

## Consideration of Comments

**Project Name:** 2017-07 Standards Alignment with Registration SAR

**Comment Period Start Date:** 8/1/2017

**Comment Period End Date:** 8/30/2017

**Associated Ballots:**

There were 19 sets of responses, including comments from approximately 64 different people from approximately 52 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? 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 Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					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? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.**

**Summary Responses:**

The SAR Drafting Team received comments requesting clarity as to why more than one SAR was being proposed for Project 2017-07 Standards Alignment with Registration.

- The SAR Drafting Team has merged the two SARs into a single SAR for Project 2017-07.

Several commenters requested that the SAR Drafting Team expand the scope of the project and include in the SAR a review of the NERC Glossary of Terms and to validate that the terms *Interchange Authority (IA)*, *Load-Serving Entity (LSE)*, and *Purchasing-Selling Entities (PSE)* are appropriate and align with the standards in which they are used. In addition, there were comments related to the definition of Underfrequency Load Serving (UFLS)-only Distribution Providers (DPs).

- The SAR Drafting Team considered these comments but does not agree with changing the SAR to include a review of the NERC Glossary of Terms for IA, LSE and PSE. The LSE, IA, and PSE will continue to be referenced in resource documents, etc., as the function does not go away.
- UFLS-only DPs are a limited number of entities who have UFLS obligations, but who otherwise do not meet any of the registration criteria of a DP. While the term “Distribution Provider” is defined in the NERC Glossary of Terms, there is no reason to define UFLS-only DPs as a unique term, as it is only a subset of the functional registration DP.

To address comments received, the SAR Drafting Team has updated the language of the SAR, which now states, “remove or replace references to the Load-Serving Entity (LSEs) by either the Distribution Provider (DP), the Balancing Authority (BA), or other appropriate functional entity.”

**Thomas Foltz - AEP - 3,5**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

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**

**Nicolas Turcotte - Hydro-Québec TransEnergie - 1**

**Answer** No

**Document Name**

**Comment**

We agree with the proposed objectives of the SAR but believe the scope should be expanded to include a review of the Glossary. (The SAR form needs an additional box check in the “SAR Type” i.e. “Add, Modify or Retire a Glossary Term”.)

The terms Interchange Authority (IA), Load-Serving Entity (LSE) and Purchasing-Selling Entities (PSE) are used in NERC Glossary definitions and NERC should make sure that these definitions are still valid and aligned with the standards in which they are used.

For example, the NERC Glossary uses “Interchange Authority” in the definitions of Arranged Interchange, Confirmed Interchange, and Request for Interchange and these terms as well as the definition of “Interchange Authority” itself do not necessarily align with the project on the INT standards where the BA took on the IA’s reliability tasks.

Also LSE is used in the definitions of Energy Emergency, Interruptible Load, DSM, etc

Likes 0

Dislikes 0

**Response**

<b>Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<ol style="list-style-type: none"> <li>1. We believe references to the reassignment of Load-Serving Entity (LSE) requirements should be broader instead of limiting the selection to either the Distribution Provider (DP) or the Balancing Authority (BA). During previous standard development projects, other functions (e.g. Resource Planner) were identified as applicable instead of DPs and BAs. Moreover, the objective should allow this Standard Drafting Team to revise the requirement to align with those functions' capabilities. 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 revising the objective to read "references to LSE requirements will be reassigned to applicable functions and revised to align with those functions' capabilities."</li> <li>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.</li> </ol>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>AZPS requests clarification to ensure that the directives to the SDT are clear and definitive. To eliminate ambiguity, AZPS recommends that the following sentence be revised as indicated below.</p>	

“The edits include updates to the BAL, CIP, FAC, INT, IRO, MOD, NUC, and TOP family of standards to:

1. Delete remove the references to Purchasing-Selling Entities (PSEs) and Interchange Authorities (IAs);
2. Revise references to the Load-Serving Entity (LSEs) by replacing these references with:
  1. either the Distribution Provider (DP) or the Balancing Authority (BA);
  2. Distribution Provider; or
  3. Balancing Authority.”

In addition, AZPS requests clarification regarding how the determination will be made to replace LSEs with either DP or BA, DP, or BA. For example, will the SDT be required to establish criteria to determine if LSE is replaced with a DP, BA, Option for Either or None (removal)?

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**

Thank you for your comment.

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

**Answer** Yes

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

Likes	0
Dislikes	0
<b>Response</b>	
Julie Hall - Entergy - 6, Group Name Entergy/NERC Compliance	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Daniel Grinkevich - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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:**

**Summary Responses:**

Based on comments received, the SAR Drafting Team has updated the language of the SAR, which now states, "remove or replace references to the Load-Serving Entity (LSEs) by either the Distribution Provider (DP), the Balancing Authority (BA), or other appropriate functional entity."

There were comments received stating concerns with the proposed change to the Applicability Section in PRC-005-6. The Draft 1 SAR proposed to replace DP with UFLS-only DPs, creating a possible conflict resulting in Section 4.1 with Section 4.2.1.

- The SAR Drafting Team agreed with the comments received and updated the language in the SAR by deleting "removing UFLS-only DP" and changing the language to "adding UFLS-only DP."

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

**Answer**

**Document Name**

**Comment**

1. The SAR type should include the retirement of a standard, as there is a possibility that all requirements of a standard could be retired as part of this project.
2. The unique characteristics of the BES facilities that may be impacted by this proposed standard development project should be identified as "None" instead of not applicable.
3. We believe two Reliability Principles are applicable to this standard development project. This project will revise requirements for applicable entities that plan and operate interconnected bulk power systems in a coordinated manner. Moreover, the project will revise requirements applicable to identifying information that is necessary for the planning and operation of interconnected bulk power systems and its availability for responsible entities.
4. We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comments.

1. All of the proposed standards within the SAR have applicable entities in addition to the PSE, LSE and IA.
2. Change made
3. Updated in SAR

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

**Answer**

**Document Name**

**Comment**

Based on the proposed changes to the Applicability Section of PRC-005, Tri-State believes PRC-004 applicability should also be updated to replace Distribution Provider with UFLS-only DP. As currently written in the SAR, we believe the PRC-005 applicability would become inconsistent with the current version of PRC-004.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Texas RE is concerned with the proposed change to the Applicability section in Reliability Standard PRC-005-6. The SAR proposes to replace Distribution Provider (DP) with Underfrequency Load Shedding (UFLS)-only DPs. This could result in section 4.1 conflicting with section 4.2.1, which includes Protection Systems and Sudden Pressure Relaying that are installed for the purpose of detecting Faults on BES elements. This could include DPs that do not have UFLS.

Likes	0
Dislikes	0
<b>Response</b>	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	
Answer	
Document Name	
<b>Comment</b>	
<p>a) 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> <p>b) Alignment category number 2 should include the currently existing, in progress, standards revision as part of the regional reliability standards revision driven by NPCC. Specifically NERC should coordinate with NPCC the revision of the standard PRC-006-NPCC-2 Automatic Underfrequency Load Shedding. For example Requirement Part 16.3 “Have compensatory load shedding, as provided by a Distribution Provider or Transmission Owner that is adequate to compensate for the loss of their generator due to early tripping.” should now be transferred to Underfrequency Load Shedding (UFLS)-only Distribution Provider (DP). In other words the NERC revision of standards should be coordinated with the regional entities to avoid having conflicting regulatory requirements in effect at the same time (i.e. different owners for the same regulatory requirement)</p> <p>c) There is a potential risk for conflicting regulatory requirements due to different timelines for the Periodic Review of various standards.</p> <p>The SAR form should check an additional box in the “SAR Type” i.e. “Add, Modify or Retire a Glossary Term”. The terms Interchange Authority (IA), Load-Serving Entity (LSE) and Purchasing-Selling Entities are used in NERC Glossary definitions and the SAR or Standard drafting team should make sure that these definitions are still valid. For example, the NERC Glossary uses “Interchange Authority” in the definitions of Arranged Interchange, Confirmed Interchange, and Request for Interchange and these terms as well as the definition of “Interchange Authority” itself do not necessarily align with the project on the INT standards where the BA took on the IA’s reliability tasks. Also LSE is used in the definitions of Energy Emergency, Interruptible Load, DSM, etc.</p>	

Likes	0
Dislikes	0
<b>Response</b>	
<b>David Ramkalawan - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>OPG is of the opinion that:</p> <ol style="list-style-type: none"> <li>1. 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?</li> <li>2. Alignment category number 2 should include the currently existing, in progress, standards revision as part of the regional reliability standards revision driven by NPCC. Specifically NERC should coordinate with NPCC the revision of the standard PRC-006-NPCC-2 Automatic Underfrequency Load Shedding. For example Requirement Part 16.3 “Have compensatory load shedding, as provided by a Distribution Provider or Transmission Owner that is adequate to compensate for the loss of their generator due to early tripping.” should now be transferred to Underfrequency Load Shedding (UFLS)-only Distribution Provider (DP). In other words the NERC revision of standards should be coordinated with the regional entities to avoid having conflicting regulatory requirements in effect at the same time (i.e. different owners for the same regulatory requirement)</li> <li>3. There is a potential risk for conflicting regulatory requirements due to different timelines for the Periodic Review of various standards.</li> </ol>	
Likes	0
Dislikes	0
<b>Response</b>	

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

The SPP Standards Review Group recommends that the drafting team review the definitions of the terms ‘Distribution Provider’ and ‘Balancing Authority’ in the NERC Glossary of Terms, RoP (Appendix 2) and the Functional Model. Through our observation, the definitions are properly aligned 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.

BA (Glossary of Terms and RoP) - The responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.

BA (Functional Model) - The functional entity that integrates resource plans ahead of time, maintains generation-load-interchange-balance within a Balancing Authority Area, and contributes to Interconnection frequency in real time.

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 terms referenced in the two NERC Documents (Glossary of Terms and RoP).

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**

**Document Name**

**Comment**

Within the Detailed Description section of the SAR, the clean-up effort of the standards are divided into three categories: **(1)** removal of the retired function and replacement by another function, **(2)** removal of the deregistered functional entities and their applicable requirements/references, and **(3)** initiatives that can address RBR updates through the periodic review process.

The second sentence of the Detailed Description states “The edits include updates to the BAL, CIP, FAC, INT, IRO, MOD, NUC, and TOP family of standards to remove the references to Purchasing-Selling Entities (PSEs) and Interchange Authorities (IAs); references to the Load-Serving Entity (LSEs) will be replaced by either the Distribution Provider (DP) or the Balancing Authority (BA).”

As currently written, the second sentence of the Detailed Description indicates removing and replacing references to the LSE with the DP as the only change that will be given consideration with respect to the LSE-related changes (Category 1 of the clean-up effort). It does not contemplate consideration of simply removing the applicable requirements with respect to and references to the LSE within relevant standards (Category 2 of the clean-up effort). To correct this misalignment or potential conflict within the Detailed Description, we recommend that the second sentence of the Detailed Description be revised to state:

“The edits include updates to the BAL, CIP, FAC, INT, IRO, MOD, NUC, and TOP family of standards to remove the applicable requirements with respect to and references to Purchasing-Selling Entities (PSEs), Interchange Authorities (IAs), and Load Serving Entities (LSEs) and their applicable requirements/references; or with respect to LSEs, remove the applicable requirements with respect to and replace the references to the LSE with either the Distribution Provider (DP) or the Balancing Authority (BA) or another functional role if appropriate.”

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**

**Michael Jones - National Grid USA - 1,3,5**

**Answer**

**Document Name**

**Comment**

Should PRC-005 be applicable to Distribution Providers and the sub-set UFLS-only DP? For PRC-005, it may not be appropriate to replace Distribution Providers with the more limiting "UFLS-only DP" applicability.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

None

Likes 0	
Dislikes 0	
<b>Response</b>	