

Comment Report

Project Name: 2021 Periodic Review Standing Review Team - Standards Grading
Comment Period Start Date: 6/4/2021
Comment Period End Date: 7/19/2021
Associated Ballots:

There were 9 sets of responses, including comments from approximately 43 different people from approximately 34 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. For [BAL-002-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
2. For [BAL-005-1](#) , do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
3. For [EOP-004-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
4. For [EOP-005-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
5. For [EOP-006-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
6. For [EOP-008-2](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
7. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee no NGrid	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Helen Lainis	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
					Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC					

Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC
Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
Vijay Puran	NYSPPS	6	NPCC
ALAN ADAMSON	New York State Reliability Council	10	NPCC
Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
Brian Robinson	Utility Services	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Jim Grant	NYISO	2	NPCC
John Pearson	ISONE	2	NPCC
Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
Chantal Mazza	Hydro-Quebec	2	NPCC
Michele Tondalo	United Illuminating Co.	1	NPCC

					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

1. For [BAL-002-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Carl Pineault - Hydro-Quebec Production - 1,5

Answer No

Document Name

Comment

No comments.

Selected wrong choice. Answer is Yes.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Questions C2 & Q4: SRP recommends BAL-002-3 R1 be separated into three separate requirements rather than one requirement with 3 sub-parts.

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

Eergy supports and incorporates by reference Edison Electric Institute's (EEI) response to Question 1.

Likes 0

Dislikes 0

Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the BAL-002-3 comments.	
Likes	0
Dislikes	0
Response	
Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee no NGrid	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. For [BAL-005-1](#) , do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Carl Pineault - Hydro-Quebec Production - 1,5

Answer No

Document Name

Comment

No comments

Selected wrong choice. Answer is Yes.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl supports the BAL-005-1 comments.

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

Eergy supports and incorporates by reference Edison Electric Institute's (EEI) response to Question 2.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee no NGrid

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

3. For [EOP-004-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Carl Pineault - Hydro-Quebec Production - 1,5

Answer No

Document Name

Comment

No comments

Selected wrong choice. Answer is Yes.

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Energy supports and incorporates by reference Edison Electric Institute's (EEI) response to Question 3.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

While EEI supports many of the EOP-004-4 comments, we do not support the need for “additional categories of functional entities (created) to ensure sufficient reporting is done at the distribution level.” Although there has been rapid growth of DERs in many areas at the distribution level and this trend will likely continue as a result of FERC Order 2222, the actions are not necessary because Distribution Providers (DPs) are already identified in EOP-004-4 as a Responsible Entity, and the DP should be the entity with the greatest awareness of any reportable event that occurs on their distribution

system. Additionally, owners of DERs are unlikely to meet NERC's registration threshold, but if they did, they would be required to register as a GO/GOP, negating any need for a new category.

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer

Yes

Document Name

Comment

Relative to C2, for requirements R1 and R2, we appreciate the comment and understand its foundation, however, the identified functions (Distribution System Operator, etc.) are not currently part of the registered functions set forth in the Rules of Procedure. The addition of a new functional entity to Rules of Procedure must occur before they can be considered for addition to the applicable sections of EOP-004. For this reason, the referenced comment is beyond the scope of this project.

Likes 0

Dislikes 0

Response

Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee no NGrid

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

4. For [EOP-005-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI offers the following EOP-005-3 comments:

1. EEI does not support the addition of a new subpart to Requirement R1 that would include the following: “Load enabled with Load Shedd (UFLS) devices and setpoint frequencies”. While this change could provide some marginal value, we are unaware of a sufficient reliability benefit to the blackstart processes to justify this change. Entities need flexibility because most restoration situations are fact specific and defining specific UFLS devices could impede restoration efforts. Moreover, the purpose of UFLS systems is to stave off conditions that might lead to instability or collapse; not contribute to restoration or otherwise impede in the restoration process after a regional or areawide collapse.
2. EEI does not support adding a dual fuel capability subpart to Requirement R1. If the TOP needs this information, the information can be obtained through data specification/requests processes already defined in TOP-003.
3. The existing 90-day reporting timeframe after identifying “any unplanned permanent BES modification” is not too long or otherwise unjustified. On the contrary, validating, assessing, and developing alternatives to a TOPs restoration plan is not an inconsequential effort and the time allowed should not be shortened.
4. EEI supports the NERC comment suggesting that R7 should be modified to require the testing of all fuel types of a blackstart resources.
5. EEI does not support proposed changes to R11, because the term “Blackstart Resource Agreements” is clear.
6. EEI supports NERC’s suggestion to add “the type of unit and fuel type[s]” to R14, subpart 14.1.

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Eergy supports and incorporates by reference Edison Electric Institute’s (EEI) response to Question 4.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer No

Document Name	
Comment	
No comments	
Selected wrong choice. Answer is Yes.	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3,4	
Answer	Yes
Document Name	
Comment	
Relative to C3, for requirement R1, we believe the requested additions are already addressed in R1.6 and R1.8; and that adding an additional requirement would be an administrative burden. Additionally, relative to the time period comments set forth for requirement R4, we suggest that 30 days is too short to redraft the applicable plans and finalize them for submission to an RC. For this reason, we would support retaining the 90 day requirement or discussing reduction to 60 days.	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
EOP-005-3 R1	
RE: C3: This single Requirement has three requirements:	
1. Develop a Restoration Plan	
2. Implement the Plan following a Disturbance	
3. Have the Plan approved by the RC	
Consider splitting into individual Requirements.	

Duke Energy Response:

Splitting Requirement R1 into individual Requirements is duplicative or previously addressed in a prior Standard version. Specifically: (1) EOP-005-2 R7 previously considered and removed the singular Requirement to implement a Restoration Plan following a Disturbance and (2) EOP-005-3 R4 already requires a revised Plan to be approved by the RC.

NERC: C3: R1X Add Identification of Load enabled with Underfrequency Load Shed (UFLS) devices and setpoint frequencies.

Duke Energy Response:

Identification of Load enabled with UFLS devices and setpoint frequencies is duplicative. Specifically, if a specific Load (or all Loads) are identified, then the loads would fall under R1.8.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee no NGrid

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

5. For [EOP-006-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Carl Pineault - Hydro-Quebec Production - 1,5

Answer No

Document Name

Comment

No comments

Selected wrong choice. Answer is Yes.

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Energy supports and incorporates by reference Edison Electric Institute's (EEI) response to Question 5.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI offers the following comments:

1. EEI does not agree that Requirement R1 is unclear or ambiguous. While we do not disagree that Requirement R1 reads like a statement rather than a requirement, the enforceable requirements are clearly contained in Requirement R1's subparts.
2. EEI does not agree that Requirement R6 implies a need for a "hard copy" of the latest restoration plan of each TOP within the RC's primary and backup control center because the word "copy" can be understood to mean a hard copy or soft copy.

3. EEI supports the comment that consideration should be given to modifying Requirement R8 to allow regional drills, not conducted by a single RC, to satisfy the drill requirements contained in Requirement R8. Such a change would contribute to improved efficiencies for both the RC and those entities participating in those drills.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee no NGrid

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

6. For [EOP-008-2](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI offers the following comments:

1. Distribution System Operators should not be added to the applicability section of EOP-008-2. While EEI recognizes that DERs are growing, and they are having greater impact on BES reliability, additional analysis and justification to substantiate such a change is needed before such a change is considered.
2. EEI supports the comment that Requirement R8 “does not support reliability,” and the drafting team’s conclusion implies that this requirement may merit consideration for retirement, or as suggested by the RE that the obligations contained in this requirement might be better suited to a Reliability Guideline.

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Energy supports and incorporates by reference Edison Electric Institute’s (EEI) response to Question 6.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

R1 C3: Requirement 1.4 is a combined requirement. IT requires an Operating Procedure used in determining when to implement backup functionality and a requirement that specifies decision making authority to implement the backup functionality. This is confusing and should be separated into two distinct requirements.

R2: Q3 & Q11 : “have a copy” implies a hard copy printed out. It is possible to have an electronic copy available and can ensure that both “copies” are consistent. However, it is unclear if this is acceptable for compliance.

R4: Q11 the statement in parenthesis “provided through its own dedicated backup functionality or at another entity’s control center..” is confusing, it basically stats that an entity or anyone else can provide the functionality. Why specify this distinction as it’s not clear who must do what.

R5 Q11: “any changes of any part of the Operating Plan..” is a vague description. A change in just a phone number for the enteties necessary to contact per 1.6.1 whoudl thus require an approval of the change. That may be a lengthly approval process for a simple phone number update. SRP recomends that an approval only be required for a substative change or a change in the process itself or even just a change for items in R1.2 items.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer

No

Document Name

Comment

No comments

Selected wrong choice. Answer is Yes.

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer

Yes

Document Name

Comment

Relative to C2, for requirements R1 and R2, we appreciate the comment and understand its foundation, however, the identified functions (Distribution System Operator, etc.) are not currently part of the registered functions set forth in the Rules of Procedure. The addition of a new functional entity to Rules of Procedure must occur before they can be considered for addition to the applicable sections of EOP-004. For this reason, the referenced comment is beyond the scope of this project.

GSOC disagrees with the comments regarding setting deadlines for recovery after an unplanned outage. While we understand the concern that not having undefined boundaries on the recovery of functionality after an unplanned outage presents, we would suggest that unplanned outages can occur as a result of abnormal and sometimes catastrophic events. It would be challenging to identify an appropriate apply time limit or deadline within which entities should recover when their unplanned outage occurs as a result of a catastrophic event. For this reason, we would not support the addition of generic or over-arching deadlines for recovery from unplanned outages.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee no NGrid

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

7. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6

Answer

Document Name

Comment

All of the grades were pretty close, meaning all graders agree the Standards are accomplishing their intent.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Document Name

Comment

No additional comments at this time.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Document Name

Comment

No additional comments

Likes 0

Dislikes 0

Response

Alan Kloster - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - MRO

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response