NPIRs into their operating analyses, which is deemed adequate to cover the same-day time frame.

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

PSEG agrees that this determination does not warrant immediate revisions to the standard.

Likes 0

Dislikes 0

Response

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer Yes

Document Name

Comment

Reclamation agrees that the addition of Same-day to the R4 Time Horizons does not warrant immediate revisions to the Standard because the minimum Time Horizon is already covered by the inclusion of Real-time Operations.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

This does not warrant an immediate revision.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**David Jendras - Ameren - Ameren Services - 1,3,6****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lauren Price - American Transmission Company, LLC - 1 - MRO,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. While the PRT agrees that the following observation does not warrant immediate revisions, it identified a potential new Sub-part for Requirement R9 to clarify that some Transmission Entities may rely on specific Bulk Electric System requirements to support NPLRs and therefore recommends clarification by adding the following new Sub-part:

9.2.4 Any Agreement that includes NPIR(s) proposed by a Nuclear Plant Generator Operator shall also include NPIR(s) based on Bulk Electric System requirements to support the NPLRs if specified by one or more Transmission Entities.

Do you agree with the PRT's assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer No

Document Name

Comment

Reclamation asserts the PRT has identified a gap in the standard created by the absence of R9.2.4. Since the current standard does not require that NPIRs based on Bulk Electric System requirements be included in Agreements to address and implement NIPRs, Reclamation recommends this requirement be immediately added to the standard to fill the gap.

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

PSEG agrees that this determination does not warrant immediate revisions to the standard.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

We concur that the observed potential “gap” does not warrant immediate revisions to the standard.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Duke Energy agrees with the PRT that this observation does not warrant immediate revision to the Standard. It is unclear, whether this potential revision is needed at all. Would this revision prompt an entity to create a list with all of the elements that include BES requirements that support an NPLR?

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

We concur that the observed potential “gap” does not warrant immediate revisions to the standard.

In fact, we do not believe there is a need to add the proposed sub-part since by definition, NPIR already includes those “....requirements based on Bulk Electric System requirements that have been mutually agreed to by the Nuclear Plant Generator Operator and the applicable Transmission Entities.” The proposed 9.2.4 will thus be redundant with what is already included in the definition for development “...Agreement that include mutually agreed to NPIRs” per R2.

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer

Yes

Document Name

Comment

PJM agrees with the assertion that the proposed change does not warrant immediate revision to the standard. Regarding the change, PJM believes that there is merit to the clarification that NPIRs may include BES requirements identified by Transmission Entities, given that R1 states that NPGOs (not the Transmission Entities) provide the NPIRs.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer

Yes

Document Name

Comment

AEP has no objection to possibly pursuing the Sub-part as suggested above.

In response to the question posed, AEP has no objection to PRT’s assertion that their observation does not warrant immediate revisions to the Standard.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name	
Comment	
BPA believes that the proposed sub-part 9.2.4 needs more clarification, and potentially may be unnecessary. BPA believes that the agreement that includes NPIR requirements could be more stringent than the BES requirement. Some nuclear plants may require the Transmission Entity to maintain unusually high voltage at their primary station service bus to enable the plant operator to shutdown safely during Loss of Coolant Accident. The BES requirement (planning standards) allows the Transmission Entity to develop acceptable voltage criteria which may be lower than the required voltage level by the plant operator. Therefore, adding this sub-part would make it confusing and unnecessary.	
Likes	0
Dislikes	0
Response	
Ruth Miller - Exelon - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Exelon agrees that the addition of a new Sub-part for Requirement R9 will, for some Transmission Entities, be a needed clarification to the Standard. However, it is Exelon's opinion that this observation does not warrant an immediate revision to the Standard.	
Likes	0
Dislikes	0
Response	
Lauren Price - American Transmission Company, LLC - 1 - MRO,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no HQ and ISO-NE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

In order to be consistent with other Reliability Standards, Texas RE recommends using the term "Responsible Entities" rather than "Transmission Entities" in section A4.2.

Likes 0

Dislikes 0

Response

5. The PRT identified a number of potential errata (i.e., administrative) clarifications listed in the NUC-001-3 EPR Template. If you disagree with any of the observations, provide your rationale.

Leonard Kula - Independent Electricity System Operator - 2

Answer No

Document Name

Comment

From the EPR Template, we are unable to make out which errata have been identified. If the PRT is referring to the removal of LSE from the Applicability Section (Item 11. Functional Model), then we concur.

At any rate, we agree that errata do not need to be corrected at this time.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer No

Document Name

Comment

To conform to other NERC Reliability Standards, we believe this standard should use the reference "Responsible Entity" as the applicable functional entity instead of "Transmission Entity". This reference should also be identified within the standard's applicability section as any functional entity that has been assigned a responsibility to provide service through a Nuclear Plant Interface Requirement.

Likes 0

Dislikes 0

Response

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

Exelon agrees with the potential errata changes identified by the PRT.

Likes	0
Dislikes	0
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA agrees with the observations	
Likes	0
Dislikes	0
Response	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM agrees with the administrative errata corrections such as the consistent terminology usage for “applicable entities” in the NUC-001 VSL section. PJM concurs that these errata corrections do not warrant immediate revision to the standard.	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no HQ and ISO-NE	
Answer	Yes
Document Name	
Comment	
We agree as long as the errata changes do not include the following from the EPR Template: “The locally defined term “Transmission Entity” within the Reliability Standard should be re-examined.” We do not believe the term needs to be re-examined; changes to this term may result in the need to revise Agreements which would not be a productive exercise for entities to be forced to undertake.	

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer

Yes

Document Name

Comment

From the EPR Template, we are unable to make out which errata have been identified. If the PRT is referring to the removal of LSE from the Applicability Section (Item 11. Functional Model), then we concur.

At any rate, we agree that errata do not need to be corrected at this time.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

While the review team identified several changes that could be made to this standard, it is not clear whether the review team considers these changes errata changes or opportunities for future revisions. Texas RE requests a list of the specific errata changes the review team identified.

Likes 0

Dislikes 0

Response

6. The team considered the cost effectiveness of the standard and did not identify a concern related to cost effectiveness as drafted. Do you agree? If not, please provide additional detail.

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

There is some administrative cost with the standard so some may have a different definition of cost effectiveness

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

PJM agrees that there are no concerns with the cost effectiveness of the standard as drafted.

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1 - MRO,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 1,3,6

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Richard Vine - Richard Vine - 2	
Answer	
Document Name	
Comment	

No Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Document Name

Comment

We neither agree nor disagree since the PRT only indicates that “The Reliability Standard as written allows flexibility in implementation for merchant power plants and vertically-integrated utilities”, which we do not assess to be a cost-effectiveness assessment of various alternatives that could meet the intent or objective of the standard.

Likes 0

Dislikes 0

Response

7. Given the observations detailed in the NUC-001-3 template, the PRT's preliminary recommendation is to defer the suggested clarifications for later consideration; therefore, developing a draft Standard Authorization Request now is not necessary. Do you agree with the PRT's assertion that the Reliability Standard: (i) does not need immediate modification through standards development; (ii) is sufficient to protect reliability; and (iii) meets the reliability objective of the standard? If not, please provide your rationale.

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer No

Document Name

Comment

Reclamation recommends the standard be immediately revised to include the proposed requirement R9.2.4. See the response to Question 4.

Likes 0

Dislikes 0

Response

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

Exelon agrees that the suggested clarifications will be improvements to the Standard but also agrees with deferring the changes to a future revision.

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

PJM agrees with the PRT's assertion that the suggested clarifications be deferred for later consideration as there are no identified reliability gaps.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

We agree with this assessment and proposal.

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

We agree with this assessment, although we do not believe that any of the proposed revisions are necessary or appropriate, with the exception of the removal of the LSE function from the Applicability section, as noted above in response to Question 5.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 1,3,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no HQ and ISO-NE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1 - MRO,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
<p>The SAR for Project 2017-07 Standards Alignment with Registration suggests that LSE function may be removed through periodic review instead of the standards alignment project. Since the periodic review team elected to not revise Reliability Standard NUC-001-3 at this time, Texas RE wants to ensure that the Registration Alignment changes will be made under project 2017-07.</p>	
Likes 0	
Dislikes 0	
Response	

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

Lauren Price - American Transmission Company, LLC - 1 - MRO,RF

Answer

Document Name

Comment

The GO provides NPIRs to the TE. The NPIRs are then included in one or more agreements between the GO & the TE. Those agreements are used as Measures to indicated compliance with NUC-001-3 Requirements 3,4,5,6,7,8 & 9. Listing the NPIRs separately in **Requirement 1** is redundant to the evidence provided for Requirements 3 through 9. Requirements R1 & R2 could be consolidated into R3 and then referred to in subsequent Requirements.

Also, The GO provides NPIRs to the TE. The NPIRs are then included in one or more agreements between the GO & the TE. Those agreements are used as Measures to indicated compliance with NUC-001-3 Requirements 3,4,5,6,7,8 & 9. Listing the Agreement(s) separately in **Requirement 2** is redundant to the evidence provided for Requirements 3 through 9. Requirements R1 & R2 could be consolidated into R3 and then referred to in subsequent Requirements.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Brian Van Gheem - 6, Group Name ACES Standards Collaborators

Answer

Document Name

Comment

We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer

Document Name

Comment

Notwithstanding the above general concurrence, we are curious as to why this standard is being put through a periodic review given that

NUC-001-3 has been in place for less than 2 years and not even through a single audit cycle. The Rules of Procedure indicate that standards only need to be reviewed once every 10 years.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not necessarily disagree with the review team's assertion that these changes are not warranted at this time. Texas RE does, however, request technical justification for not making the changes at this time.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No other comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No changes are recommended for Section D (Regional Variances) of the NERC standard NUC-001-3 as it is still applicable to Canadian (CANDU)

Nuclear Power Plants.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy agrees with the assertion made by the PRT in the Periodic Review Template, that the term "Transmission Entities" should be considered for revision in the future. The term Transmission Entities could be viewed as ambiguous, and clarity of the standard could be improved with further explanation of this term.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

In the standard in Requirement7 and M7 as well as R8 and M8 in the sentence that ends with "***electric system to meet the NPIRs***", we suggest you add, right after NPIRs, "***or the Nuclear Plant Generator Operators ability to operate the plant to meet the NIPRs.***"

The way it's currently written it implies that it is always incumbent on the system to make the changes to meet the NPIRs whether the plant or the TO/TOP needs to make a change. That is most problematic if the plant decides to make changes, operational or design, that will result in needing to change the NPIRs or how either party operates. The way it is stated it seems that the system is left unable to meet the NPIRs when, in fact, the plant could operate differently to meet the NPIRs following the change. **Example:** A plant has declared they will no longer open a circuit switcher to accommodate an outage of plant downstream equipment. This would constitute an operational change for the plant since the switcher has been there since the plant came online and has always been the preferred method to clear their transformer(s). The next outage would cause the TOP to need to take a bus outage for a plant transformer outage. The same thing could happen if the plant decided they didn't want to pay for a repair of their SVCs. They could just say they are not going to use SVCs. The way NUC is currently written, the TOP would not have the ability to operate the electric system to meet the NPIRs.

The addition of the language mentioned above could clarify that it is anticipated that the plant can **also** make a change to be able to meet the NPIR.

Likes 0

Dislikes 0

Response

Richard Vine - Richard Vine - 2

Answer

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer

Document Name

Comment

There may be opportunity to provide greater clarity regarding exactly which situations drive the NPIR's applicability. For example, the NPIR needs to clearly define the individual unit status, load requirements of the plant, and the configuration of the low side reactive control in addition to defining the high side of the plant requirements.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

no

Likes 0

Dislikes 0

Response

Ruth Miller - Exelon - 1,3,5,6

Answer

Document Name

Comment

Exelon supports and endorses the findings of the NUC-001-3 EPR team and has no additional comments.

Likes 0

Dislikes 0

Response

Becky Webb - Exelon - 1,3,5,6

Answer	
Document Name	
Comment	
Exelon MKT Segment 6 supports and endorses the findings of the NUC-001-3 EPR team and has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Chris Scanlon - Exelon - 1,3,5,6	
Answer	
Document Name	
Comment	
Exelon TO Segment 1 supports and endorses the findings of the NUC-001-3 EPR team and the comments of Exelon Generation. We have no additional comments.	
Likes 0	
Dislikes 0	
Response	
John Bee - Exelon - 1,3,5,6	
Answer	
Document Name	
Comment	
Exelon Segment 3 representative supports the commnets filed by Exelon Generation.	
Likes 0	
Dislikes 0	
Response	