

Consideration of Comments

Project 2015-04: Alignment of Terms

The Project 2015-04 drafting team thanks all commenters who submitted comments on the SAR. The SAR was posted for a 30-day formal comment period from March 13, 2015 through April 13, 2015. Stakeholders were asked to provide feedback on the SAR through a special electronic comment form.

All comments submitted may be reviewed in their original format on the 2015-04 [project page](#).

If you feel that your comment has been overlooked or if you feel that the substance of your comment was not addressed, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Senior Director of Standards, Valerie Agnew, at 404-446-2566 or at valerie.agnew@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual, which can be accessed by clicking [here](#).

1. The SAR provides that the “Industry Need” for the project is as follows: “There are defined terms that appear in both the NERC Glossary of Terms and Rules of Procedure (“cross-over terms”) that are inconsistent in substance and form. This causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and Rules of Procedure.” Do you agree with the stated “Industry Need” as outlined in the SAR? If not, please identify what you believe the proper statement of “Industry Need” to be.9

2. The SAR provides that the purpose of the project is, “to align the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”
Do you agree with the purpose statement for the project? If not, please explain the basis for your disagreement and provide a recommended purpose statement for the project.15

3. The SAR identifies two goals for the project as follows:
Goal 1: For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP. Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.
Do you agree with the stated goals for the project? If not, please identify which goal(s) you do not agree with and provide a detailed description of your recommended goals for the project.....21

4. The stated objectives for the project are as follows: (1.) For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval. (2.) For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval. (3.) For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding

changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned. Do you agree with these stated objectives? If you do not agree, please explain the basis for your disagreement and provide a detailed description of your recommended objectives for the project. 27

5. The “Detailed Description” section of the SAR provides a non-exhaustive, illustrative listing of the types of work that will be undertaken by the drafting team. Do you agree with the “Detailed Description” section of the SAR? If you do not agree with the description of the work that will be undertaken by the drafting team, please state the basis for your disagreement and provide a detailed description of what work you believe should be undertaken.34

6. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:42

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
ACES Power Marketing	6		ACES Standards Collaborators	Amber Skillern	East Kentucky Power Cooperative	SERC	1,3,5
				Ginger Mercier	Prairie Power, Inc.	SERC	3
				Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
				Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
				Bill Watson	Old Dominion Electric Cooperative	RFC	3,4
				Chip Koloini	Golden Spread Electric Cooperative	SPP	3,5
				Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
				Mohan Sachdeva	Buckeye Power, Inc.	RFC	3,4,5
				Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
	6			Mike Garton	NERC Compliance Policy	NPCC	5,6

Dominion - Dominion Resources, Inc.			Dominion NCP	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
Independent Electricity System Operator	2	NPCC	ISO/RTO Council Standards Review Committee	Charles Yeung	SPP	SPP	2
				Christina Bigelow	ERCOT	TRE	
				Mark Holman	PJM	RFC	
				Greg Campoli	NYISO	NPCC	
				Ali Miremadi	CAISO	WECC	
				Ben Li	IESO	NPCC	
				Kathleen Goodman	ISO-NE	NPCC	
Duke Energy	1,3,5,6	FRCC, SERC, RFC	Mike Lowman on Behalf of Duke Energy	Doug Hils	Duke Energy	RFC	1
				Lee Schuster		FRCC	3
				Dale Goodwine		SERC	5
				Greg Cecil		RFC	6
MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
				Amy Casucelli	Xcel Energy		1,3,5,6
				Chuck Lawrence	American Transmission Company		1
				Chuck Wicklund	Otter Tail Power Company		1,3,5
				Dan Inman	Minnkota Power Cooperative, Inc		1,3,5,6
				Dave Rudolph	Basin Electric Power Cooperative		1,3,5,6
				Kayleigh Wilkerson	Lincoln Electric System		1,3,5,6
				Jodi Jenson	Western Area Power Administration		1,6
				Larry Heckert	Alliant Energy		4
				Mahmood Safi	Omaha Public Utility District		1,3,5,6
				Marie Knox	Midwest ISO Inc.		2

				Mike Brytowski	Great River Energy		1,3,5,6
				Randi Nyholm	Minnesota Power		1,5
				Scott Nickels	Rochester Public Utilities		4
				Terry Harbour	MidAmerican Energy Company		1,3,5,6
				Tom Breene	Wisconsin Public Service Corporation		3,4,5,6
				Tony Eddleman	Nebraska Public Power District		1,3,5
Northeast Power Coordinating Council	10	NPCC	NPCC--RSC--2014-04	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
				David Burke	Orange and Rockland Utilities Inc.		3
				Greg Campoli	New York Independent System Operator		2
				Sylvain Clermont	Hydro-Quebec TransEnergie		1
				Kelly Dash	Consolidated Edison Co. of New York, Inc.		1
				Gerry Dunbar	Northeast Power Coordinating Council		10
				Kathleen Goodman	ISO - New England		2
				Mark Kenny	Northeast Utilities		1
				Helen Lainis	Independent Electricity System Operator		2
				Alan MacNaughton	New Brunswick Power Corporation		9
				Paul Malozewski	Hydro One Networks Inc.		1
				Bruce Metruck	New York Power Authority		6
				Lee Pedowicz	Northeast Power Coordinating Council		10

				Robert Pellegrini	The United Illuminating Company		1
				Si Truc Phan	Hydro-Quebec TransEnergie		1
				David Ramkalawan	Ontario Power Generation, Inc.		5
				Brian Robinson	Utility Services		8
				Wayne Sipperly	New York Power Authority		5
				Ben Wu	Orange and Rockland Utilities Inc.		1
				Peter Yost	Consolidated Edison Co. of New York, Inc.		3
				Michael Jones	National Grid		1
				Brian Shanahan	National Grid		1
				Connie Lowe	Dominion Resources Services, Inc.		5
				Silvia Parada Mitchell	NextEra Energy, LLC		5
Public Service Enterprise Group	1,3,5,6	NPCC, RFC	PSEG	Tim Kucey	PSEG - PSEG Fossil LLC	RFC	5
				Stephen York	PSEG - Energy Resources and Trade LLC		6
				Joseph Smith	PSEG - Public Service Electric and Gas Co.		1
				Jeffrey Mueller	PSEG - Public Service Electric and Gas Co		3
Southern Company - Southern Company Services, Inc.	1,3,5,6	SERC	Southern Company	Robert Schaffeld	Southern Company Services, Inc..	SERC	1
				John Ciza	Southern Company Generation and Energy Marketing		6
				R. Scott Moore	Alabama Power Company		3
				William Shultz	Southern Company Generation		5

Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	SPP	2
				Laura Cox	Westar Energy Inc		1,3,5,6
				Stephanie Johnson	Westar Energy Inc		1,3,5,6
				Bo Jones	Westar Energy Inc		1,3,5,6
				Tiffany Lake	Westar Energy Inc		1,3,5,6
				Kevin Giles	Westar Energy Inc		1,3,5,6
				James Nail	City of Independence, Missouri		3,5
				Ellen Watkins	Sunflower Electric Power Corporation		1
				Jason Smith	Southwest Power Pool Inc		2
				Megan Wagner	Westar Energy Inc		1,3,5,6
				Luis Zaragoza	Sunflower Electric Power Corporation		1
				J.Scott Williams	City Utilities of Springfield		1,4

1. The SAR provides that the “Industry Need” for the project is as follows:

“There are defined terms that appear in both the NERC Glossary of Terms and Rules of Procedure (“cross-over terms”) that are inconsistent in substance and form. This causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and Rules of Procedure.”

Do you agree with the stated “Industry Need” as outlined in the SAR? If not, please identify what you believe the proper statement of “Industry Need” to be.

#	Commenter/ Organization	Y/N	Question 1 Comment	Drafting Team Response
1	Jeremy Voll - Basin Electric Power Cooperative			
2	Charles Yeung - Southwest Power Pool, Inc. (RTO)	Yes		Thank you for your support.
3	John Fontenot – Bryan Texas Utilities	Yes		Thank you for your support.
4	Dennis Minton – Florida Keys Electric Cooperative Assoc.			
5	Dennis Chastain – Tennessee Valley Authority	Yes		Thank you for your support.
6	Leonard Kula – Independent Electricity System Operator	Yes	Please see proposed additional scope under Q6.	Please see the drafting team response to your Question No. 6.
7	Thomas Foltz – AEP	Yes		Thank you for your support.
8	Oliver Burke –	Yes		Thank you for your support.

#	Commenter/ Organization	Y/N	Question 1 Comment	Drafting Team Response
	Entergy Services, Inc.			
9	Emily Rousseau – MRO	Yes		Thank you for your support.
10	Christina Bigelow – Electric Reliability Council of Texas, Inc.	Yes		Thank you for your support.
11	Rachel Coyne – Texas Reliability Entity, Inc.	Yes		Thank you for your support.
12	Andrew Pusztai – American Transmission Company, LLC	Yes		Thank you for your support.
13	Louis Slade – Dominion Resources, Inc.	Yes		Thank you for your support.
14	Scott McGough – Georgia System Operations Corporation	No	<ul style="list-style-type: none"> • If changes are NOT necessary to align the terms or if the differences are appropriate, NERC could modify the words or phrases in the ROP in a way to show that it is not the exact term as in the NERC Glossary. • Make changes in the ROP and not in the NERC Glossary. 	<ul style="list-style-type: none"> • Response to bullet 1: Thank you for your comment. The drafting team agrees and will take this into consideration as the team proceeds. • Response to bullet 2: At this early stage of the project, the drafting team is not able to conclude that that it will always be appropriate to propose changes to the ROP definition and not the Glossary definition. Under some circumstances, it may be more appropriate to make changes to the Glossary definition. For each cross-over term that is under consideration, the drafting team will conduct an analysis to assess which definition narrative should be revised. The team will consider the full development history of both definitions, all FERC orders addressing the definition, all applications of the term in the ROP and Reliability Standards (and how any proposed revisions will affect these provisions), and any other

#	Commenter/ Organization	Y/N	Question 1 Comment	Drafting Team Response
				<p>relevant information regarding the definition development and application. It may be the case that the majority of revisions are made to the ROP definitions; however, until the drafting team completes the necessary research and analysis, it is simply too early to tell. Additionally, as noted in your first comment, the research and analysis may reveal that the two definitions are intended to be different and the definitions should remain as is-with differences-because of how each definition is applied (either in the ROP or Reliability Standards). Under these circumstances, the drafting team will not propose revisions to either defined term.</p>
15	Lee Pedowicz – Northeast Power Coordinating Council	Yes		Thank you for your support.
16	Herb Schrayshuen	Yes		Thank you for your support.
17	Ben Engelby – ACES Power Marketing	Yes	We support the SAR as written. The inconsistencies between Glossary Terms in the Reliability Standards and the Rules of Procedure need to be addressed.	Thank you for your support.
18	Michael Lowman – Duke Energy	Yes		Thank you for your support.
19	Christy Koncz – Public Service Enterprise Group	No	<p>See the suggested redline below:</p> <p>“There are defined terms that appear in both the NERC Glossary of Terms and <u>and Appendix 2 of the Rules of Procedure</u> (“cross-over terms”) that are <u>intended to be the same</u> inconsistent in substance and form <u> (“cross-over terms”)</u>. <u>(Appendix 2 definitions that are intended to be the same as NERC</u></p>	Thank you for your comments. The drafting team respectfully disagrees with your statement that the project work should be limited to the definitions included in Appendix 2. There are a number of instances where defined terms occur in other sections of the ROP. The drafting team will review these section-only defined terms to determine whether alignment is appropriate.

#	Commenter/ Organization	Y/N	Question 1 Comment	Drafting Team Response
			<p><u>Glossary terms marked with **.) This Differences in such terms may</u> causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and <u>Appendix 2 of the</u> Rules of Procedure.”</p> <p>By the changes above, PSEG would be changing the SAR so that definitional alignment would <u>only</u> be undertaken for terms in Appendix 2 that are intended to be the same a NERC Glossary terms. Such terms are denoted in Appendix 2 with **, as explained on p.1 of Appendix 2:</p> <p>“Definitions of terms in this Appendix that are marked with asterisks (**) are taken from the NERC Glossary of Terms Used in Reliability Standards.”</p> <p>The “Industry Need” redline above would remove the terms “Net Energy for Load,” “Generator Owner” and “Generator Operator” (and any other Appendix 2 terms without **) from the scope of this SAR. <u>If the team decides to pursue intentional definitional differences, it should consider doing so in a second phase of this project under a separate SAR.</u> See additional comments on this topic in the PSEG response to question 5.</p>	<p>The drafting team agrees that the ROP terms marked with two asterisks [**] were originally taken from the Glossary. The drafting team will take this into consideration when it conducts an assessment because this is relevant to the definition history. For each cross-over term that is under consideration, the team will consider the full development history of both definitions (including whether the ROP version is marked with **), all FERC orders addressing the definition, all applications of the term in the ROP and Reliability Standards (and how any proposed revisions will affect these provisions), and any other relevant information regarding the definition development and application.</p> <p>Of note, the research and analysis may reveal that the two definitions are intended to be different and the definitions should remain as is-with differences-because of how each definition is applied (either in the ROP or Reliability Standards). Under these circumstances, the drafting team will not propose revisions to either defined term.</p>
20	Kathleen Black – DTE Energy	Yes		Thank you for your support.

#	Commenter/ Organization	Y/N	Question 1 Comment	Drafting Team Response
21	Randall Hubbard – Southern Company Services, Inc.			
22	Shannon Mickens – Southwest Power Pool, Inc. (RTO)	Yes	We agree with the drafting team in reference to the ‘Industry Need’ outlined in the SAR. The interpretation of various terms can and has led to confusion amongst the industry and the application in several Reliability Standards. We would like to see more consistency across the board in reference to all ‘cross-over’ terms and their definitions listed in all pertinent documentation.	Thank you for your support.
23	Fuchsia Davis - Bonneville Power Administration			
24	John Merrell – Tacoma Public Utilities (Tacoma, WA)	Yes		Thank you for your support.
25	Ben Li – Independent Electricity System Operator	Yes		Thank you for your support.
26	John Bee – Exelon	Yes	Exelon Companies encourage the SDT to recommend that there be only one Glossary.	Thank you for your comment. The drafting team agrees that in some respects it would be easier to have one document containing all of the NERC defined terms. However, due to the differences in how the two sources are revised and the differences in how the terms are used, the team is not recommending that the two sources are combined. The drafting team notes that the defined terms included in the Glossary and ROP are applicable only with regard to the source in which they are defined (Glossary terms only apply to Reliability Standards, whereas ROP terms only apply to

#	Commenter/ Organization	Y/N	Question 1 Comment	Drafting Team Response
				<p>provisions of the ROP). Given that the Reliability Standards and the ROP address very different subject matters and serve different purposes, the definitions are developed and maintained separately. Additionally, the process for revising Glossary terms is substantially different than for revising ROP terms. Glossary terms must be developed (and revised) in the same manner as Reliability Standards - by a drafting team and subject to industry ballot and approval (See Section 5 of the Standards Process Manual). On the other hand, revisions to the Rules of Procedure (including the defined terms found in Appendix 2) are undertaken through Section 1400 of the Rules of Procedure.</p>

2. The SAR provides that the purpose of the project is,

“to align the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”

Do you agree with the purpose statement for the project? If not, please explain the basis for your disagreement and provide a recommended purpose statement for the project.

#	Commenter/ Organization	Y/N	Question 2 Comment	Drafting Team Response
1	Jeremy Voll – Basin Electric Power Cooperative			
2	Charles Yeung – Southwest Power Pool, Inc. (RTO)	No	The SAR is unclear regarding what process(es) the SDT is evaluating. To the extent that this is intended to evaluate or revise formal processes such as the NERC Standards Development Process, such should be indicated. Further, to the extent that this is intended to provide flexibility to develop additional processes (either formal or informal definition development processes), such should be clarified.	Thank you for your comments. As the drafting team completes the task of aligning the cross-over terms (Goal 1), it will identify how the differences between the two terms came to exist. There may be a number of reasons why one term is defined differently than the other. Some definition differences may be intentional and necessary given the manner in which it is used in the particular source (either ROP or Reliability Standards); other differences may be unintentional and appropriate for alignment. To the extent the drafting team identifies development process improvement opportunities during the course of aligning the cross-over terms, the team will provide these recommendations to the Standards Committee and NERC. Because of the early stage of the project, it is not possible to state with specificity what the process improvement recommendations will be, but only that they may relate to the manner in which NERC defined terms are developed, applied, maintained, revised, approved and/or retired.

#	Commenter/ Organization	Y/N	Question 2 Comment	Drafting Team Response
3	John Fontenot – Bryan Texas Utilities	Yes		Thank you for your support.
4	Dennis Minton – Florida Keys Electric Cooperative Assoc.			
5	Dennis Chastain – Tennessee Valley Authority	Yes		Thank you for your support.
6	Leonard Kula – Independent Electricity System Operator	Yes	Please see proposed additional scope under Q6.	Please see the drafting team response to Question 6.
7	Thomas Foltz – AEP	Yes		Thank you for your support.
8	Oliver Burke – Entergy Services, Inc.	Yes		Thank you for your support.
9	Emily Rousseau – MRO	Yes		Thank you for your support.
10	Christina Bigelow – Electric Reliability Council of Texas, Inc.	Yes		Thank you for your support.
11	Rachel Coyne – Texas Reliability Entity, Inc.	Yes		Thank you for your support.
12	Andrew Pusztai – American Transmission Company, LLC	Yes		Thank you for your support.
13	Louis Slade – Dominion Resources, Inc.	Yes		Thank you for your support.
14	Scott McGough –	No	<ul style="list-style-type: none"> • If changes are NOT necessary to align the terms or if the differences are appropriate, NERC 	Please see the drafting team response to Question 1, No. 14.

#	Commenter/ Organization	Y/N	Question 2 Comment	Drafting Team Response
	Georgia System Operations Corporation		<p>could modify the words or phrases in the ROP in a way to show that it is not the exact term as in the NERC Glossary.</p> <ul style="list-style-type: none"> • Make changes in the ROP and not in the NERC Glossary. 	
15	Lee Pedowicz – Northeast Power Coordinating Council	Yes		Thank you for your support.
16	Herb Schrayshuen	Yes		
17	Ben Engelby – ACES Power Marketing	Yes	<p>While we agree with the purpose statement, we ask the drafting team to consider additional non-defined terms that are used in various glossary terms may need to be clarified to avoid confusion, such as “awareness,” “control,” “coordinate,” “dispatch,” and “operate,” to name a few. If such definitions were developed, a careful review of their use in the existing standards and their impact would be needed to ensure the definitions only offer clarity and do not modify the standard.</p> <p>It would be helpful if the drafting team posted a list of defined terms during the next comment period for industry to provide feedback and additional terms to be reviewed and aligned.</p>	<p>Thank you for your comments. The drafting team appreciates your comment, however, the drafting team believes creating new defined terms is not the focus of this particular project. If you desire such an effort, we suggest you submit a SAR outlining your concerns and request for additional defined terms.</p> <p>As part of the project work, the drafting team will provide industry with a listing of the various cross-over terms that are being considered for revision by the drafting team.</p>
18	Michael Lowman – Duke Energy	Yes		Thank you for your support.

#	Commenter/ Organization	Y/N	Question 2 Comment	Drafting Team Response
19	Christy Koncz – Public Service Enterprise Group	No	<p>PSEG recommends the following redline changes, which are consistent with its response to question 1.</p> <p>“to align the <u>cross-over terms</u> defined terms found in the NERC Glossary of Terms (Glossary) and <u>Appendix 2 of the</u> Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”</p>	<p>Thank you for your comments, however, the drafting team respectfully disagrees with your recommended changes since other definitions appear throughout the Rules of Procedure that may also be cross-over terms. For more information, please refer to the drafting team response to your Question No. 1, which addresses this same issue.</p>
20	Kathleen Black – DTE Energy	Yes		<p>Thank you for your support.</p>
21	Randall Hubbard – Southern Company Services, Inc.			
22	Shannon Mickens – Southwest Power Pool, Inc. (RTO)	Yes		<p>Thank you for your support.</p>
23	Fuchsia Davis – Bonneville Power Administration			
24	John Merrell – Tacoma Public Utilities (Tacoma, WA)	No	<p>Tacoma Power recommends the following modification: “to identify the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP) that need to be aligned; and, provide recommendations to enhance the current process(es) to prevent</p>	<p>Thank you for your comments. As part of the project work, the drafting team will provide industry with a listing of the various cross-over terms that are being considered for revision by the drafting team. Any changes to the ROP and Glossary will be made in accordance with the</p>

#	Commenter/ Organization	Y/N	Question 2 Comment	Drafting Team Response
			<p>future misalignment or inconsistencies in NERC defined terms.” Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.</p>	<p>applicable revision process (See, ROP, Section 1400 and Standards Process Manual, Section 5).</p> <p>Also, please see response to Question 2 No. 2 for more information regarding the recommendations the drafting team may make in connection with this project.</p>
25	Ben Li – Independent Electricity System Operator	No	<p>The SAR is unclear regarding what process(es) the SDT is evaluating To the extent that this is intended to evaluate or revise formal processes such as the NERC Standards Development Process, such should be indicated. Further, to the extent that this is intended to provide flexibility to develop additional processes (either formal or informal definition development processes), such should be clarified.</p>	<p>Thank you for your comments. As the drafting team completes the task of aligning the cross-over terms (Goal 1), it will identify how the differences between the two terms came to exist. There may be a number of reasons why one term is defined differently than the other. Some definition differences may be intentional and necessary given the manner in which it is used in the particular source (either ROP or Reliability Standards); other differences may be unintentional and ripe for alignment. To the extent the drafting team identifies development process improvement opportunities during the course of aligning the cross-over terms, the team will provide these recommendations to the Standards Committee and NERC. Because of the early stage of the project, it is not possible</p>

#	Commenter/ Organization	Y/N	Question 2 Comment	Drafting Team Response
				to state with specificity what the process improvement recommendations will be, but only that they may relate to the manner in which NERC defined terms are developed, applied, maintained, revised, approved and/or retired.
26	John Bee – Exelon	Yes		Thank you for your support.

3. The SAR identifies two goals for the project as follows:

Goal 1: For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP.

Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with the stated goals for the project? If not, please identify which goal(s) you do not agree with and provide a detailed description of your recommended goals for the project.

#	Commenter/ Organization	Y/N	Question 3 Comment	Drafting Team Response
1	Jeremy Voll – Basin Electric Power Cooperative			
2	Charles Yeung – Southwest Power Pool, Inc. (RTO)	No	Please refer to the SRC comment provided under Question 2.	Please refer to the drafting team response in Question 2, No. 2.
3	John Fontenot – Bryan Texas Utilities	Yes		Thank you for your support.
4	Dennis Minton – Florida Keys Electric Cooperative Assoc.			
5	Dennis Chastain – Tennessee Valley Authority	Yes		Thank you for your support.
6	Leonard Kula –	Yes	Please see proposed additional scope under Q6.	Please see response to Q6.

#	Commenter/ Organization	Y/N	Question 3 Comment	Drafting Team Response
	Independent Electricity System Operator			
7	Thomas Foltz – AEP	No	The phrases "where necessary, make revisions to align the terms" in Goal 1 and "if the differences are appropriate" in the objectives for Goal 1 both infer that there may be instances when inconsistent terms would be appropriate. Could the drafting team provide some scenarios to illustrate why inconsistencies would, in some cases, be acceptable?	Thank you for your comments. You are correct that there may be instances where inconsistent terms may be appropriate. While the drafting team will make every attempt to align the cross-over terms, there may be certain instances where an inconsistency remains because of the context in which the Glossary or the ROP uses the term. Through the development process the drafting team will identify each term under consideration, and to the extent the drafting team determines that inconsistencies should remain, the team will provide an explanation.
8	Oliver Burke – Entergy Services, Inc.	No	If a capitalized term is used in both the Glossary and the ROP, the Glossary definition should stand, and the ROP should be revised to use a different term, if the Glossary definition will not work for the usage of the term in the ROP. The Glossary terms all stood for a ballot by industry at one point in time, and NERC standards were approved at the time based on the then-understood Glossary definition of the term. NERC should change Glossary definitions of existing terms only rarely, and with great care, to avoid downstream chaos of mis-interpretation caused by having multiple vintage definitions of the same capitalized term by registered entities, compliance auditors, regional entities, NERC and FERC.	Thank you for your comments. The drafting team does not believe it is appropriate to make changes exclusively to the ROP. Under some circumstances, it may be more appropriate to make changes to the Glossary definition. As a result, the drafting team will review the cross-over terms and propose revisions on a case-by-case basis, making changes to the ROP or Glossary, as appropriate. For more information, see the drafting team response to Question 1, No. 14.
9	Emily Rousseau – MRO	Yes		Thank you for your support.
10	Christina Bigelow –	Yes		Thank you for your support.

#	Commenter/ Organization	Y/N	Question 3 Comment	Drafting Team Response
	Electric Reliability Council of Texas, Inc			
11	Rachel Coyne – Texas Reliability Entity, Inc.	Yes		Thank you for your support.
12	Andrew Puztai – American Transmission Company, LLC	Yes		Thank you for your support.
13	Louis Slade – Dominion - Dominion Resources, Inc.	Yes		Thank you for your support.
14	Scott McGough – Georgia System Operations Corporation	No	<ul style="list-style-type: none"> • If changes are NOT necessary to align the terms or if the differences are appropriate, NERC could modify the words or phrases in the ROP in a way to show that it is not the exact term as in the NERC Glossary. • Make changes in the ROP and not in the NERC Glossary. 	Please see the drafting team response to Question 1, No. 14.
15	Lee Pedowicz – Northeast Power Coordinating Council	Yes		Thank you for your support.
16	Herb Schrayshuen	Yes		Thank you for your support.
17	Ben Engelby – ACES Power Marketing	Yes	Regarding Goal 1, what would happen if the ROP changes receive different comments than the standards posting? These are two separate processes, and it may be necessary to consider a streamlined process to make consistent language changes between the NERC Glossary and the Rules of Procedure. If there is a new process introduced in this project, it could be used if any misaligned terms are identified in the future.	Thank you for your comment. The drafting team understands your concern with regard to the separate processes in place for making revisions to the Glossary and ROP. All proposed revisions to the Glossary terms will be made in accordance with the Standards Process Manual (Section 5). All proposed revisions to the ROP will be made in accordance with Section 1400 of the ROP.

#	Commenter/ Organization	Y/N	Question 3 Comment	Drafting Team Response
				<p>With regard to the process-improvement recommendations: As the drafting team completes the task of aligning the cross-over terms (Goal 1), it will identify how the differences between the two terms came to exist. There may be a number of reasons why one term is defined differently than the other. Some definition differences may be intentional and necessary given the manner in which it is used in the particular source (either ROP or Reliability Standards); other differences may be unintentional and ripe for alignment. To the extent the drafting team identifies development process improvement opportunities during the course of aligning the cross-over terms, the team will provide these recommendations to the Standards Committee and NERC. Because of the early stage of the project, it is not possible to state with specificity what the process improvement recommendations will be, but only that they may relate to the manner in which NERC defined terms are developed, applied, maintained, revised, approved and/or retired.</p>
18	Michael Lowman – Duke Energy	No	<p>Duke Energy suggests adding to the scope of the project those definitions within the NERC standards, Standard only definitions, that are inconsistent with the NERC Glossary of Term or Rules of Procedure (ROP). This would reduce the amount confusion within the industry if those identified definitions are consistent with the NERC Glossary of Terms and the ROP.</p>	<p>Thank you for your comments. The drafting team agrees that the standard-only defined terms may create confusion or lead to inconsistencies. The drafting team will identify any standard-only defined terms and to the extent the ROP defines the term, it will be considered a “cross-over term” ripe for alignment, if appropriate. Also, the drafting team notes that as part of Goal 2, the drafting team will assess the current processes in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) regarding improvements to the definition</p>

#	Commenter/ Organization	Y/N	Question 3 Comment	Drafting Team Response
				development process. The drafting team will consider a recommendation regarding standard-only defined terms.
19	Christy Koncz – Public Service Enterprise Group	No	To ensure that only Appendix 2 definitions are addressed, PSEG recommends this redline change to Goal 1: Goal 1: For cross-over terms in the Glossary and ROP Appendix 2 , identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP.	Thank you for your comment. Please see the drafting team response to your earlier comment (Question 1, No. 19), which addresses this issue.
20	Kathleen Black – DTE Energy	Yes		Thank you for your support.
21	Randall Hubbard – Southern Company Services, Inc.			
22	Shannon Mickens – Southwest Power Pool, Inc. (RTO)	Yes		Thank you for your support.
23	Fuchsia Davis – Bonneville Power Administration			
24	John Merrell – Tacoma Public Utilities (Tacoma, WA)	No	Tacoma Power recommends the following modification to Goal 1: “For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative. Where necessary, revisions to align the terms	Thank you for your comment. As outlined in response to your comment above (Question 2 No. 24), the drafting team will provide the industry with a listing of the

#	Commenter/ Organization	Y/N	Question 3 Comment	Drafting Team Response
			<p>will be addressed as part of a subsequent revision to the SAR.” Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and 2detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.</p> <p>Tacoma Power recommends the following modification to Goal 2: “Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned and to define a process for how future identified inconsistencies are handled.” The revised verbiage would address cases that might be overlooked by Project 2015-04.</p>	<p>various cross-over terms that are being considered for revision by the drafting team.</p> <p>As the drafting team completes the task of aligning the cross-over terms (Goal 1), it will identify how the differences between the two terms came to exist. There may be a number of reasons why one term is defined differently than the other. Some definition differences may be intentional and necessary given the manner in which it is used in the particular source (either ROP or Reliability Standards); other differences may be unintentional and ripe for alignment. To the extent the drafting team identifies development process improvement opportunities during the course of aligning the cross-over terms, the team will provide these recommendations to the Standards Committee and NERC. Because of the early stage of the project, it is not possible to state with specificity what the process improvement recommendations will be, but only that they may relate to the manner in which NERC defined terms are developed, applied, maintained, revised, approved and/or retired.</p>
25	Ben Li – Independent Electricity System Operator	No	Please refer to the SRC comment provided under Question 2.	Please refer to response to Question 2.
26	John Bee – Exelon	Yes		Thank you for your support.

4. The stated objectives for the project are as follows:

1. For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

2. For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

3. For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with these stated objectives? If you do not agree, please explain the basis for your disagreement and provide a detailed description of your recommended objectives for the project.

Summary Consideration:

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
1	Jeremy Voll – Basin Electric Power Cooperative			
2	Charles Yeung – Southwest Power Pool, Inc. (RTO)	No	Please refer to the SRC comment provided under Question 2 and 3.	Please refer to response to Question 2 and 3.
3	John Fontenot – Bryan Texas Utilities	Yes		Thank you for your support.
4	Dennis Minton –			

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
	Florida Keys Electric Cooperative Assoc.			
5	Dennis Chastain – Tennessee Valley Authority	Yes		Thank you for your support.
6	Leonard Kula – Independent Electricity System Operator	Yes	Please see proposed additional scope under Q6.	Please see response to Q6.
7	Thomas Foltz – AEP	No	The phrases "where necessary, make revisions to align the terms" in Goal 1 and "if the differences are appropriate" in the objectives for Goal 1 both infer that there may be instances when inconsistent terms would be appropriate. Could the drafting team provide some scenarios to illustrate why inconsistencies would, in some cases, be acceptable?	Please refer to the drafting team response to Question 3 No. 7.
8	Oliver Burke – Entergy Services, Inc.	Yes	See note to Question 3, which could be considered a 4th goal of this SAR/development effort.	Please see response to Question 3.
9	Emily Rousseau – MRO	Yes		Thank you for your support.
10	Christina Bigelow – Electric Reliability Council of Texas, Inc.	Yes		Thank you for your support.
11	Rachel Coyne – Texas Reliability Entity, Inc.	Yes		Thank you for your support.
12	Andrew Pusztai – American Transmission Company, LLC	Yes	<p>Clarifying Comment regarding Item #2 For Goal 1 above: <i>States, "For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved,..."</i></p> <p>ATC questions whether the SDT possibly have inserted a gap</p>	Thank you for your comment. For Goal 1, Item 2, the drafting team will consider cross-over terms that are not currently aligned, or may not be aligned in the future, as a result of (1) current development projects that are considering revising existing cross-over terms, (2) revisions to cross-

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
			<p>by referring to “board approved” which should be stated more correctly as “<i>Reliability Standards that have been approved by FERC and currently enforced</i>”, as part of the SAR Objectives. This project should be evaluating the impact that any changes to the defined terms may have on the existing Standards and ATC recommends the objective be revised to address this potential gap.</p>	<p>over terms that are board-approved and pending FERC approval; and, (3) revisions to cross-over terms that are FERC approved, but not yet effective or enforceable.</p> <p>The drafting team agrees that in determining whether revisions should be made to cross-over terms, the team should evaluate the impact any revisions would have on existing Reliability Standards.</p>
13	Louis Slade – Dominion - Dominion Resources, Inc.	Yes		Thank you for your support.
14	Scott McGough – Georgia System Operations Corporation	No		
15	Lee Pedowicz – Northeast Power Coordinating Council	No	<p>Items 1 and 2 can be combined to read:</p> <p>1. For Goal 1: For existing cross-over terms, and cross-over terms that are currently under revision, board approved, or pending regulatory approval that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.</p>	Thank you for your comment. The drafting team identified the two items separately in order to provide greater clarity. Additionally, resolution of the issues may be implemented differently for the items included in Objectives 1 and 2.
16	Herb Schrayshuen	Yes		Thank you for your support.
17	Ben Engelby – ACES Power Marketing	Yes	We agree with the objectives as written.	Thank you for your support.

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
18	Michael Lowman - Duke Energy	No	<p>Duke Energy suggests adding the following revisions for Goal 2:</p> <p>“3. For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) , if any, to allow for future development of defined terms that are consistent and aligned or propose such a process if one does not exist.”</p> <p>We believe the scope of the project for Goal 2 should be to not only revises current processes, but also to develop any additional process(es) necessary regarding changes or improvements to existing and future NERC defined terms.</p> <p>If our recommendation to review standard definitions is accepted, Duke Energy suggests the following revisions to Goal 1:</p> <p>“1. For Goal 1: For existing cross-over terms that are inconsistent, either within a standard or in the NERC Glossary of Terms, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.</p> <p>2. For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, , either within a standard or in the NERC Glossary of</p>	<p>Thank you for your comment. The drafting team agrees that the process improvement recommendations could include changes to the existing processes and development of new processes, if appropriate.</p> <p>As the drafting team completes the task of aligning the cross-over terms (Goal 1), it will identify how the differences between the two terms came to exist. There may be a number of reasons why one term is defined differently than the other. Some definition differences may be intentional and necessary given the manner in which it is used in the particular source (either ROP or Reliability Standards); other differences may be unintentional and ripe for alignment. To the extent the drafting team identifies development process improvement opportunities during the course of aligning the cross-over terms, the team will provide these recommendations to the Standards Committee and NERC. Because of the early stage of the project, it is not possible to state with specificity what the process improvement recommendations will be, but only that they may relate to the manner in which NERC defined terms are developed, applied, maintained, revised, approved and/or retired.</p>

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
			Terms, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.”	
19	Christy Koncz – Public Service Enterprise Group	Yes	We agree with the objectives, provided that the substance of our comments in questions 1, 2, and 3 are adopted.	Thank you for your support. Please see the drafting team response to your Questions 1, 2 and 3.
20	Kathleen Black – DTE Energy	Yes		Thank you for your support.
21	Randall Hubbard – Southern Company Services, Inc.	No	<p>Please see proposed wording in bold:</p> <p>For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes to such terms are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.</p> <p>For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes to such definitions are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.</p>	Thank you for your comment. The drafting team believes the suggested language is implied in the current language and no additional clarity is needed.
22	Shannon Mickens - Southwest Power Pool, Inc. (RTO)	Yes		Thank you for your support.

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
23	Fuchsia Davis - Bonneville Power Administration -			
24	John Merrell - Tacoma Public Utilities (Tacoma, WA)	No	<p>Tacoma Power recommends the following modification to the first objective: “Identify existing cross-over terms that are inconsistent and evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, seek industry approval to revise the SAR to authorize revisions to the identified defined term(s).” Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.</p> <p>Tacoma Power recommends the following modification to the second objective: “Identify cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval and evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, seek industry approval to revise the SAR to authorize revisions to the defined term(s).” Tacoma Power believes the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose,</p>	<p>Thank you for your comment. The drafting team addressed your concerns in response to Question 3, No. 4.</p>

#	Commenter/ Organization	Y/N	Question 4 Comment	Drafting Team Response
			<p>goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.</p> <p>Tacoma Power recommends the following modification to the third objective: “Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned and to define a process for how future identified inconsistencies are handled.” The revised verbiage would address cases that might be overlooked by Project 2015-04.</p>	
25	Ben Li – Independent Electricity System Operator	No	For Goal 2, please refer to the comments to Questions (2) and (3).	Please refer to the drafting team response to your Question 2 and 3.
26	John Bee – Exelon	Yes		Thank you for your support.

5. The “Detailed Description” section of the SAR provides a non-exhaustive, illustrative listing of the types of work that will be undertaken by the drafting team. Do you agree with the “Detailed Description” section of the SAR? If you do not agree with the description of the work that will be undertaken by the drafting team, please state the basis for your disagreement and provide a detailed description of what work you believe should be undertaken.

Summary Consideration:

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
1	Jeremy Voll – Basin Electric Power Cooperative			
2	Charles Yeung – Southwest Power Pool, Inc. (RTO)	No	The SAR discusses reviews regarding consistency between defined terms that are capitalized and similar terms that are not, the SRC respectfully requests that the SDT take the totality of the potential impacts to standards into consideration when proposing modifications to defined terms and/or lower-cased terms. If such changes are not thoroughly evaluated for all potential impacts, unintended consequences may result. As depicted in the Standards Process Manual, all new or revised definitions must go through the same vetting process as new/revised standards, i.e., they need to be posted for comment then balloted.	Thank you for your comments. The drafting team agrees that it should take the totality of potential impacts into consideration before proposing revisions to cross-over terms. For each cross-over term that is under consideration, the drafting team will conduct an analysis to assess which definition narrative should be revised. The team will consider the full development history of both definitions, all FERC orders addressing the definition, all applications of the term in the ROP and Reliability Standards (and how any proposed revisions will affect these provisions), and any other relevant information regarding the definition development and application. The research and analysis may reveal that the two definitions are intended to be different and the definitions should remain as-is-with differences-because of how each definition is applied (either in the ROP or Reliability Standards).

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
				<p>Under these circumstances, the drafting team will not propose revisions to either defined term.</p> <p>Additionally, the drafting team notes that it will follow the appropriate process for proposing revisions to Glossary terms (Section 5 of the Standards Process Manual) and the ROP (Section 1400 of the ROP).</p>
3	John Fontenot – Bryan Texas Utilities	Yes		Thank you for your support.
4	Dennis Minton – Florida Keys Electric Cooperative Assoc.			
5	Dennis Chastain – Tennessee Valley Authority	Yes		Thank you for your support.
6	Leonard Kula – Independent Electricity System Operator	Yes	Please see proposed additional scope under Q6.	Thank you for your support.
7	Thomas Foltz – AEP	Yes		Thank you for your support.
8	Oliver Burke – Entergy Services, Inc.	Yes		Thank you for your support.
9	Emily Rousseau – MRO	Yes		Thank you for your support.
10	Christina Bigelow – Electric Reliability Council of Texas, Inc.	Yes		Thank you for your support.

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
11	Rachel Coyne – Texas Reliability Entity, Inc.	Yes		Thank you for your support.
12	Andrew Pusztai – American Transmission Company, LLC	Yes		Thank you for your support.
13	Louis Slade – Dominion Resources, Inc.	Yes		Thank you for your support.
14	Scott McGough – Georgia System Operations Corporation	No	<ul style="list-style-type: none"> • If changes are NOT necessary to align the terms or if the differences are appropriate, NERC could modify the words or phrases in the ROP in a way to show that it is not the exact term as in the NERC Glossary. • Make changes in the ROP and not in the NERC Glossary. 	Please see the drafting team response to this issue in Question 1, No. 14.
15	Lee Pedowicz – Northeast Power Coordinating Council	No	The impact of Paragraph 81 must be considered.	Thank you for your comments. As part of the work related to Goal 2, the drafting team will identify recommendations for improving the definition development processes in the Glossary and/or the ROP. This may include a recommendation for a comprehensive review of the existing Glossary and ROP defined terms to determine whether any terms should be retired. The drafting team encourages you to attend the drafting team meetings as an observer and provide any specific recommendations to the team as they continue their work on this project.
16	Herb Schrayshuen	No	Coordination with the terms in the functional model documents should be undertaken in conjunction with this effort.	Thank you for your comments. The drafting team work will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
				Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.
17	Ben Engelby – ACES Power Marketing	No	The examples listed were appropriate terms to align. In addition to already defined NERC standards, it would be helpful for the drafting team to develop or make recommendations to develop future definitions for certain NERC Glossary Terms, such as but not limited to “Generator Interconnection” or “Systematic Approach to Training.” If such definitions were developed, a careful review of their use in the existing standards and their impact would be needed to ensure the definitions only offer clarity and do not modify the standard.	Thank you for your comments. The drafting team refers you to the response to your Question 2, No. 7, which addresses this issue.
18	Michael Lowman – Duke Energy	Yes		Thank you for your support.
19	Christy Koncz – Public Service Enterprise Group	No	<p>Intentional differences may exist between identical terms defined in Appendix 2 and the NERC Glossary. Differences are assumed to be intentional if the Appendix 2 definition does not have the ** mark which indicates it is taken from the NERC Glossary.</p> <p>Goal 2’s objective (identifying process improvements “to allow for future development of defined terms that are consistent and aligned”) cannot be achieved if definitional differences are intentional.</p> <p><u>If the team decides to pursue intentional definitional differences, it should consider doing so in a second phase of this project under a separate SAR.</u> For phase 2, the project</p>	Thank you for your comments. The drafting team agrees that intentional differences may exist between the definition narratives of cross-over terms, and the team will take this into consideration before proposing revisions to cross-over terms. For each cross-over term that is under consideration, the drafting team will conduct an analysis to assess which definition narrative should be revised. The team will consider the full development history of both definitions, all FERC orders addressing the definition, all applications of the term in the ROP and Reliability Standards (and how any proposed revisions will affect these provisions), and any other relevant information regarding the definition

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
			<p>team should prepare a list of all Appendix 2 terms <i>not</i> marked with a ** and NERC Glossary terms which are identical in name but which are defined differently. This list should then be provided to NERC since they prepare ROP filings. NERC Legal could serve as a point of contact. If NERC desires a change in a NERC Glossary term, they should provide the particulars that support the NERC Glossary term change to the project team for its action.</p> <p>Two examples of Appendix 2 definitions that are intentionally different from their NERC Glossary counterparts are discussed below.</p> <ul style="list-style-type: none"> • The two sentences in the “Detailed Description” section of the SAR that discuss the “Net Energy for Load” (NEL) definition should be deleted. NEL is used in ROP Section 1100 – Annual NERC Business Plans and Budgets to allocate NERC and Regional Costs to Load-Serving Entities. • The last paragraph in the “Detailed Description” section of the SAR that addresses Generator Owner and Generator Operator should be deleted. In the Risk-Based Registration proceeding in Docket No. 15-4-000, FERC approved changes to the Appendix 2 definitions of Generator Owner and Generator Operator. In that same proceeding, NERC made changes in Appendix 5A - Organization Registration and Certification Manual. The “before” and “after” language from Section II of Appendix 5A is shown below. 	<p>development and application. The research and analysis may reveal that the two definitions are intended to be different and the definitions should remain as is-with differences-because of how each definition is applied (either in the ROP or Reliability Standards). Under these circumstances, the drafting team will not propose revisions to either defined term.</p> <p>Additionally, the drafting team notes that it will follow the appropriate process for proposing revisions to Glossary terms (Section 5 of the Standards Process Manual) and the ROP (Section 1400 of the ROP).</p>

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
			<p>Before: Organization Registration – Entities Required to Register</p> <p>All industry participants responsible for one or more of the functions below must register for each function through the Organization Registration Program. These entities are defined in the Glossary of Terms with responsibilities designated by the individual Reliability Standards and the NERC <i>Statement of Compliance Registry Criteria</i> document.</p> <p>After: Organization Registration – Entities Required to Register</p> <p>All industry participants responsible for one or more of the functions below must register for each function through the Organization Registration Program. These entities are defined in the NERC <i>Statement of Compliance Registry Criteria</i>.</p> <p>Prior to the change to Appendix 5A, NERC Glossary Terms <u>were</u> used for registration functions; however, after the change, this linkage no longer exists.</p> <p>NERC stated the following in its January 26, 2015 comments in RR15-4-000 (at 6):</p> <p>“NERC further notes that there is no basis in Commission precedent for the PSEG Companies’ argument that definitions in the NERC Glossary and the NERC Statement of Compliance Registry Criteria and Appendix 2 must be identical. In fact, the Commission has approved amendments to the Rules of Procedure with those sections retaining</p>	

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
			<p>their respective terms. There is no need for the Commission to address or resolve this matter in the instant docket.²⁴ ”</p> <p>²⁴ See e.g., Project 2015-04 Alignment of NERC Glossary of Terms and Definitions Used in “the Rules of Procedure (Appendix 2 of the Rules of Procedure).</p>	
20	Kathleen Black – DTE Energy	Yes		Thank you for your support.
21	Randall Hubbard - Southern Company Services, Inc.			
22	Shannon Mickens - Southwest Power Pool, Inc.	Yes		Thank you for your support.
23	Fuchsia Davis - Bonneville Power Administration			
24	John Merrell – Tacoma Public Utilities (Tacoma, WA)	No	<p>Please refer to Tacoma Power’s comments on Questions 2-4. Specifically, Tacoma Power believes the Detailed Description should include a complete list of identified cross-over terms that are inconsistent and that require changes to align the terms. This would require a two-step process. The first step would be identification. The second step would be authorization to proceed with proposing revisions. The basis for suggesting this two-step approach is that the industry needs to know the terms that will be subject to revision in order to correctly assess and comment on the SAR purpose, goals, objectives, and detailed description of the proposed revision process. Identifying the impacted terms is a</p>	Thank you for your comment. Please refer to the drafting team response to Question 2, 3, and 4, which addresses this issue.

#	Commenter/ Organization	Y/ N	Question 5 Comment	Drafting Team Response
			<p>necessary antecedent to drafting the purpose, goals, objectives, and detailed description because of the following: (1) Without a list of effected terms, it is not clear which resources and personnel will be needed to correctly analyze the proposed revisions; (2) without a list of effected terms, it is impossible to assess and evaluate the potential impact on existing policies, procedures, etc.</p>	
25	Ben Li – Independent Electricity System Operator	No	<p>The SAR discusses reviews regarding consistency between defined terms that are capitalized and similar terms that are not, the SRC respectfully requests that the SDT take the totality of the potential impacts to standards into consideration when proposing modifications to defined terms and/or lower-cased terms. If such changes are not thoroughly evaluated for all potential impacts, unintended consequences may result. As depicted in the Standards Process Manual, all new or revised definitions must go through the same vetting process as new/ revised standards, i.e., they need to be posted for comment then balloted.</p>	<p>Thank you for your comments. The drafting team agrees that it should take the totality of potential impacts into consideration before proposing revisions to cross-over terms. For each cross-over term that is under consideration, the drafting team will conduct an analysis to assess which definition narrative should be revised. The team will consider the full development history of both definitions, all FERC orders addressing the definition, all applications of the term in the ROP and Reliability Standards (and how any proposed revisions will affect these provisions), and any other relevant information regarding the definition development and application. The research and analysis may reveal that the two definitions are intended to be different and the definitions should remain as is-with differences-because of how each definition is applied (either in the ROP or Reliability Standards). Under these circumstances, the drafting team will not propose revisions to either defined term.</p>
26	John Bee – Exelon	Yes		

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

Summary Consideration:

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
1	Jeremy Voll – Basin Electric Power Cooperative			
2	Charles Yeung – Southwest Power Pool, Inc. (RTO)	Yes	Comments: The SRC recommends clarifying the scope of the SAR to ensure consistency of terms across all important documents that form the basis for Reliability Standards development. In particular, the Functional Model, which is captured in Appendix 5 to the ROP, also exists outside of the ROP. As it provides the framework for the development and applicability of NERC’s Reliability Standards, the SRC suggests that the purpose statement, scope of work, goals and detail description of work clarify whether the SDT is intending to include reviewing terms defined in the Functional Model, and ensuring consistency across the Glossary, ROP and Functional Model.	Thank you for your comments. The drafting team agrees that to the extent possible, there should be consistency of terminology across NERC documents. The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.
3	John Fontenot – Bryan Texas Utilities	No		
4	Dennis Minton – Florida Keys Electric Cooperative Assoc.			
5	Dennis Chastain – Tennessee Valley Authority			
6	Leonard Kula –	Yes	We agree with all of the above, but believe that the scope of this project falls a bit short of ensuring consistency of terms	Thank you for your comments. The drafting team agrees that to the extent possible, there should be

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
	Independent Electricity System Operator		across all important documents that form the basis for Reliability Standards development. The Functional Model, though not required to be approved by regulatory authorities, provides the framework for the development and applicability of NERC’s Reliability Standards. We therefore suggest that the purpose statement, scope of work, goals and detail description of work be expanded to include reviewing terms defined in the Functional Model, and ensuring consistency across the Glossary, ROP and Functional Model.	consistency of terminology across all important NERC documents. The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.
7	Thomas Foltz – AEP	Yes	In addition to the potential inconsistencies identified in NERC’s glossary and ROP, there are many other inconsistencies between the terms used by NERC and the RTOs. Though we realize this the scope of project is limited to the terms used solely within NERC, we also believe there is a need to examine and ensure the consistency of terms between NERC and the RTOs.	Thank you for your comments. The drafting team agrees that to the extent possible, there should be consistency of terminology across NERC documents. The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. Other working groups will be provided with the results of the drafting team work, so that appropriate changes can be made to the appropriate documents.
8	Oliver Burke – Entergy Services, Inc.	Yes	<p>Registered entities must be able to depend on the published definitions for terms used in reliability standards. One important step in that direction would be to avoid re-defining Glossary terms once they are entered into the Glossary the first time. If that is not possible, a new term could be coined, possibly. If a term *must* be redefined, then every requirement in every standard that uses that term (or a derivative term*) should be put up for ballot again.</p> <ul style="list-style-type: none"> • Example: “Adverse Reliability Impact” has two defined terms in its definition in the Glossary: “Bulk Electric System” and “Cascading”. 	Thank you for your comment. The drafting team agrees with your statement that entities must be able to depend on the FERC-approved definitions of terms. The drafting team intends to provide suggestions to the Standards Committee associated with your concern. It will be the decision of the Standards Committee regarding how to best proceed with the drafting team recommendations.

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
			<p>Adverse Reliability Impact: 8/4/2011, The impact of an event that results in Bulk Electric System instability or Cascading.</p> <p>Bulk Electric System²: Unless modified by the lists shown below, all Transmission Elements operated at 100 kV or higher and Real Power and Reactive Power resources connected at 100 kV or higher. This does not include facilities used in the local distribution of electric energy. Inclusions:</p> <ul style="list-style-type: none"> · I1 - Transformers with the primary terminal and at least one secondary terminal operated at 100 kV or higher unless excluded under Exclusion E1 or E3. · I2 - Generating resource(s) with gross individual nameplate rating greater than 20 MVA or gross plant/facility aggregate nameplate rating greater than 75 MVA including the generator terminals through the high-side of the step-up transformer(s) connected at a voltage of 100 kV or above. · I3 - Blackstart Resources identified in the Transmission Operator’s restoration plan. · I4 - Dispersed power producing resources with aggregate capacity greater than 75 MVA (gross aggregate nameplate rating) utilizing a system designed primarily for aggregating capacity, connected at a common point at a voltage of 100 kV or above. [The remainder of this definition was truncated, as this is only for illustrative purposes.] <p>Cascading: 2/8/2005, 3/16/2007: The uncontrolled successive loss of system elements triggered by an</p>	

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
			<p>incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.</p> <p>If this definition of “Cascading” was changed, then every standard that references “Cascading” and every standard which references “Adverse Reliability Impact” should be re-balloted with the new definition.</p> <p>Also, NERC should consider whether it is possible to adopt a new policy for updating the Glossary to require that new or revised definitions must avoid using Glossary-defined terms as part of the definitions of other Glossary terms. This could limit the confusion going forward. Some usage of defined terms will be unavoidable (such as BES), but others may be possible to avoid.</p>	
9	Emily Rousseau – MRO	No		
10	Christina Bigelow - Electric Reliability Council of Texas, Inc.	No		
11	Rachel Coyne – Texas Reliability Entity, Inc.	No		
12	Andrew Pusztai – American Transmission Company, LLC			

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
13	Louis Slade - Dominion - Dominion Resources, Inc.	Yes	<p>Page 1 - SAR Requestor Information; Dominion suggests adding the SAR DT chair name and the NERC staffers name behind their phone numbers, for completeness.</p> <p>Dominion does not agree with “N/A” in column labeled “Standard No.” in the box labeled “Related Standards” (page 6 of the SAR). We would prefer it indicate “as applicable” with the explanation “as applies to standards that contain terms defined in the NERC Glossary of Terms”.</p>	<p>Thank you for your comment. The drafting team roster and contact information can be located on the Project 2015-04 project page.</p> <p>The drafting team will not revise any Reliability Standards in the course of its work. The team will propose revisions to defined terms contained in the Glossary or ROP.</p>
14	Scott McGough – Georgia System Operations Corporation			
15	Lee Pedowicz - Northeast Power Coordinating Council	Yes	<p>Any effort to line up the NERC Glossary of Terms which are used in Standards, with the Rules of Procedure definitions should include an effort to at least identify inconsistencies with terms found in the NERC Functional Model Version 6 and notify the Functional Model Advisory Group of any such inconsistencies. On page 1 in the SAR Requester Information section suggest adding the SAR Drafting Team chair’s name and the NERC Staffer’s name behind their phone numbers for completeness.</p> <p>In the section labeled “Related Standards” on page 6 of the SAR suggest replacing the “N/A” in the column entitled “Standard No.” with “as applicable”. The concomitant entry in the Explanation column to be added would be “as applies to standards that contain terms defined in the NERC Glossary of Terms”.</p> <p>The NERC <i>Glossary of Terms</i> are voted on by industry, approved</p>	<p>Thank you for your comments. The drafting team agrees that to the extent possible, there should be consistency of terminology across NERC documents. The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.</p> <p>The drafting team roster and contact information can be located on the Project 2015-04 project page.</p> <p>With regard to the “Related Standards” section: The drafting team will not revise any Reliability Standards in the course of its work. The team will</p>

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
			<p>by the NERC BOT, and approved by FERC. The NERC ROP changes are only adopted by the NERC BOT (with input from the MRC), and are approved by FERC. Also, the NERC <i>Glossary of Terms</i> applies to NERC Reliability Standards. These standards are auditable, enforceable and sanction-able. The NERC ROP and Functional Model have other purposes, outside of compliance (i.e., the ROP contains administrative and governance procedures and the Functional Model is for registration purposes). A “Conflicts” clause that makes one agreement or document takes precedence over all others in a conflict should be added. Suggest the following:</p> <p>“The NERC <i>Glossary of Terms</i> shall apply and have precedence when interpreting the meaning of terms used in NERC Reliability Standards. Definitions of terms in the NERC RoP and Functional Model documents, which may or may not be in agreement or conflict, shall only be used to clarify the meaning of terms used in the RoP and Functional Model documents, and shall not have precedence over the NERC <i>Glossary of Terms</i> in matters of Reliability Standard interpretations, compliance audits, enforcement or in the development of sanctions. Deference and precedence should be given to the NERC <i>Glossary of Terms</i> in interpreting the definition of terms used in all NERC documents.”</p> <p>OR</p> <p>“In the event of a conflict between the definition of terms cited in the NERC Glossary of Terms, the definition used in a single</p>	<p>propose revisions to defined terms contained in the Glossary or ROP.</p> <p>With regard to your suggestion to adding a “conflicts clause:” The drafting team agrees that in some respects it would be easier to have one document containing all of the NERC defined terms, or create a “conflicts clause” that outlines which source takes precedence. However, due to the differences in how the two sources are revised and the differences in how the terms are used, the team is not making any recommendations on this issue. The drafting team notes that the defined terms included in the Glossary and ROP are applicable only with regard to the source in which they are defined (Glossary terms only apply to Reliability Standards, whereas ROP terms only apply to provisions of the ROP). Given that the Reliability Standards and the ROP address very different subject matters and serve different purposes, the definitions are developed and maintained separately. Additionally, the process for revising Glossary terms is substantially different than for revising ROP terms. Glossary terms must be developed (and revised) in the same manner as Reliability Standards - by a drafting team and subject to industry ballot and approval (See Section 5 of the Standards Process Manual). On the other hand, revisions to the Rules of Procedure (including the defined terms found in Appendix 2) are undertaken through Section 1400 of the Rules of Procedure. For</p>

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
			<p>reliability standard, or the definition provided in any other NERC document (e.g., RoP, Functional Model), the following order of precedence shall apply:</p> <ol style="list-style-type: none"> 1. The NERC Glossary of Terms definitions shall apply, unless superseded or modified by a Single Standard definition presented at the beginning of the standard under the Definition of Terms heading. 2. A Single Standard definition presented at the beginning of the standard under the Definition of Terms heading shall only apply for that one reliability standard. 3. Footnote, Rationale Box and Guidance Document definitions shall take precedence only if there are no NERC Glossary of Terms or Single Standard definitions. 4. Definitions of terms presented in other NERC documents (e.g., RoP, Functional Model, RSAW's) will have no standing in the presence of the NERC Glossary of Terms, Single Standard definitions or standard Footnote, Rationale Box and Guidance Document definitions. They shall only apply where the drafting history of the standard clearly supports and shows the intent of the standard drafting team and the industry balloting to support their application to the single standard. 5. Definitions contained in approved interpretations of standards, which are appended to the original standard, are incorporated into the standard and shall therefore assume the same level of precedence as any Single Standard definition." 	<p>purposes of Project 2015-04, all proposed revisions to the Glossary terms will be made in accordance with the Standards Process Manual (Section 5). All proposed revisions to the ROP will be made in accordance with Section 1400 of the ROP.</p>
16	Herb Schrayshuen			

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
17	Ben Engelby – ACES Power Marketing	Yes	We agree with the direction that the drafting team is taking to address inconsistencies in the NERC Glossary. We ask that the team consider CIP definitions in addition to the Operations and Planning standards to ensure consistency throughout all NERC terms.	Thank you for your support. The drafting team agrees that both CIP- and O&P-related terms should be addressed in this project.
18	Michael Lowman - Duke Energy	No		
19	Christy Koncz – Public Service Enterprise Group	No	No additional comments	
20	Kathleen Black – DTE Energy	Yes	Comparing the NERC Glossary to the information listed in the Rules of Procedure is a good idea.	Thank you for your support.
21	Randall Hubbard - Southern Company Services, Inc.	Yes	Our only other comment with the SAR is that it contains lengthy redundant wording.	Thank you for your support
22	Shannon Mickens - Southwest Power Pool, Inc. (RTO)	Yes	We would suggest to the drafting team to take into consideration and adding the term(s) 'Contingency Reserves', 'System Operating Limit-SOL' and 'Interconnection Reliability Operating Limit-IROL' to the list of 'cross-over' terms to be evaluated in your process. It is our concern that these specific terms are used in various Reliability Standards and the interpretation of each has caused confusion in the industry.	Thank you for your comment. The drafting team will consider all cross-over terms during the course of its work. Of note, "Contingency Reserves" is defined in the Glossary, but not in the ROP. Therefore, it is not a "cross-over" term under consideration.
23	Fuchsia Davis - Bonneville Power Administration			
24	John Merrell - Tacoma Public Utilities (Tacoma, WA)	No		

#	Commenter/ Organization	Y/N	Question 6 Comment	Drafting Team Response
25	Ben Li – Independent Electricity System Operator	Yes	The SRC recommends clarifying the scope of the SAR to ensure consistency of terms across all important documents that form the basis for Reliability Standards development. In particular, the Functional Model, which is captured in Appendix 5 to the ROP, also exists outside of the ROP. As it provides the framework for the development and applicability of NERC’s Reliability Standards, the SRC suggests that the purpose statement, scope of work, goals and detail description of work clarify whether the SDT is intending to include reviewing terms defined in the Functional Model, and ensuring consistency across the Glossary, ROP and Functional Model.	Thank you for your comments. The drafting team agrees that to the extent possible, there should be consistency of terminology across NERC documents. The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.
26	John Bee - Exelon			