

Comment Report

Project Name: Revisions to the NERC Standard Processes Manual
Comment Period Start Date: 6/25/2018
Comment Period End Date: 8/9/2018
Associated Ballots: NERC Standard Processes Manual Sections 2.1, 3.7, 6, 7, 8 & 11 AB 2 OT

There were 30 sets of responses, including comments from approximately 83 different people from approximately 64 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the revisions to Section 4.4.2 of the SPM to clarify that drafting teams may develop and post supporting technical documents to help explain or facilitate understanding of draft Reliability Standard(s) or associated element(s)?
2. Do you agree that the proposed reorganization of Sections 4.12-4.14 clarifies the existing process for posting and balloting Reliability Standards and responding to comments?
3. Do you have any other comments concerning Section 4.0 of the SPM?
4. Do you agree that the revisions to Section 6.0 of the SPM clarify roles and responsibilities with respect to the conduct of field tests?
5. Do you have any other comments concerning Section 6.0 of the SPM?
6. Do you agree with the revisions to Section 7.0 of the SPM regarding the approval and rejection of interpretation requests?
7. Do you agree that Interpretations should continue to be posted for comment and ballot in the same manner as Reliability Standards?
8. Do you have any other comments concerning Section 7.0 of the SPM?
9. Do you agree that the revisions to Section 9.0 of the SPM clarify that variances for the Quebec Interconnection may be developed through the NPCC regional standard development process?
10. Do you agree that the revisions to Section 11.0 of the SPM clarify the scope and applicability of this section?
11. Do you agree that no separate Standards Committee authorization should be required to post a supporting technical document developed by the standard drafting team alongside the approved Reliability Standard on the NERC website?
12. Do you have any other comments concerning Section 11.0 of the SPM?
13. Do you have any comments regarding the updates and clarifications proposed for the first time in this posting of the SPM, including the revisions in Sections 1.0, 2.0, 3.0, 10.0, 13.0, and 16.0?
14. Do you have any other comments regarding revisions to any SPM section not specifically identified above?

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Brandon McCormick	Brandon McCormick		FRCC	FMPA	Tim Beyrle	City of New Smyrna Beach Utilities Commission	4	FRCC
					Jim Howard	Lakeland Electric	5	FRCC
					Lynne Mila	City of Clewiston	4	FRCC
					Javier Cisneros	Fort Pierce Utilities Authority	3	FRCC
					Randy Hahn	Ocala Utility Services	3	FRCC
					Don Cuevas	Beaches Energy Services	1	FRCC
					Jeffrey Partington	Keys Energy Services	4	FRCC
					Tom Reedy	Florida Municipal Power Pool	6	FRCC
					Steven Lancaster	Beaches Energy Services	3	FRCC
					Mike Blough	Kissimmee Utility Authority	5	FRCC
					Chris Adkins	City of Leesburg	3	FRCC
					Ginny Beigel	City of Vero Beach	3	FRCC
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Southern Company - Southern	Katherine Prewitt	1		Southern Company	Scott Moore	Alabama Power Company	3	SERC

Company Services, Inc.					Bill Shultz	Southern Company Generation	5	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
Southwest Power Pool, Inc. (RTO)	Matthew Harward	2	MRO,SERC	SPP Standards Review Group	Matthew Harward	Southwest Power Pool, Inc.	2	MRO
					Shannon Mickens	Southwest Power Pool, Inc.	2	MRO
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Helen Lainis	IESO	2	NPCC
Michael Schiavone	National Grid	1	NPCC					

					Michael Jones	National Grid	3	NPCC
					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Sean Cavote	PSEG	4	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					David Kiguel	Independent	NA - Not Applicable	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Caroline Dupuis	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable

					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
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 revisions to Section 4.4.2 of the SPM to clarify that drafting teams may develop and post supporting technical documents to help explain or facilitate understanding of draft Reliability Standard(s) or associated element(s)?

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer No

Document Name

Comment

The revisions to Section 4.4.2 clarify what drafting teams may develop and post. However, the draft text introduces confusion regarding the term “technical rationale.” Consider the draft text within the context of the proposed description of a “Reference” document, as provided in Section 11.1: Types of Supporting Technical Documents, “Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.

Southern notes that “technical rationale” is distinct and not the same as “technical information.” The draft text is confusing with respect to whether the SPM revision team is attempting to (1) allow “technical rationale” to stand alone as a separate type of document or (2) imply the inclusion of “technical rationale” in the aforementioned description of a “Reference” document. If the intent is to allow “technical rationale” to stand alone, the SPM revision team should consider the following suggested text, “These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team’s technical rationale, technical information, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element...” This suggested language does not conflate “technical rationale” with “technical information” as provided in Section 11.1.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Section 4.4.2 is unclear about what the process is for commenting on or challenging such postings. The ability to challenge posted supporting technical documents is critical since per Section 11.0 establishes that supporting technical documents posted by the Standards Drafting Teams may be posted along side approved Standards without further approvals. As such they become a defacto part of the Standard development record used going forward to interpret the Standard.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5**Answer** Yes**Document Name****Comment**

When posting supporting technical documents is believed to be necessary, care should be taken to afford industry sufficient opportunity to review and develop meaningful input. Such documentation is often highly technical and voluminous, and the turnaround time provided for informal comment periods may not be sufficient, especially when accompanying drafts of new or revised standards.

Likes 1 Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response**Chris Scanlon - Exelon - 1****Answer** Yes**Document Name****Comment**

Exelon encourages NERC / TRAG to develop guidance and a template that will facilitate a consistent format for Technical Rational.

Likes 1 Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC****Answer** Yes**Document Name****Comment**

The supporting documents providing rationale and or clarification independent of the standard itself is acceptable. The concern BHP has, is the ready accessibility of the supporting documents.

Likes 1 Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

It is very helpfull to clairfy the standard wheen needed

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

If said supporting technical documents are developed by the drafting team and included with the standard than NERC should require Regional Entities to consider said guidance during audit. Thus, Regional Entities should not just be auditing to the letter of the standard if the drafting team developed other guidance.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

If said supporting technical documents are developed by the drafting team and included with the standard then NERC should require Regional Entities to consider said guidance during audit. Thus, Regional Entities should not just be auditing to the letter of the standard if the drafting team developed other guidance.

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

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

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

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 Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

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

Scott McGough - Georgia System Operations Corporation - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vine - California ISO - 2	
Answer	
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	

2. Do you agree that the proposed reorganization of Sections 4.12-4.14 clarifies the existing process for posting and balloting Reliability Standards and responding to comments?

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

Section 4.12 is not sufficiently clear whether the test for conclusion of the process is intended to be triggered by all three factors, or if satisfaction of one or more is sufficient to terminate the drafting process. If the intent is for any one of the factors to trigger conclusion of the process, the SPP Standards Review Group ("SSRG") suggests the following edit or something similar in form:

"The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if the Standards Committee determines that the drafting team cannot develop a Reliability Standard that meets at least one of the following factors: (i) the proposed Reliability Standard is within the scope of the associated SAR, (ii) the proposed Reliability Standard is sufficiently clear to be enforceable, or (iii) the proposed Reliability Standard achieves the requisite weighted Segment approval percentage."

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

The proposed changes helps with organization

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3

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

Dennis Sismaet - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment

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 Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Glen Farmer - Avista - Avista Corporation - 1,3,5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

3. Do you have any other comments concerning Section 4.0 of the SPM?

John Seelke - LS Power Transmission, LLC - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Glen Farmer - Avista - Avista Corporation - 1,3,5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

Likes 0

Dislikes 0

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

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Donald Sievertson - Los Angeles Department of Water and Power - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**David Ramkalawan - Ontario Power Generation Inc. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

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

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vine - California ISO - 2	
Answer	
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	

4. Do you agree that the revisions to Section 6.0 of the SPM clarify roles and responsibilities with respect to the conduct of field tests?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Sections 6.1.2 and 6.1.4 addressing compliance waivers need to clarify that the appropriate Regional Entity will be included in any waiver notifications. This clarification is appropriate since by-in-large, the Regional Entity has the lead role in compliance monitoring and would need to know about Field Test-related compliance waivers.

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

A simple reference to either the SAR Drafting Team or a Standard Drafting Team could be very helpful to clarify roles and responsibilities with regards to conduct of field tests.

It is not clear whether the “drafting team” mentioned in Section 6, *et seq.*, refers to the SAR Drafting Team or the Reliability Standard Drafting Team and this has caused confusion during review of the proposed changes to the SPM. For example, the current draft of Section 6.0 contains two potentially conflicting terms. First, the section states that “[d]rafting teams are not required to...conduct a field test to validate a Reliability Standard.” However, the section then states later that a field test can be initiated by a SAR. If a Standards Drafting Team is not required to perform a field test, may a Standard Drafting Team ignore the direction of a SAR that initiates a field test? The SSRG recommends the following edit to clarify the process:

Strike, modify, and move the following sentence to the end of Section 6.0: “Unless a field test is initiated by a SAR, a Standard Drafting Team is not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.”

This general comment could apply to all references to “drafting team” contained in the SPM.

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPPA

Answer	No
Document Name	
Comment	
<p>FMPA agrees with the following comments from LG&E/KU:</p> <p>Louisville Gas and Electric Company and Kentucky Utilities Company (LG&E/KU) strongly supports the proposed revisions to section 6.1.2 to require the NERC Compliance Monitoring and Enforcement Program Staff to notify the affected Registered Entities of all compliance waiver determinations. However, to eliminate any ambiguity and clearly articulate this requirement, we suggest modifying the last sentence to: “Staff shall notify the affected Registered Entities of all compliance waiver determinations <i>in writing at least thirty (30) days prior to the effective date of the determination.</i>”</p>	
Likes	0
Dislikes	0
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2	
Answer	No
Document Name	
Comment	
<p>6.1.1 “Prior to the drafting team conducting a field test, the drafting team must shall: (i) first receive approval from the lead NERC technical committee. Second, the drafting team must; and (ii) then receive approval from the Standards Committee.”</p> <p>This is the first mention the SC is involved with the Field Test. Does SC approval apply for both SAR and Standards field tests? The SC does not approve SARs, so does a SAR team need approval of SC to proceed with a field test if the SAR is not ready for SC review and acceptance? It may be better to outline the SAR field test approval process and Standards field test approval process if there needs to be differences.</p> <p>6.1.3 “During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:”</p> <p>“NERC” should be removed from this section. The field test is under the direction of a technical committee with the expertise to assess reliability risks if there are any. It is unclear how “NERC” or who in “NERC” beyond the technical committee would also be allowed to assess the reliability risk.</p> <p>Also, if an entity impacted by the field test finds that a field test is creating an imminent reliability threat, this manual may be interpreted as one cannot deviate from the test until such time the technical committee acts. There should be a reference/reminder here that the operator/registered entity involved in a field test must always exercise its authority to ensure grid reliability regardless of the terms of a field test.</p>	
Likes	0
Dislikes	0
Response	

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

Section 6.1.3 appears to provide NERC staff the ability to unilaterally stop or modify a field test. This authority should continue to reside in the stakeholder committees.

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

Louisville Gas and Electric Company and Kentucky Utilities Company (LG&E/KU) strongly supports the proposed revisions to section 6.1.2 to require the NERC Compliance Monitoring and Enforcement Program Staff to notify the affected Registered Entities of all compliance waiver determinations. However, to eliminate any ambiguity and clearly articulate this requirement, we suggest modifying the last sentence to: "Staff shall notify the affected Registered Entities of all compliance waiver determinations *in writing at least thirty (30) days prior to the effective date of the determination.*"

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

Despite the provision in some cases for compliance waivers, it is still unclear from this section if field tests are mandatory, or instead, optional. It does state that the lead NERC technical committee will "identify potential test participants", but no insight is given if those identified are obligated in any way.

The text "The drafting team shall perform the field test" should be replaced by "The drafting team shall oversee and administrate the field test" as the

drafting team members are not themselves performing the field tests.

Given the stated purpose and intent of field tests, it is not clear how (as stated in Section 6.1.4) a field test could or should ever "extend beyond the period of standard development." AEP disagrees with its inclusion and its allowance in Section 6.2 which includes "if the field test will continue beyond standard development."

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer

Yes

Document Name

Comment

It helps with organization

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3

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	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steve Floyd - Granite Shore Power - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

5. Do you have any other comments concerning Section 6.0 of the SPM?

John Seelke - LS Power Transmission, LLC - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Glen Farmer - Avista - Avista Corporation - 1,3,5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Kelsi Rigby - APS - Arizona Public Service Co. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Dennis Sismaet - Northern California Power Agency - 5,6****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**David Ramkalawan - Ontario Power Generation Inc. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

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

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Texas RE inquires as to whether or not these Section 6 changes apply for Regional Reliability Standards.

Texas RE recommends including a general statement in the Standard Processes Manual pertaining to the official record of the Standard which should include the Field Test portion.

In Section 4.0 "Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard", the flow diagram on page 15 does not reflect the changes proposed in Section 6 (e.g., Field Test before a SAR is finalized). Texas RE noticed there is no mention of Field Testing in Section 4 other than in the introductory paragraph. Should there be?

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

We do not agree with inclusion of "NERC or" in Section 6.1.3, which says:

"During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:"

Filed tests are approved by the lead standing committee and the Standards Committee. Staff or NERC as a Corporation does not appear to be assigned any responsibility or authority in the approval process. When a field test is being conducted, any reliability concerns are detected or assessed by the entities conducting the field test. NERC or its staff does not appear to be involved in the actual conduct of the field test.

Therefore, we suggest to remove (NERC or) in the leading sentence of Section 6.1.3, and insert language to reflect the need for the entities conducting the field test to report to the leading standing committee overseeing the field test the reliability concerns, and request termination of the field test.

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

Yes

Document Name

Comment

Section 6.1.3 appears to provide for the ability for NERC staff unilaterally to stop or modify the field test. It is not clear why the language “if NERC [staff] or” was inserted into this section of the revised draft since the last posting.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

Yes

Document Name

Comment

Comments on the previous ballot of this section indicated that stakeholders would like to have specific timeframes for determinations of compliance waivers. A defined timeframe would provide transparency and certainty to field trial participants. This would not delay the process but rather provide a defined framework that stakeholders can rely upon to ensure that no reliability or compliance gaps are created during the field test process. Timeframes should be established for NERC to respond to stakeholders, especially on issues with compliance related to field testing a new concept. Dominion Energy recommends a 30 day timeframe.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

We do not agree with inclusion of “NERC or” in Section 6.1.3, which says: *“During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall.”*

Filed tests are approved by the lead standing committee and the Standards Committee. Staff or NERC as a Corporation does not appear to be assigned any responsibility or authority in the approval process. When a field test is being conducted, any reliability concerns are detected or assessed by the entities conducting the field test. NERC or its staff does not appear to be involved in the actual conduct of the field test.

Therefore, we suggest to remove (NERC or) in the leading sentence of Section 6.1.3, and insert language to reflect the need for the entities conducting the field test to report to the leading standing committee overseeing the field test the reliability concerns, and request termination of the field test.

Likes 0

Dislikes 0

Response	
<p>Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA</p>	
Answer	Yes
Document Name	
Comment	
<p>FMPA agrees with the following comments submitted by Dominion:</p> <p>Comments on the previous ballot of this section indicated that stakeholders would like to have specific timeframes for determinations of compliance waivers. A defined timeframe would provide transparency and certainty to field trial participants. This would not delay the process but rather provide a defined framework that stakeholders can rely upon to ensure that no reliability or compliance gaps are created during the field test process. Timeframes should be established for NERC to respond to stakeholders, especially on issues with compliance related to field testing a new concept. Dominion Energy recommends a 30 day timeframe.</p>	
Likes	0
Dislikes	0
Response	
<p>Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group</p>	
Answer	Yes
Document Name	
Comment	
<p>Section 6.1.2 should be clarified: (i) to require that necessary waivers be granted prior to an entity's participation in the field test; and (ii) to the extent an entity is not granted a waiver, an acknowledgement that participation in the field test will not be a factor in determining the entity's compliance with a currently effective standard. Because the decision to determine whether waivers are granted are not subject to specific criteria and are within the sole determination of NERC, there should be no additional compliance risk if no waiver is granted but later a violation is identified by the Compliance Enforcement Authority ("CEA").</p> <p>Additionally, although a waiver may be granted there may be unforeseen risks to the reliability of the Bulk Power System and, therefore, the SPM should contain a provision to allow the operator/registered entity involved in a field test to also be authorized to exercise its authority to ensure grid reliability regardless of the terms of a field test. The SSRG recommends the following edit to the language:</p> <p>"During the field test, if NERC, the lead NERC technical committee overseeing the field test, or the Registered Entity participating in the field test, determines that the field test is creating a reliability risk to the Bulk Power System, either party shall:</p> <ul style="list-style-type: none"> · stop the activity; · inform the Standards Committee that the activity was stopped; and · if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the 	

drafting team.

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

6. Do you agree with the revisions to Section 7.0 of the SPM regarding the approval and rejection of interpretation requests?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

It provides a guideline for approval

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
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

Dennis Sismaet - Northern California Power Agency - 5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment

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 Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

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

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Seelke - LS Power Transmission, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vine - California ISO - 2	
Answer	
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	

7. Do you agree that Interpretations should continue to be posted for comment and ballot in the same manner as Reliability Standards?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer Yes

Document Name

Comment

LSPT believes that Section 7: Process for Developing an Interpretation should be changed by modifying the NERC Rules of Procedure (“ROP”) definition of “Interpretation” to include all mandatory and enforceable components of a Reliability Standard. In addition, Section 7 does not require the NERC Staff to respond to an Interpretation request within a defined timeframe. The SPM team should clarify whether it believes Section 8 applies to a NERC Staff delay in responding to an Interpretation request.

Mandatory and Enforceable Components of a Reliability Standard

The last paragraph in Section 2.5 of the proposed SPM clean version states:

“The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates.”

The definition of “Interpretation” in Appendix 2 of the NERC’s ROP is excerpted below. It is not a NERC Glossary term.

“Interpretation” means an addendum to a Reliability Standard, developed in accordance with the NERC Standard Processes Manual and approved by the Applicable Governmental Authority(ies), that provides additional clarity about one or more Requirements in the Reliability Standard.

Section 7 addressed only one of the three mandatory elements of a Reliability Standard. There is no other forum within NERC that allows a Registered Entity to get the same clarity for the applicability or the effective dates associated with a standard. If the definition of “Interpretation” was changed to include both the “applicability” and “effective date” of a standard, then those requests could be addressed in proposed Section 7 of the SPM.

Changing the Definition of “Interpretation”

A definition change requires an amendment to Appendix 2 of ROP, which may be done per Section 1400. Section 1401, excerpted below, addresses who may initiate a change to the ROP.

1401. Proposals for Amendment or Repeal of Rules of Procedure

In accordance with the Bylaws of NERC, requests to amend or repeal the Rules of Procedure may be submitted by (1) any fifty Members of NERC,

which number shall include Members from at least three membership Sectors, (2) the Member Representatives Committee, (3) a committee of NERC to whose function and purpose the Rule of Procedure pertains, or (4) an officer of NERC.

Per NERC's [Organization Chart](#), the Standards Committee may propose a change per Section 1401, item (3). The SPM team should develop a new definition of "Interpretation" concurrent and post it for comments in a subsequent draft SPM that modifies the 6/25/18 posting. The next posting should also modify Section 7 to accommodate the new definition. Comments should be requested on both the new definition and accompanying Section 7 changes.

While a new "Interpretation" definition would be proposed by the Standards Committee under the Section 1400 process, its effective date should be tied to the effective date of the approval of a revised SPM that uses the new definition. Both SPM changes and the new ROP definition would be submitted by the Standards Committee to the NERC Board for its approval, and, if approved, by NERC to Applicable Governmental Authorities. This may be accomplished in a single filing.

NERC Staff Response to an Interpretation Request

In Section 7, NERC Staff receives all Interpretation requests and make a recommendation to the Standards Committee to accept or reject the request. Section 7 has no timetable for action by NERC Staff. Under Section 8.0: Process for Appealing an Action or Inaction, inactions can be appealed at any time. Does the SPM team consider Section 8 as possible remedy for inaction by NERC Staff on an Interpretation request? The SPM team should clarify whether Section 8 applies to inaction by NERC staff delay in responding to an Interpretation request. If it does not apply, the SPM team should explain its reasoning.

Likes	0
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Dislikes	0
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Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer	Yes
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Document Name	
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Comment

It deffinatly is a usefull tool

Likes	0
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Dislikes	0
----------	---

Response

Chris Scanlon - Exelon - 1

Answer	Yes
--------	-----

Document Name	
---------------	--

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

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

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

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

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

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

Scott McGough - Georgia System Operations Corporation - 3

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

8. Do you have any other comments concerning Section 7.0 of the SPM?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**David Ramkalawan - Ontario Power Generation Inc. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Dennis Sismaet - Northern California Power Agency - 5,6****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Marty Hostler - Northern California Power Agency - 5,6****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name** Dominion**Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Kelsi Rigby - APS - Arizona Public Service Co. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

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

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
How does NERC propose to post/notice FERC approved Interpretations to ensure transparency and notice to responsible entities? The SPM provides that approved Interpretations "shall stand" until incorporated into future SARs or the standard is retired, but does not provide direction how the Interpretation will be posted or tied to the applicable Reliability Standard. The SSRG recommends adding clarification and a mechanism to assure transparency.	
Likes 0	
Dislikes 0	
Response	
Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
FMPA agrees with the following comments submitted by LG&E/KU:	
Figure 2: Process for Developing an Interpretation is not referenced in the text of Section 7. In addition to referencing Figure 2 in the text of Section 7, it may be beneficial to number the steps directly in Section 7 to ensure there are no discrepancies between the words of Section 7 and the figure	
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	Yes
Document Name	
Comment	
Figure 2: Process for Developing an Interpretation is not referenced in the text of Section 7. In addition to referencing Figure 2 in the text of Section 7, it may be beneficial to number the steps directly in Section 7 to ensure there are no discrepancies between the words of Section 7 and the figure.	

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Section 7.1
The text "A valid Interpretation may not alter the scope or language of a Requirement" should instead state "A valid Interpretation may not alter the scope, language, or intent of a Requirement."

Section 7.2.2
It is unclear why text was struck regarding the formation of the ballot pool. As the section now reads, it is unclear how or when a ballot pool for the Interpretation request is ever established.

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer

Document Name

Comment

1. Sec 7.2.3

“If an Interpretation drafting team recommends a modification to a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities. The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard is approved or the Interpretation is retired due to a future modification of the applicable Requirement.”

The wording “until it can be incorporated...” should be removed. Although it may be appropriate that the interpretation be incorporated into the standard, it must be done through the open standards development process. The wording can be misunderstood that the industry has no alternative but to incorporate that interpretation into the standard without discussion. If so, it potentially circumvents the ANSI process for modification of an existing standard. If the Board adopts the interpretation team’s interpretation and the SPM language requires the interpretation be incorporated into the standard verbatim, then the industry is denied the opportunity to debate that interpretation through the ANSI process. It should be clearly stated that an interpretation which recommends a SAR to modify a standard is subject to industry approval of the final modifications.

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

9. Do you agree that the revisions to Section 9.0 of the SPM clarify that variances for the Quebec Interconnection may be developed through the NPCC regional standard development process?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

It would seem the last sentence of the fourth paragraph in section 9.1 might also need a minor edit to align with the added second paragraph –

“NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis [**or that wholly contains an Interconnection**], is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.”

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

Agree, it is more relevant

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

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

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Glen Farmer - Avista - Avista Corporation - 1,3,5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

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 Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

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

Scott McGough - Georgia System Operations Corporation - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response	
Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Richard Vine - California ISO - 2	
Answer	
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes	0
Dislikes	0
Response	

10. Do you agree that the revisions to Section 11.0 of the SPM clarify the scope and applicability of this section?

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company is concerned with the introduction of Lessons Learned in the SPM. If adopted, this will be the first instance of Lessons Learned being included in the SPM. The introductory remarks at Section 11.1 state that Lessons Learned can be posted alongside an approved Reliability Standard. It is not clear if this is the only purpose for including Lessons Learned and its description in the SPM. The SPM should clearly state that the SPM is not mandating a process for posting, developing and approving Lessons Learned. Existing statements on NERC's website (https://www.nerc.com/pa/rm/Documents/Lessons_Learned_Quick_Reference_Guide.pdf) provide that Lessons Learned are created through collaboration between NERC, the Regions, and the registered entities. Additional text within the SPM will affirm the purpose.

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer No

Document Name

Comment

FMPA agrees with the comments submitted by LG&E/KU:

In reviewing the comments submitted by the industry, LG&E/KU agrees with other commenters that section 11.2 should have some type of deadline for NERC Staff to make a determination on the criteria. We suggest within 90 days of receipt of the document.

We also believe that it should be the Standard Committee that ultimately decides whether or not a proposed document does or does not meet either the first or second criterion in section 11.2. Therefore, the language should provide that either the SC can override NERC staff's determination or that NERC staff shall make a recommendation to the SC for SC acceptance or rejection. This concept is supported by the proposed language in section 11.3 which states in part that "*NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).*" Since the ultimate decision lies with the SC to approve posting of the document alongside the approved Reliability Standard, the SC should also make the final determinations regarding whether documents should move through the process or not.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

45-days for commenting is more appropriate.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

45-days for commenting is more appropriate.

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

In reviewing the comments submitted by the industry, LG&E/KU agrees with other commenters that section 11.2 should have some type of deadline for NERC Staff to make a determination on the criteria. We suggest within 90 days of receipt of the document.

We also believe that it should be the Standard Committee that ultimately decides whether or not a proposed document does or does not meet either the first or second criterion in section 11.2. Therefore, the language should provide that either the SC can override NERC staff's determination or that NERC staff shall make a recommendation to the SC for SC acceptance or rejection. This concept is supported by the proposed language in section 11.3 which states in part that "*NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).*" Since the ultimate decision lies with the SC to approve posting of the document alongside the approved Reliability

Standard, the SC should also make the final determinations regarding whether documents should move through the process or not.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

No

Document Name

Comment

As provided in our feedback submitted in 2017, AEP once again disagrees with allowing only 30 day to provide comment. Supporting documentation, white papers for example, are often voluminous and/or fairly complex. The existing 45 day comment period is more appropriate than the proposed 30 days, and would allow industry to develop and provide more meaningful input. In its Consideration of Comments feedback last year, the team justified the proposed turnaround time by stating it provides "flexibility to the Standards Committee to direct a longer (or shorter) comment period depending on the nature and technical complexity of the proposed supporting document" and that it ensures "that any document to be posted as a supporting document has received adequate stakeholder review to assess its technical adequacy." We do not see any flexibility or allowance in this section for a longer comment period, and believe that 30 day comments period for these technical documents will not improve either the quality or amount of feedback that the drafting teams receive. This concern is the primary driver behind AEP's decision to vote negative on the proposed revisions.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

it is helpfull with organization

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3

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

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Steve Floyd - Granite Shore Power - 5 - NPCC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Chris Scanlon - Exelon - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

11. Do you agree that no separate Standards Committee authorization should be required to post a supporting technical document developed by the standard drafting team alongside the approved Reliability Standard on the NERC website?

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

This question is confusing and seems to apply to Section 4.4.2 rather than section 11 as the question indicates "...developed by the standard drafting team...". It appears section 11 only applies to documents developed "by which any stakeholder may propose" and not "by the standard drafting team".

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

The Standards Committee should have the ability to make a final determination of the posting of a document. As these are stakeholder developed documents associated with a stakeholder developed Reliability Standard, the final authority to post a document developed under Section 11 should reside with the stakeholder committee designated by the Board of Trustees to oversee the standards development process, the Standards Committee.

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer No

Document Name

Comment

FMPA agrees with the following comments submitted by Dominion:

The Standards Committee should have the ability to make a final determination of the posting of a document. As these are stakeholder developed

documents associated with a stakeholder developed Reliability Standard, the final authority to post a document developed under Setion 11 should reside with the stakeholder committee designated by the Board of Trustees to oversee the standards development process, the Standards Committee.

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer

No

Document Name

Comment

Section 11.3 should be clarified whether the Standards Committee is approving the Supporting Technical Document or just approving the posting of a Supporting Technical Document. Currently, the section only provides that NERC Staff shall present to and recommend the Standards Committee should approve posting of a technical document. Given the title of the section is "Approving a Supporting Technical Document," the SSRG recommends that Section 11.3 be revised to state the Standard Committee approves both the Supporting Technical Document and the posting of such.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Texas RE sees no issue with the SC not authorizing a technical document developed by the SDT, however, Texas RE suggests that the SDT and/or

NERC Staff ensure the documents meet the criteria described in section 11.2.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Per section 11.0 paragraph 3, "...Following approval of the Reliability Standard, those documents may be posted alongside the standard...". Supporting documents should have a defined location for access by entities after approval (e.g. RSAW subpage on NERC webpage).

Likes 1

Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer

Yes

Document Name

Comment

Sec 9.1 *"Where a Regional Entity is not organized on an Interconnection ~~Entity~~ wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC Regional Reliability Standards development procedure."* ~~Entities within~~

It is unclear whether the RE must use its own process or whether a registered entity may request that the NERC process be used instead.

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer

Yes

Document Name

Comment

Agree

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

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

Scott McGough - Georgia System Operations Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2**Answer****Document Name****Comment**

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

Likes 0

Dislikes 0

Response

12. Do you have any other comments concerning Section 11.0 of the SPM?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**David Ramkalawan - Ontario Power Generation Inc. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Dennis Sismaet - Northern California Power Agency - 5,6****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Marty Hostler - Northern California Power Agency - 5,6****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment	
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	
Likes 0	
Dislikes 0	
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

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

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Steve Floyd - Granite Shore Power - 5 - NPCC****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Chris Scanlon - Exelon - 1****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer Yes

Document Name

Comment

In light of previously expressed stakeholder concerns with treatment of technical rationale, Guidelines and Technical Basis, and Implementation Guidance, the statement at the end of Section 11.1 – *Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.* – should be given more prominence and, therefore, relocated to the beginning of Section 11.1. More specifically, Southern’s suggestion is to locate the text immediately after the initial paragraph.

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer Yes

Document Name

Comment

FMPA agrees with the following comments submitted by Dominion:

Stakeholders requested that NERC staff have a definitive timeframe to make any determinations as outlined under Section 11 yet there is currently no language in Section 11 that specifies a timeframe for NERC staff to complete their evaluation of a submitted document. This gap in the process could lead to unintended consequences, including documents not being addressed promptly and stakeholder uncertainty on the status of a Section 11 document. Dominion Energy recommends NERC have a defined 90 day time period to present a determination to the Standards Committee.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

Yes

Document Name

Comment

Stakeholders requested that NERC staff have a definitive timeframe to make any determinations as outlined under Section 11 yet there is currently no language in Section 11 that specifies a timeframe for NERC staff to complete their evaluation of a submitted document. This gap in the process could lead to unintended consequences, including documents not being addressed promptly and stakeholder uncertainty on the status of a Section 11 document. Dominion Energy recommends NERC have a defined 90 day time period to present a determination to the Standards Committee.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

13. Do you have any comments regarding the updates and clarifications proposed for the first time in this posting of the SPM, including the revisions in Sections 1.0, 2.0, 3.0, 10.0, 13.0, and 16.0?

John Seelke - LS Power Transmission, LLC - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer No

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Donald Sievertson - Los Angeles Department of Water and Power - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Daniel Mason - Portland General Electric Co. - 6****Answer**

No

Document Name**Comment**

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 Yes

Document Name

Comment

There is very little background or supporting information provided by NERC regarding the removal of two of the Elements of a Reliability Standard (i.e. *Application guidelines* and *Procedures*) in section 2.5. The revisions proposed in section 2.5 are referred to in the posted *Summary of Proposed Revisions to the NERC Standard Processes Manual – Second Posting* as “reflect[ing] the Standards Committee’s guidance for the development of Technical Rationale documents.” However, the Standards Committee’s documents that address Technical Rationale do not mention the elimination of *Application guidelines* or *Procedures* from the Elements of a Reliability Standard. If NERC is transitioning the *Application guidelines* and *Procedures* to Technical Rationale documents, it may be better for NERC to incorporate the term Technical Rationale as an Element of the Reliability Standard in order to complete the transition from Guidelines and Technical Basis (GTB) to Technical Rationale. Additionally, if Standard Drafting Teams can develop supporting technical documents under section 4.4.2, those documents should be considered an Element of the Reliability Standard.

Likes 1 Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment

The elimination of two elements of the Reliability Standard in Section 2.5 appears to be counter productive and could lead to standard drafting teams not having the ability to provide guidance on the implementation of the Requirements within the Reliability Standard. These elements of the standard could be used by the drafting teams to provide necessary guidance to stakeholders that is not contained within the actual Requirements but are necessary to understand the intent of the team when stakeholders are implementing the Requirements at a programmatic level rather than offering specific examples of how to comply with a Requirement through the Implementation Guidance process. An example is information contained in this element of the Reliability Standard for CIP-002.

Likes 1 Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer Yes

Document Name	
Comment	
<p>FMPA agrees with the following comments submitted by Dominion:</p> <p>There is very little background or supporting information provided by NERC regarding the removal of two of the Elements of a Reliability Standard (i.e. <i>Application guidelines</i> and <i>Procedures</i>) in section 2.5. The revisions proposed in section 2.5 are referred to in the posted <i>Summary of Proposed Revisions to the NERC Standard Processes Manual – Second Posting</i> as “reflect[ing] the Standards Committee’s guidance for the development of Technical Rationale documents.” However, the Standards Committee’s documents that address Technical Rationale do not mention the elimination of <i>Application guidelines</i> or <i>Procedures</i> from the Elements of a Reliability Standard. If NERC is transitioning the <i>Application guidelines</i> and <i>Procedures</i> to Technical Rationale documents, it may be better for NERC to incorporate the term Technical Rationale as an Element of the Reliability Standard in order to complete the transition from Guidelines and Technical Basis (GTB) to Technical Rationale. Additionally, if Standard Drafting Teams can develop supporting technical documents under section 4.4.2, those documents should be considered an Element of the Reliability Standard.</p>	
Likes	0
Dislikes	0
Response	
Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
<p>(1) Section 2.5 should be revised to state that the components of a Reliability Standard must include the following: Applicability, Effective Dates and Requirements; and may include the remaining elements as informational. Such a statement at the beginning of the section would be consistent with the final two sentences of the section that differentiates between mandatory and optional components of the Reliability Standard.</p> <p>(2) For consistency with other flowcharts, Figure 3 in Section 10.7 does not need the explanatory sentence “The following flowchart illustrates...” because the flowchart is already identified as Figure 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue.</p> <p>If the explanatory sentence is retained, for consistency the SSRG suggests adding a similar explanatory sentence to Figures 1, 2 and 4.</p>	
Likes	0
Dislikes	0
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

14. Do you have any other comments regarding revisions to any SPM section not specifically identified above?

Daniel Mason - Portland General Electric Co. - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Katherine Prewitt - Southern Company - Southern Company Services, Inc. - 1, Group Name Southern Company

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon McCormick - Brandon McCormick On Behalf of: Jeffrey Partington, Keys Energy Services, 4; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Neville Bowen, Ocala Utility Services, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Sievertson - Los Angeles Department of Water and Power - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2

Answer No

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No
Document Name	
Comment	
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	
Likes 0	
Dislikes 0	

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Steve Floyd - Granite Shore Power - 5 - NPCC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

John Seelke - LS Power Transmission, LLC - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1

Answer Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC encourages NERC to continue to clarify and document how Technical Rationale may be used by standard drafting teams to capture the intent of the teams while developing requirements, by industry as reference documents once standards are approved, and by the ERO.

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, SERC, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

The SSRG appreciates the time and effort expended by the drafting team to revise the SPM, and supports the effort.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer

Yes

Document Name

Comment

To bring clarity and transparency, we encourage NERC to develop a definition and affirmative language stating what a Technical Rationale is, how it is used, and what authority it holds, if any, in compliance and enforcement.

Likes 1

Utility Services, Inc., 4, Evans-Mongeon Brian

Dislikes 0

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Answer

Yes

Document Name

Comment

Comments

1. It is unclear why “Application guidelines” was deleted on page 6. Does this mean that NERC will not be drafting any more application guidelines?
2. NERC has produced Application Guides in the past, for examples for “Computing Geomagnetically-Induced Current in the Bulk-Power System.” If the definition of “Application Guideline” is deleted, then there is no longer a description of how to employ this guide produced by NERC. Seminole suggests the definitions remain in the Manual while NERC phases out these document types if that is what NERC’s intent it.
3. On page 17, the drafting team deleted the following:
 - i. The team shall document its justification for the Requirements in its proposed Reliability Standard by explaining how each meets these criteria. The standard drafting team shall document its justification for selecting each reference by explaining how each Requirement fits the category chosen.
 - ii. It is unclear why this was deleted and Seminole, without being provided with the reasoning for the deletion, prefers for it to remain. Seminole also reasons that the drafting team should explain their justification for a Requirement.
4. In Section 6.1, language stating that the Standards Committee “may solicit” for volunteers for the field test has been deleted. New language added states that the lead NERC Technical committee shall identify potential field test participants. If selected for a field test, will it be mandatory to participate now? The reasoning for the change is not provided.
5. Seminole reasons that language should be added that any data employed in rulemaking that is gathered from a field test is posted on a public site before any subsequent rulemakings, or part of subsequent rulemaking, similar to the EPA’s process.
6. During a field test, as discussed in Section 6.1, can a selected participant remove themselves at any time during a field test as a participant if they no longer wish to participate, including for reasons that have no impact on the BPS?
7. NERC recently approved a “CMEP Practice Guide” for TOP-001-4 and IRO-002-5. Seminole did not see an explanation for the approval process of this document type and recommends the drafting team add a description of the approval and outreach process for this document type to the Manual as Seminole was completely unaware that this document was being drafted.
8. Under Section 7.2.1 of the Manual, would “Guidelines and Technical Basis” language, such as those appended to the back of the NERC CIP Standards, be considered referenced attachments under the fourth bullet?
9. Seminole has heard that NERC intends to separate all guidelines and interpretations from NERC Standards moving forward as they are “not part of the Standard”. Is this still the intent of NERC, because if so, then this document should clarify that intent better.
10. With the deletion of “Guideline” on page 42, it is unclear how industry should treat the “Guidelines and Technical Basis” language that is appended to the back of multiple CIP Standards. NERC should not delete this language from page 42 until all Guidelines have been retired.
11. In the past, Seminole noticed that the redline for a proposed Standard was different than the proposed clean copy, both posted on the project page. What is NERC’s process for when there are differences in these two documents, e.g., what is actually being “approved”?

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2**Answer****Document Name****Comment**

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

Likes 0

Dislikes 0

Response