

Consideration of Comments

Project Name: 2017-07 Standards Alignment with Registration SAR | MOD-032-1

Comment Period Start Date: 8/1/2017

Comment Period End Date: 8/30/2017

Associated Ballots:

There were 18 sets of responses, including comments from approximately 63 different people from approximately 51 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the proposed scope and objectives for Project 2017-07 described in the SAR for MOD-032-1? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

2. If you have any other comments on this SAR 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
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Shari Heino	Brazos Electric Power Cooperative, Inc.	1,5	Texas RE
					Dave Viar	Southern Maryland Electric Cooperative	3,4	RF
					Amber Skillern	East Kentucky Power Cooperative	1,3	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Karl Kohlrus	Prairie Power, Inc.	1,3	SERC
					Mark Ringhausen	Old Dominion Electric Cooperative	3,4	SERC
Entergy	Julie Hall	6		Entergy/NERC Compliance	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jaclyn Massey	Entergy - Entergy Services, Inc.	5	SERC
Northeast Power	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC

Coordinating
 Council

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
Michael Forte	Con Edison	1	NPCC
Kelly Silver	Con Edison	3	NPCC
Peter Yost	Con Edison	4	NPCC
Brian O'Boyle	Con Edison	5	NPCC
Michael Schiavone	National Grid	1	NPCC
Michael Jones	National Grid	3	NPCC

					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Helen Lainis	IESO	2	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Deborah McEndaffer	Midwest Energy, Inc	NA - Not Applicable	SPP RE
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Robert Hirschak	Cleco Corporation	6	SPP RE

					Kevin Giles	Westar Energy	1	SPP RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
PPL - Louisville Gas and Electric Co.	Shelby Wade	3,5,6	RF,SERC	Louisville Gas and Electric Company and Kentucky Utilities Company	Charles Freibert	PPL - Louisville Gas and Electric Co.	3	SERC
					Dan Wilson	PPL - Louisville Gas and Electric Co.	5	SERC
					Linn Oelker	PPL - Louisville Gas and Electric Co.	6	SERC

1. Do you agree with the proposed scope and objectives for Project 2017-07 described in the SAR for MOD-032-1? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Thomas Foltz - AEP - 3,5

Answer No

Document Name

Comment

While AEP supports the proposed direction and scope of the drafting team as expressed in the two SARs, AEP seeks clarity as to why more than one SAR is being proposed for a single project. While a project’s SAR may certainly be revised over time as needed, we see no allowance within Appendix 3A (Standards Process Manual) for multiple, concurrent SARs to govern a single project.

Likes 0

Dislikes 0

Response

Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer No

Document Name

Comment

The project scope proposes to remove Load Serving Entity (LSE) from Attachment 1 and the Applicability Section (4.1.3) of MOD-032-1 and replace with Distribution Provider (DP) as the applicable entity. The inclusion of the LSE in MOD-032-1 was to allow Planning Coordinators (PC) and Transmission Planners (TP) to request Demand data from the LSE (see Attachment 1 to MOD-032-1). To replace the LSE with DP is not effective because Demand data is information that a DP does not have. If the LSE is replaced with the DP in MOD-032-1, in order to comply, a DP would need to request the LSE data (i.e., Demand) from the Transmission Owner (TO) who would obtain the LSE data through

their OATT processes. This process is unnecessarily cumbersome. Since Planning Coordinators and Transmission Planners can request LSE data from Transmission Owners our suggestion is to simply remove LSE from the Applicability Section (4.1.3), requirements R2 and R3, and Attachment 1 of MOD-032-1 (but replace LSE with the TO where Demand data is listed in Attachment 1).

Additionally, we believe there is value in finalizing needed updates to the NERC Functional Model and the Functional Model Technical Document as posted to and commented upon by the industry in September 2016 prior to approving this SAR. Those documents are a useful guide in understanding the proper scope of the functional roles and how the elimination of certain functional categories can be addressed in the relevant reliability standards.

Likes 0

Dislikes 0

Response

Stephanie Burns - International Transmission Company Holdings Corporation - 1 - MRO,SPP RE,RF

Answer No

Document Name

Comment

MOD-032 requires data be provided by applicable entity functions that have been retired. For this standard, this data is critical and the industry cannot rely on getting data from a functional entity that has no compliance obligation to provide it.

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer No

Document Name	
Comment	
<ol style="list-style-type: none"> 1. We believe references to the reassignment of Load-Serving Entity (LSE) requirements should be broader, as several previous standard development projects identified other alternative functions (e.g. Resource Planner) instead of one single function (i.e. Distribution Provider). Moreover, the objective should allow this Standard Drafting Team to revise the requirement to align with those functions' capabilities. We caution the use of references to model distribution facilities, as these are outside the scope of the BES definition and Risk-based Registration. Furthermore, many registered entities may operate with smaller non-registered entities and end-user customers that are not obligated to provide such information to their utilities (e.g. rooftop solar PV resources). We propose limiting the language of the scope and objectives to only focus on the reassignment of LSE requirements with applicable functions and revising such requirements to align with those functions' capabilities. 2. An objective should be included to assess other requirements that could be deemed administrative or align with other Paragraph 81 criteria. Over the past two years, industry and the ERO Enterprise have identified these requirements through a standards grading evaluation conducted by Regional Entity and NERC Technical Committee representatives. 	
Likes	0
Dislikes	0
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
We agree with the need to review the alignment issue, but reserve judgment on the proposed changes to the affected standards.	
Likes	0
Dislikes	0
Response	

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
SRP supports the objectives of Project 2017-07 as described in the SAR.	
Likes 0	
Dislikes 0	
Response	
Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy/NERC Compliance	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Daniel Grinkevich - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
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	
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	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	

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

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer

Document Name

Comment

We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response

Stephanie Burns - International Transmission Company Holdings Corporation - 1 - MRO,SPP RE,RF

Answer

Document Name

Comment

The SPP Standards Review Group recommends that the Standards Authorization Request (SAR) author capitalizes the term ' bulk power system' which is mentioned in the Purpose or Goal Section of the document (page 1). From our perspective, the term is defined in the NERC Glossary of Terms and not capitalizing it may create confusion on the terms purpose and intent.

Additionally, we recommend that the drafting team review the definition of the term 'Distribution Provider' in the NERC Glossary of Terms, RoP (Appendix 2) and the Functional Model. Through our observation, the definition properly aligns with only two of the three documents (The NERC Glossary of Terms and RoP) which can be reviewed in the definitions shown below.

DP (Glossary of Terms and RoP) - Provides and operates the “wires” between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the distribution function at any voltage.

DP (Functional Model) - The functional entity that provides facilities that interconnect an End-use Customer load and the electric system for the transfer of electrical energy to the End-use Customer.

From our perspective, this doesn’t promote consistency in the NERC Documents. We recommend the drafting team develops a SAR to help initiate the proper alignment of the Functional Model with the other two NERC Documents since it’s referenced in the current SAR. However, if the drafting team feels that there is no need to align the Functional Model, we would recommend removing the use of the Functional Model from all NERC Documentation. At its current state, the document has the potential to cause confusion with the interpretation of other defined term or terms referenced in the two NERC Documents (Glossary of Terms and RoP).

The SPP Standards Review Group has concerns in reference to the DP replacing the LSE in MOD-032.

Currently there is not a DP contact to obtain modeling data, so the data might not be submitted to SPP in a timely manner or at all. SPP would need time to establish the DP contacts.

Also, we feel that there may be jurisdictional issues pertaining to an entity sharing modeling data if they aren’t registered with NERC as a DP.

Finally, there is a concern in reference to the DP not providing the modeling data on the behalf of the LSE due to the perception they aren’t responsible to provide the LSE Modeling data.

The SPP Standards Review Group would ask that the drafting team takes into consideration the addition of the Underfrequency Load Shedding (UFLS) - only DPs to MOD-32-1 Standard Applicability Section. We feel that this entity may have an impact on the role and responsibilities of providing data to help create productive models.

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

Answer	
Document Name	
Comment	
<p>Functional category removal has the potential to impact the newly designated applicable entity for the standard. If applicable, how will the impact be mitigated? Should this be taken into account as part of a revised implementation plan?</p>	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	
Document Name	
Comment	
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Likes	0
Dislikes	0
Response	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	
Document Name	

Comment

Functional category removal has the potential to impact the newly designated applicable entity for the standard. If applicable, how will the impact be mitigated? Should this be taken into account as part of a revised implementation plan?

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