



September 3, 2003

Coordinate Operations Business Practices TF
North American Energy Standards Board
1301 Fannin, Suite 2350
Houston, TX 77002

RE: COBPTF Scoping Document

Please consider the following comments regarding the draft COBPTF Scoping document posted on the NAESB website:

- As noted in the introduction to the scoping document, the SRS has assigned the COBPTF to review NERC's proposed "*Coordinate Operations Between Reliability Authorities*" (COBRA) standard and to recommend whether a companion business standard is appropriate. However, the scoping document falls short of analyzing whether a companion standard to NERC's COBRA is needed, but instead moves towards a discussion about whether a business practice/standard regarding communications/data exchange is necessary. This task may indeed need to be performed, but I don't think that was the intended purpose of this scoping document.
- In my opinion, the need for NAESB to create a companion standard is not clear. The NERC standard in question addresses communication and coordination between Reliability Authorities. My understanding is that an existing system, known as the Reliability Coordinator Information System (RCIS) is in place to handle RA communication. In addition, the RA's should be responsible for determining "what" information they need in order to maintain a reliable power grid. Review of the proposed NERC standard reveals that the "how", that NAESB tends to focus on, will be addressed. Absent a request from the RAs for NAESB to develop a standard, it seems that the proposed NERC standard should have the relevant issues covered (i.e., no need for a companion standard). This possibly highlights the need for NAESB to consider whether it should pursue the development of esoteric standards or focus only on standards that have a national impact.
- With the exception of Policy 4.C, item 2, dealing with voltage regulation equipment, it appears that the content of the policies scheduled to be retired upon completion of the

proposed COBRA standard will be incorporated into the proposed NERC standard. Thus, I don't think that anything has fallen between the cracks.

- I concur with the assessment that NERC policies 4, 5, 6 and 9 will be retired (as is true with all 9 NERC policies) when NERC completes its transition process. I believe that part of the scope of the SRS should be to undertake a review all NERC policies and identify business practices/standards embedded within them for consideration of development as NAESB business practices/standards.

Thank you for the opportunity to comment

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Johnson", with a long horizontal flourish extending to the right.

Alan Johnson
Manager Business & Reliability Standards