Standard Authorization Request (SAR) Form

Title of Proposed Standard:	Assess Transmission Future Needs and Develop Transmission Plans
Request Date:	March 6, 2002
Authorized for Posting:	March 20, 2002
SAR ID# :	TRNS_NDS_&_PLNS_01_01

SAR Requestor Information		**SAR Type** (Put an 'x' in front of one of these selections)	
Name:	Jim Byrd	X	New Standard
Primary Contact:	Jim Byrd		Revision to existing Standard
Telephone: Fax:	214-743-6870 972-263-6710		Withdrawal of existing Standard
e-mail:	jbyrd@txu.com		Emergency Action

Purpose/Industry Need (Provide one or two sentences)

To establish a standard for assessing and planning the transmission systems in North America.
The transmission system must be assessed and planned to ensure that it performs its intended functions in providing reliable delivery of power for the future needs of customers.

Brief Description (A few sentences or a paragraph)

Requirements shall be established for assessing transmission system performance under a variety of system conditions including system normal conditions, abnormal conditions, and extreme system conditions. Requirements shall be established for a plan, including a definition of the planning horizon, to address these conditions to ensure that the interconnected transmission systems perform their intended functions and to prevent severe adverse effects such as uncontrolled or cascading interruption of network operation. The plan may utilize operating, construction, market solutions or other components to address these conditions.

SAR: Assess Transmission Future Needs and Develop Transmission Plans

Reliability Functions

The Standard will Apply to the Following Functions *(Put an 'X' in front of each one that applies)*		
X	Reliability Authority	Ensures the reliability of the bulk transmission system within its Security Authority Area. This is the highest reliability authority.
	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its metered boundary and supports system frequency in real time
	Interchange Authority	Authorizes valid and balanced Interchange Schedules
X	Planning Authority	Plans the bulk electric system
	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
X	Transmission Owner	Owns transmission facilities
	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders
	Distribution Provider	Provides and operates the "wires" between the transmission system and the customer
	Generator	Owns and operates generation unit(s) or runs a market for generation products that performs the functions of supplying energy and Interconnected Operations Services
	Purchasing-Selling Entity	The function of purchasing or selling energy, capacity and all necessary Interconnected Operations Services as required.
	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user

SAR: Assess Transmission Future Needs and Develop Transmission Plans

Reliability and Market Interface Principles

Applicable Reliability Principles *(Put an 'x in front of all that apply)*	
X	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions.
	2. The frequency of interconnected bulk electric systems shall be controlled within defined limits through the balancing of electric supply and demand
X	3. Information necessary for planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably
	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented
	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems
X	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified and have the responsibility and authority to implement actions
X	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis

Does the proposed Standard comply with all of the following Market Interface Principles? *(Enter 'yes' or 'no')*	YES
1. Interconnected The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy	
2. An Organization Standard shall not give any market participant an unfair competitive advantage	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard	
5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards	

Assess Transmission Future Needs and Develop Transmission Plans

SAR Commenter Information			
Name	David H. McMillan		
Organization	Calpine		
Telephone	713-830-8710	Fax	713-830-2001
E-mail	dmcmillan@calpine.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?
☒ Yes ☐ No

Look at the SAR called: Assess Transmission Future Needs and Develop Transmission Plans:
Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No
☐ Yes ☒ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☒ The scope of the SAR should be reduced to eliminate: any aspect that goes beyond establishing specific reliability criteria to be incorporated into the Transmission Planning activity and product.
Other comments: The "Generator" reliability function should be checked as being impacted since generators are defined as an integral component of the bulk power transmission system being planned.

SAR Commenter Information			
Name	Bill Carr		
Organization	Dynegy, Inc.		
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E-mail	bill.carr@dynegy.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?
☒ Yes ☐ No

Look at the SAR called: Assess Transmission Future Needs and Develop Transmission Plans:
Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No
☒ Yes ☐ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☐ The scope of the SAR should be reduced to eliminate:
Other comments: The purpose/industry need section should start with: The purpose of this standard is to ensure that a consistent, uniformly applied standard is developed .. ..

SAR Commenter Information			
Name	John Anderson and John Hughes		
Organization	Electricity Consumers Resource Council (ELCON)		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

The actual drafting of these 11 SARs is premature. Every "reliability" standard also is a "commercial" standard. There must be very detailed coordination with the organization that will establish "commercial" standards (NAESB). Such coordination has not even begun. The scope, procedures, process and practices of such coordination must be clearly specified and agreed to before the drafting of the SARs begins.

Look at the SAR called: Assess Transmission Future Needs and Develop Transmission Plans:
Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No
☐ Yes ☒ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☒ The scope of the SAR should be reduced to eliminate: The establishment of this SAR is premature. All commercial implications of the SAR should be identified and mitigated prior to the drafting.

SAR Commenter Information			
Name	Phil Park		
Organization	Powerex		
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E-mail	phil.park@powerex.com		

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

I have a general comment to preface my comments on the individual SARs. To me, what we are calling a "core reliability requirements" are simply technical specifications for things we believe the industry cannot adequately address through commercial negotiations between individual players or things too small to bother with by one on one negotiations. Core reliability requirements do not include business practices. These technical specification should ensure that they do not prohibit worthwhile commercial negotiations. With this definition, all core reliability requirements have commercial elements. I can accept this and this should not inhibit us from setting a technical specification (core reliability requirement) where one makes sense. However, we must avoid setting one whenever we can, simply because we can. This latter approach will inhibit valuable commercial activity. If the reliability standards become so encompassing that they threaten commercial activity, we will simply end up focusing on including exemptions, waivers, and differences such that the standard has limited applicability.

In many cases in my comments below I have not indicated whether or not the proposed standard is required. This can only be determined after we have rationalized the details of each of the SARs. The answer to this question should be an outcome of the process, not an input to it.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☐ No
☐ Yes ☒ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☐ The scope of the SAR should be reduced to eliminate: The description should be revised as follows:

"Requirements shall be established to ensure that interconnected transmission systems are planned such that they can reliably perform their intended functions over a wide range of system conditions." The phase "while continuing to operate reliably within equipment and electric system thermal, voltage, and statbility limits" should be transferred to SAR #2 addressing facility ratings, operating limits, and transfer capabilities.

Other comments: *Assessment of future needs and development of transmission plans is highly related to commercial processes. As in other markets, information needs to be collected to assess future ability of the market participants to respond to market requirements. This SAR should be coordinated with business practices for the industry.*

The phase I am recommending be moved to SAR #2, which appears to encompass standards presently covered by Planning Standards I.A (Table 1) and I.D, is the major component that makes this SAR a core reliability requirement. My rationale for moving this to SAR #2 is included in the comment form for that SAR.

SAR Commenter Information			
Name	MAAC Region		
Organization	MAAC		
Telephone	610-666-8854	Fax	610-666-2297
E-mail	dicapram@pjm.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

MAAC questions the need for standards concerning 'Design' of Protection systems, Physical connection, Coordinate Interchange, and Analysis of disturbances.

"Design" issues are commercial issues not reliability issues.
The Transmission Operators will define Interconnection Agreements.
Coordination of Interchange can be a subset of "Coordinate Operations"
Disturbance analysis will be address by regulators

Most of these are good business practices or good utility practice but not core reliability standards.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments:

The substance of this SAR should focus on defining 'uniform study conditions' and on ensuring that all interregional analyses use those conditions.

Must ensure that the SAR does NOT become a mandate "to use the same load flow Tool" (which would be a violation of the Market principles).

SAR Commenter Information			
Name	Mike Miller		
Organization	Southern Company		
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E-mail	mbmiller@southernco.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within operating limits. I feel that this terminology (operating limits or other term such as Operating Security Limits) should be common among all SARs. The system must be planned so that it can be operated reliably. Using this terminology in all SARs would provide the appropriate link among them.

Without knowing the details that will be included in the standards as described by these SARs, it is difficult to make an assessment on the completeness of this set of SARs. I feel that there should be a SAR that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: Planning must be coordinated to optimize not only transmission but generation as well. The left alone process of disjointing generation and transmission is creating a non-steady state electrical system. The criteria for designing a system must include defined measurements adopted by all. This brief description does not provide sufficient detail to ensure reliability is planned. The planning criteria must address defined transmission planning for transfer usage as well as specific load service usage in other words interconnection as well as intraconnection. The need to define roles, responsibilities and authority must be developed between Federal (RTO) characteristics and functions and transmission owners.

☐ The scope of the SAR should be reduced to eliminate:

Other comments: Transmission Operator and perhaps Distribution Provider should be added to the list of applicable functions.

SAR Commenter Information			
Name	Alan Johnson		
Organization	Mirant Americas Energy Marketing		
Telephone	678-579-3108	Fax	678-579-5760
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

There may not be a need for the following two standards: i) Define (Physical) Connection Requirements; and ii) Monitor and Analyze Disturbances, Events, and Conditions.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate: Reference to standardization of the solution set for the transmission plan (see Brief Description section). Mirant is concerned that the standard goes beyond assessment and planning of the bulk transmission system, delving into definition of the methods for meeting the plan. Per the *Market Interface Principles* (principle 4), the standard should not inhibit commercial/market solutions.

Other comments:

Mirant believes that the standard should not apply to the Transmission Owner function, consistent with the *Functional Model*.

April 23, 2002

SRP Comments on NERC 11 SAR sent out on April 2, 2002.

All 11 SAR's (this group of 10 plus the one sent out earlier) don't contain enough information to make the kind of judgments requested on the forms. Therefore the forms are not filled out.

We recommend all the SAR's be advanced to the next step to develop the specific standards and associated measurements for each standard so that we can evaluate and comment on them.

All of these SAR's are needed for reliable planning and operation of the bulk electric transmission system and meet the principle requirements.

Comments on the White paper:

1. The paper fails to state what standards are supposed to be. This seems so basic; one has to assume that those drafting the white paper want to redefine the definition contained in the Organizational Standards Manual. This leads to a lot of confusion and is not the place to do that.

2. The Planning Standards were written in a different time period than the Operating Policies with different objectives. Thus they are different and that should be recognized. For instance the development of a Planning Functional model has absolutely nothing to do with whether control areas exist or not and whether companies have restructured or not. The statement about control areas may be true for the Operating Policies but it is not try for the Planning Standards.

   The Planning Standards (Templates) were written to meet the definition of a standard in the Organizational Standards Manual, to meet at least one of the Reliability Principles, to comply with all the Market Interface Principles and to contain the compliance administration elements. This is very different than what is contained in the Operating Policies. The Planning Standards need to go through the new process so that both the Operating elements and Planning elements of the Organizational Standards are consistent, are not duplicative and are needed for reliability.

3. The term " core reliability requirement" is used in the white paper but is never mentioned in the Organizational Standards Manual. Using an undefined term is very misleading and should be avoided.

4. The paper in several places address "what performance must be achieved". As noted above, an Organizational Standard can be broader than that and this write up is misleading.

5. The process has been lengthened because of the multiple posting of the SAR's. NERC has a body of reliability requirements written up into Compliance Templates. With very little effort these could be written up into SAR's that would provide sufficient detail for NERC to evaluate them. It is very hard to comprehend why one does not use this work to expedite the process. Instead SAR's are sent out with insufficient information. The process is long enough. We should be looking for all ways possible to speed it up.

Comments on the SAR write-up:

1. The SAR write-up only contains the purpose and brief description of a standard. Where is the Standard? I thought that is what the SAR is for?

2. The descriptions are in most cases extremely vague. The write-ups contain words like "such as" or "as defined in the standard". These are big enough to cover a MAC truck. Once again there is insufficient information to make a good judgment.

April 29, 2002

Guy V. Zito
Manager, Planning
Northeast Power Coordinating Council
1515 Broadway Floor 43
New York, NY 10036

RE: NEPOOL Compliance Working Group (NCWG) comments pertaining to the 10 Standard Authorization Requests (SARs) posted for open comment

The NCWG has reviewed the 10 SARs posted for open comment and has agreed they are core standards, which serve a purpose in support of reliability.

Standard Title:
Prepare for and Respond to Abnormal or Emergency Conditions
Prepare for and Respond to Blackout or Island Conditions
Coordinate Interchange
Coordinate Operations
Monitor and Analyze Disturbances, Events and Conditions
Operate Within Limits – Monitor and Assess Short-term Transmission
Define (Physical) Connection Requirements
Design, Install, and Coordinate Control Protection Systems
Assess Transmission Future Needs and Develop Transmission Plans
Determine Facility Ratings, Operating Limits, and Transfer Capabilities

We do not agree that the **SAR Type** is a new standard. We suggest that at a minimum the SAR should indicate the existing standard and whether or not it will be withdrawn when the revised standard is adopted. We suggest that NERC stop the open process of reviewing existing policies and standards if these Organizational Standards will replace them. NERC should clearly indicate that one purpose of the Organizational Standards Process is to replace existing standards.

Sincerely,
Daniel L. Stosick

Chairman, NEPOOL Compliance Working Group
C/o ISO New England, Inc.
One Sullivan Road
Holyoke MA 01040-2841

Cc: NEPOOL Compliance Working Group
CP9 Working Group
Paul Shortly
Richard Burke
Richard Kowalski

SAR Commenter Information			
Name	Robert D. Smith		
Organization	Arizona Public Service		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: We do not believe that transmission plans should utilize market solutions as solutions to identify problems.

SAR Commenter Information			
Name	Mr. Charles Moser (Northborough, MA) and Mr. Ronald Halsey (Syracuse, NY)		
Organization	National Grid USA		
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E-mail	charles.moser@us.ngrid.com ronald.halsey@us.ngrid.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: These standards as written delve much too deeply into the details of "HOW" and "WHAT" AND "WHEN". They instead should stick to the idea of developing an umbrella of BROAD PERFORMANCE BASED CRITERIA standards that establish the basis for the creation of Region specific standards that will meet the intent of the NERC standard.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate:

Other comments: The standard should define the transmission system performance basis upon which any planning or assessment efforts would be measured. We do not need a standard on HOW to assess or plan our systems. We need a broad based standard that will define the required transmission system performance levels based on an established and demonstrated need for such performance levels rather than on an abstract concept of "reliability".

SAR Commenter Information			
Name	Vern Colbert		
Organization	Dominion Virginia Power		
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E-mail	vern_colbert@dom.com		
Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid? ☒ Yes ☐ No			

SAR Commenter Information			
Name	Greg Gideon		
Organization	TXU Energy		
Telephone	214-875-9483	Fax	214-875-9246
e-mail	ggideon1@txu.com		
Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid? ☒ Yes ☐ No			

SAR Commenter Information			
Name	Paul Rocha		
Organization	Reliant Energy HL&P		
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e-mail	paul-rocha@reliantenergy.com		

Reliant Energy HL&P ("HL&P") files these comments regarding the ten Standard Authorization Requests (SARs) discussed below. Please note that HL&P is the regulated electric utility operating in and around the area of Houston, Texas, within the ERCOT region. HL&P does not represent Reliant Resources, the unregulated energy services company operating in various areas of North America and Europe. Reliant Energy expects to spin off Reliant Resources later this year. In anticipation of the pending separation, HL&P and Reliant Resources are operating in large part as two separate companies. It is HL&P's understanding that Reliant Resources may separately provide comments regarding these SARs.

HL&P agrees that there is a need for a standard for assessing transmission future needs and developing transmission plans. We support ERCOT's comments, which either have or will soon be filed, regarding the appropriate scope and characteristics of such standards. However, we believe a prospective NERC planning standard should apply to interstate and international electric systems only, and should not apply to intrastate electric systems such as ERCOT, as explained more fully below.

The assessment of need and development of transmission plans should strive for an appropriate balance between ensuring reliability, maintaining reasonable transmission rates, mitigating congestion costs, and avoiding unnecessary landowner impact. For intrastate transmission systems such as ERCOT, HL&P believes that the appropriate place to balance these objectives is within the intrastate region itself, since the ERCOT organization, and the standards it develops, are subject to state commission review and approval. That same state commission (the Public Utility Commission of Texas) also has rate-setting and line certification authority, and thus is uniquely positioned to balance the conflicting objectives involved in transmission system planning. However, for interstate and international regions, it may be appropriate for NERC to develop a transmission planning standard. Recognizing that NERC does not have rate-setting or line certification authority, NERC should guard against establishing one-dimensional standards that fail to take into account all the dimensions that guide the transmission planning process.

SAR Commenter Information			
Name	Brant Eldridge		
Organization	ECAR		
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ECAR has conducted a survey of its member companies regarding the eleven SARs, which NERC has initiated to-date. We recognize that the comment period for the first SAR issued ("Balance Resources and Demand") has already closed. However, considering that the first SAR was issued earlier than the other ten primarily just to get the process started, and further considering that all 11 SARs are viewed by NERC as a possible complete set of Organization Standards (re: the "White Paper"), ECAR believes that comments on the first SAR should still be considered along with those on the other ten.

11 of the 18 ECAR Full Members, along with two Associate Members, submitted responses to the SAR survey. Some of the responses were submitted using the NERC "SAR Comment Form", while others were contained in narrative e-mails, and one was faxed to us. Therefore, a complete set of the ECAR member company responses will be sent to the Standards Process Manager at NERC via Fed Ex to arrive at NERC by May 3rd. The Fed Ex package will include a copy of this e-mail. FYI, NERC may also receive some of the ECAR member company responses directly from the companies. Some of the individual company responses will be identical to what will be in the Fed Ex package and some will contain more detailed comments.

The ECAR member company responses contain numerous and wide-ranging comments about the need for each of the 11 proposed Organization Standards, as well as comments regarding the scope and applicability of the SARs. As your review of these responses will show, there is general ECAR consensus – but not unanimity -- that the 11 SARs as a set cover the scope of performance needed to ensure reliability of the interconnected North American bulk power systems. Some ECAR members feel that there are performance areas not covered in the proposed set of Organization Standards, and they have provided what they think is missing. Others believe that some of the proposed Organization Standards are not needed, and they explain why they feel that way. Numerous comments were directed at the scope and applicability of the SARs. Several ECAR companies questioned the inclusion of the "Distribution Provider" function in the applicability section of the SARs, believing that NERC should stick to its traditional focus on the bulk power systems and stay out of the distribution arena.

The recent call for nominees to serve on SAR Drafting Teams is the appropriate next step. ECAR believes that all 11 SARs need to be refined to reflect industry comments and then posted again for another round of industry comments. Before proceeding into actual development of Organization Standards based on these 11 SARs, NERC must have clear industry consensus on the need for each of the Organization Standards outlined in the 11 SARs, as well as consensus on the scope and applicability of those SARs.

If the wide-ranging comments received from ECAR members are any indication, there is still some serious work to be done to achieve the needed clear industry consensus on how to proceed.

East Kentucky Power Cooperative (General Comment)

EKPC believes our present standards are adequate and therefore is not in favor of developing a new set of standards. We also believe the new process should be revised to provide for a screening committee to evaluate proposed standards before they are presented to all NERC members for comment. However, given that we are going to develop new standards with this process, EKPC endorses all eleven of the SARs. Thanks, Paul Atchison.

LG&E Energy (General Comment)

LG&E agrees there is a need for the eleven proposed organization standards. However, we do see a disconnect with their development and operating procedures/protocols of RTO's. Where will this coordination take place to ensure consistency, eliminate redundancy, and application particularly since there will most likely be more than 1 RTO at the time of issuance?

VECTRON - Southern Indiana Gas & Electric (General Comment)

The NERC Proposed Organization Standards appear to me to cover the scope of performance needed to insure reliability of the interconnected grid. The scope of the SARs as proposed, also, look fine to me.

Dayton Power & Light (General Comment)

We are okay with the 11 proposed Standards.

American Electric Power (General Comment)

BERNIE M PASTERNACK
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American Electric Power is providing the following comments on the 10 most recent Standard Authorization Requests (SARs) to ECAR as input to the formulation of ECAR's response to NERC. AEP looks forward to working with ECAR and NERC as well as other market participants to ensure the continued reliability of the electrical system.

Clearly the electricity industry has been exceptionally dynamic and fluid in recent years and is going through many changes. While changes can be positive, it is incumbent on the industry to ensure that changes, which are adopted result in enhanced reliability and a better market environment. With this in mind, we envision that there are actually three interrelated but separable processes with respect to the development of standards.

First, the relevant standards need to be identified. Over recent months this has been referred to as defining "what" the standard is.

Second, there need to be decisions about "how" these standards are to be achieved.

Third, choices have to be made as to how these standards will be implemented.

The resultant standards, when implemented and operational, will potentially affect production, consumption and investment decisions. By necessity, the standards, including how they are achieved and implemented, are closely related to the design of the market and the separation of functions among market

participants and service providers. For this reason, we encourage discussion and even preliminary definition of what core reliability standards are needed. However, we strongly urge restraint with respect to the other two aspects of the process - defining how the standards will be achieved as well as how they will be implemented. In our opinion, the latter two processes are highly integrated with the process of market design and implementation as well as market operation; the development of RTOs; and the definition of the NERC/NAESB interface.

Given that closure on many of the market design issues is expected in the near future, we see little risk in delaying the latter two processes - how the standards are achieved and implemented-- until such time as clarity is achieved on Standard Market Design (SMD) and RTO formation. Moreover, since the NERC/NAESB interface will likely impact decisions on how standards will be achieved as well as how they will be implemented, it seems logical to wait until that interface has been defined.

We think it would be beneficial for NERC to recognize that nothing is gained by deciding how the standards will be achieved (including implementation) at this stage of the debate on Standard Market Design and the RTO development process. We would prefer to see the SAR process simply make the threshold determination as to whether any of the proposed standards are needed, and then put on hold the actual development of those standards that are needed until the critical market development activities described above are closer to completion. AEP is reviewing the SARs with particular emphasis on their scope, both individually and collectively, and we plan to provide appropriate comments to NERC by May 3.

Consumers Energy (General Comment)

Consumers Energy opposes all 10 of the SARs on their present form. We understand that it is too late to vote on the 11th SAR.

The concern that we have is that there is only limited ability to prevent new requirements from being incorporated with the old, standard reliability requirements. The SAR descriptions sound good because they espouse the old, tried and true reliability concepts that we have known and loved from the past. If there was an effective way to limit the resulting practices to those traditional values, I would be the first to support them. Unfortunately, we are not voting here on codification of the current practices. We, instead, are voting to develop a set of practices that will include the currently unknown and possibly oppressive, unacceptable set of future requirements. This vote has nothing to do with the tried and true practices from the past. Its about accepting an unknown set of requirements on faith and trust ... that none of the practice developers will be out to do us harm.

The standard argument here is that the SARs are only scope setting documents and that we will still have a change to shape and to vote on the actual standards when they go through the final approval stage. If we believe this argument, we are totally ignoring the lessons from the past. There is no guarantee that ECAR will have any personnel involved in the development of the final practices. It is unclear how many people will be involved in the drafting of the practices nor how they will be selected.

The biggest single concern is what the final product will look like and how it will be voted on. I would make a modest wager that it will consist of a handful of standard practices that we all could accept (and in fact would insist upon) along with three practices that are new and totally unacceptable. We will be faced with the proposition that we must vote on the "package" of practices where we must accept the bad ones to get the good ones. I can find no reference to a line item voting procedure.

The solution to this problem is to suggest a provision in all ten SARs that the final package of practices will not include any policies that are not already in the NERC approved set of policies and standards. Consumers Energy could then support all ten SARs.

C.V. Waits

Duquesne Light Company (General Comment)

OPERATIONS AND ASSET MANAGEMENT
System Operations
Transmission Business

TO: Brant Eldridge
FROM: J. F. Rosser
DATE: May 8, 2002
SUBJECT: NERC "Organizational Standards"

In response to your memo of April 19, 2002, Duquesne Light Company presents the following comments concerning the eleven "Standard Authorization Request" (SAR) Forms. Generally, the proposed standards seem to simply restate today's standards and label them as "new" Organizational Standards. Specifically, the proposed SAR titled "Balance Resources and Demand" is really a restatement of the current Disturbance Control Measure, CPS1, CPS2 and a new Frequency Response Measurement. This SAR, as represented at the CRC meeting, was to provide an example of how other SARs should be composed.

1. The purpose of the standard is stated as; Maintain scheduled Frequency within an Interconnection.

2. The Industry need includes Arrest Sudden frequency changes; Prevent Time error; Prevent Operation of Underfrequency Relays, prevent line loading limits violations, minimize inadvertant interchange.

3. Standards include; a measurement (FRM) to ensure automatic throttle controls are available to arrest frequency changes, a measurement (CPM1) to ensure adequate generation control regulation to maintain scheduled frequency, a measurement (CPM2) to ensure unscheduled power flows do not occur which could cause transmission operating limit violations, a measurement (DCM) to ensure scheduled frequency is maintained after a disturbance.

It is evident that this SAR's Title, Purpose, Need and Measures are inconsistent with each other, mixing frequency schedules and inadvertant accumulations with transmission loading violations and time error. Also, certain "Needs" and "Standards" are inconsistent with the NERC BOT decision to not pursue the development of business practices (i.e., minimization of inadvertant accumulations, timer error accumulations, etc. are equity issues and not related to reliability concerns).

Furthermore, suggested are measures that better relate to other Standards. For example, transmission limit violations fit better into "Monitor and Assess Short Term Transmission Reliability" – operate within limits. When considered under that alternate standard, this measurement may not survive because other measurements may be deemed more appropriate.

Look at the SAR from a purely technical approach. In doing so, Duquesne Light suggests that the title of the Standard "Balance Resources and Load" should be rewritten to be "Maintain Scheduled Frequency".

The Purpose of Standards would be to maintain Interconnection frequency within acceptable limits.

The Industry Need would be to prevent damage to customer equipment and to prevent unstable operations related to disturbances.

The Standard should include a description of acceptable frequency along with a technical defense of the standard including standard generator limits, motor limits, etc.. See ECAR Document #3, Appendix 1, (attached) as an example.

The Standard should include adherence to accepted industry practices such as the installation of underfrequency relays, automatic governor control requirements, etc. including the operation of this equipment within limits specified within the standard.

Measures and Requirements may include:

1. a measurement similar to CPS1
2. annual audit of underfrequency load shedding equipment, levels, and set points
3. annual audit of the status and condition of automatic governor controls
4. monitoring of frequency excursions related to disturbance conditions (Security Coordinator)
5. Coordination of interchange schedules

Measurements should not include:

1. DCM because it duplicates CPM1 and is not frequency sensitive
2. CPM2 because it purports to protect against transmission loading violations related to SAR #6

If NERC would consider business practices, the ECAR Inadvertant Settlement Process could be incorporated into the standard with a longer range target of replacing energy banks with a pay as you go policy, possible tied to adders ($/MWH) related to system frequency deviations from schedule. Otherwise, NAESB would develop these business practices.

The following are Duquesne's comments on the other 10 proposed SARs.

1. Assess Transmission Future Needs & Develop Transmission Plans – Appropriate
2. Determine Facility Ratings, Operating Limits and Transfer Capabilities – Appropriate
3. Design, Install, Coordinate Control and Protection Systems – Appropriate
   Standard should be expanded to include coordination between Transmission Owners, Transmission Operators, etc.
4. Define (Physical) Connection Requirements – Inappropriate as a stand alone SAR
   This SAR should be included in SARs #2, #3, #6, #7, #8, #9, #10, #11
5. Previously reviewed
6. Operate Within Limits – Monitor & Assess – Inappropriate as a stand alone SAR, but should be incorporated with SAR #8. Coordinated operations are required to ensure limits are not violated.
7. Coordinate Interchange – Inappropriate as a stand alone SAR. Should be part of SAR #5.
8. See review of SAR #6.

9., 10., and 11. Should be incorporated into SAR #6/#8 and/or #5 as modified by DLC

In conclusion, Duquesne Light applauds the NERC SAR initiative. NERC must, however, take care to not simply allow this initiative to be a restatement of existing standards

and application of performance measurements that miss the target. Care must be taken to identify the exact technical need/purpose (quantifiable) for each performance standard, ensuring that each performance measurement ties precisely with a stated need/purpose in support of the standard (e.g., A Standard whose purpose is to maintain frequency should not be tied to a need to limit unscheduled power flows that can cause operating limit violations but should be tied to general turbine-generator requirements).

cc: ECAR Executive Board
ECAR Coordination Review Committee
ECAR Market Interface Committee

SAR Commenter Information			
Name	David L. Hart		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: The SAR seems broad enough to enable it to include planning associated with IPPs. This should definitely be considered in the further development of this Standard.

SAR Commenter Information			
Name	Lew Gray, Mike Holtsclaw, Steve Clouse		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

What is missing from the NERC set of SARs?

1. Load forecasting, generation capacity, and capacity margin analysis.
2. Generation operating requirements:
    a. Voltage schedule produced and followed
    b. Voltage control kept on automatic
    c. Generator controls with a 5% or less droop
    d. Speed control (frequency) on automatic
    e. Record the times and reasons when speed control, voltage control, or voltage schedule were not on automatic.
3. Reliable construction and maintenance standards for transmission lines, transmission substations, and generation substations.
4. Control Area tie-line tripping for conditions of:
    a. Under frequency
    b. Overload
    c. Instability
    d. Voltage collapse

    Note that item #4 was not included in the old NERC Reliability Standards. We did not have the technical ability to properly manage these conditions for at least the first twenty years of NERC. We now have the technical ability to predict and operate at the **points of no recovery** for these conditions and should not do so, to:
    a. Reduce the number of **Control Areas Blacked Out** by a major disturbance to the interconnected grid.
    b. Make **Safe Unit Shut Down Power** from neighboring control areas much more available.
    c. Make **Unit Restart Power** much more available from neighboring control areas.
    d. Make **Load Restoration Power** much more available from neighboring control areas.
    e. **Reduce Dependence** on questionable black start plans.
    f. **Never disconnect a control area** from the interconnected grid, unnecessarily.

All that is needed at this time for this item #4 is that the five ECAR technical panels involved (OP, TSPP, TFP, GFP, PP) develop a set of guides for these four conditions for which tie lines should be tripped. Then, any control area that would like to obtain the six advantages listed above, would have a solid well thought out set of guides to start from. (I would be glad to help any of the technical panels with the details. Lew Gray)

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

Other comments: The Standard should also apply to the Transmission Provider function since the source fo much of the congestion management/ TLR related data will be obtained from this functional area.

SAR Commenter Information			
Name	Verne B. Ingersoll, II		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

General Comments:

1) Even though the Standards drafting committee is to be fairly small (8 or 9, I believe), there needs to be a committee VOTING process for deciding on the final proposed wording or a Standard.

2) There needs to be a formal face to face forum for reviewing SARs after the drafting committee has done its work. Some have proposed the current Standing Committee meeting as this forum. As long as the meetings match up with the Standards development timeline, this would be OK.

3) We also support the submittal of the actual Standards Development process through the SAR process. The current process was developed without any "due process" or formal approval process prior to the BOT adoption.

4) We still believe that there are too many Segments in the NERC process.

5) The new NERC standards development should be completed and receive ANSI approval before development begins on the new standards contemplated by these SARS. Proceeding with SARS before the new standards process is in place ensures that significant re-work will be required.

6) The industry is already stretched very thin supporting the many NERC and FERC initiatives. The number of SARs proposed at one time is excessive. Also, there will be inevitable overlaps and conflicts between the various SAR drafting groups. Only 1 or 2 SARs should move forward at one time.

7) The time provided to review and comment on such a large number of SARs was insufficient to do a thorough review and provide accurate and complete comments.

The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within operating limits. We feel that this terminology (operating limits or other term such as Operating Security Limits) should be common among all SARs. The system must be planned so that it can be opearated reliably. Using this terminology in all SARs would provide the appropriate link among them.

Without knowing the details that will be included in the standards as described by these SARs, it is difficult to make an assessment on the completeness of this set of SARs. We feel that there should be a SAR that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.

Maintenance requirements should cover transmission equipment other than just protection and control equipment.

A lot of vital requirements of existing policies are not included in any of the proposed SARS, i.e., time error correction, inadvertent, etc.

The main power equipment design, installation, and maintenance requirements are not adequately addressed in these SARs (i.e. circuit breakers, transformers, transmission lines, etc.). Should also address transmission line right-of-way maintenance.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

It appears that some of the SARS overlap and cover some of the same areas, such as "Prepare For and Respond to Emergency Conditions", "Prepare for and Respjond to Blackout or Island conditions", and "Monitor and Analyze Disturbances, Events, and Conditions". These could all fall under a single Emergency Operations SAR. "Coordinate Interchange" should also fall under "Coordinate Operations". In addition, the SARS are intended to define standards for core reliability functions, i.e., "who to do". Some of the SARS really describe processes (i.e., "how to do it") rather than define standards, such as the SAR on "Determine Facility Ratings, Operating Limits and Transfer Limits". There are others that may need to be combined-it is suggested that a remapping of policies to specific SARS should be done.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: For the Applicable Functions, TSP, T-owner, and T-operator could all apply. We question whether RA should be applicable. Was the RA inclusion possibly a holdover from when the Planning Authority was not developed?

The scope of this SAR seems rather large, perhaps it could be divided into more manageable pieces.

SAR Commenter Information		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: Core organization standards for reliability must be specific and offer measurable boundary conditions to achieve reliability objectives. Additionally, these standards should not presume that procedural requirements to achieve reliability objectives are included as part of a core reliability standard. Procedures may be necessary for entities to follow to meet NERC Organization Standards requirements. Most procedures meant to achieve reliability objectives contain impacts on the operations of the marketplace. The inextricable link between the reliability needs and the market needs makes the development of reliability-driven procedures impossible to do in a NERC reliability - focused process. If NERC proceeds to develop the core organization standards for reliability, there must be close coordination with entities, such as NAESB and RTOs, that will develop market-driven procedures so that a proper procedure can be developed to meet both reliability objectives and commercial needs.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate: any reference to criteria to be determined by boundary conditions established outside a measurable or quantifiable standard. A core standard for reliability should be specific and measurable. This SAR proposes that a standard be "a plan" that encompasses normal, abnormal, and extreme system conditions and not define what those conditions are. The plan is a solution - not a measurable standard. As stated in the SAR, "..the plan may utilize operating, construction, and market solutions..", there are numerous possible methods to facilitate the reliability need this SAR suggests. These methods revolve around market operations and should be developed in a process that considers all market interests and weigh those against a measurable reliability need. The proposed standard should be focused on the measurable and definable boundary conditions for "normal, abnormal, and extreme system conditions."

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

The proposed set of 11 Standards are described in very generic terms with few details. Therefore it is not possible to assess whether or not the set of these 11 organization standards is complete with respect to some or all areas of power system performance from reliability perspective. For example, there should be a standard for Power System Model (power flow, short circuit, dynamics, EMTP) Development along with corresponding Data Verification requirements. Is model building and data verification encompassed by the presently proposed set of standards? If so, there should be a separate stand-alone standard for it, because most, if not all, reliability and marketing decisions for performance and use of the transmission system are based on the analyses using this data. Providing timely, verified, and appropriate data should be the responsibility of all the users of the transmission system.

There also should be a standard for wide-area coordinated system planning. Is wide-area coordinated planning addressed by the proposed standards? While some level of coordination in planning and operation exists today, this level of coordination needs to be increased. Again, an RTO should facilitate coordination among its members and neighbors, but a standard for wide-area (beyond the boundaries of transmission owning entity, RRO, or RTO) planning would ensure that it is done on a regular and consistent basis.

Much effort (several man-years) was expended in the recent development of the NERC Planning Standards. It would seem that the main emphasis of those standards is still relevant. While we are not sure whether or not or how those standards would be used in this SAR process, we believe that at the very least, they should be used as starting points from which new standards can be developed that can wrap around the NERC Functional Model.

Not being involved in this process from the beginning, I am not sure what was considered in determining which existing standards belong in the proposed set of 11 as a separate standard. It would appear that Coordinate Interchange (SAR#7) and Coordinate Operations (SAR#8) could be combined into one Organizational Standard as could Prepare for and Respond to Abnormal or Emergency Conditions (SAR# 10) and Prepare for and Respond to Blackout or Island Conditions (SAR#11). Similarly, it appears that the proposed SAR#2, Determine Facility Ratings, Operating Limits, and Transfer Capabilities should be separated into three SARs.

Either in these Standards or The NERC Functional Model, a clear definition of who is ultimately responsible for compliance with the standard is required. For example, which entity assumes the ultimate responsibility for long term system planning? Is it ISO, RTO, ITC, Transmission Owner or Transmission Provider? As the function definition of the Planning Authority has not been defined yet, it is not certain that it would provide an answer to this question. In any case, responsible entities should be very clearly defined for compliance with each proposed standard or the new standards.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: More details to judge whether or not all reliability related activities are covered or not.

☐ The scope of the SAR should be reduced to eliminate:

Other comments: The purpose and description is too general. This standard may require to be split into two or more SARs.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid? ☒ Yes ☐ No			
Is there a reliability-related need for an Organization Standard to be developed on this topic? ☒ Yes ☐ No ☒ Yes ☐ No The scope of the SAR is fine as it is			

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: This high level SAR is ok, as is. More detail must be added in future SAR iterations/postings to provide expectations to those entities/individuals involved with planning and/or assessing the performance of the bulk power transmission system under varying conditions.

SAR Commenter Information			
Name	Terri Grabiak		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: The SARs do not seem to address requirements for data (network models, generator and load models) needed for static and dynamic studies in the Operating and Planning horizones.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: The sentences that refer to 'plan' to 'address these conditions' should be modified to incorporate the following concept;

When studies show that the system may not meet the performance requirements established for various conditions, plans shall be developed to address such situations, and studies shall demonstrate that when the plans are implemented the system will meet the established performance requirements.

SAR Commenter Information		
Name	George Bartlett	
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

N/A

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

Entergy believes there are three "core reliability" Organization Standards needed that constitute "what" is needed for reliability:

1) Balance Resources and Demand,
2) Operate Within Thermal, Voltage and Stability Limits, and
3) Coordinate Operations.

All the other eight SARs, including other processes like TLR, constitute "how" these three "core reliability" Organization Standards are met. The remaining eight SARs do not rise to the level of "core reliability" Organization Standards. These eight should be developed as processes, either by the industry within the three Organization Standards or by individual industry owners/participants. For instance, the E-Tag system was developed by the industry, facilitated by NERC, and is one part of the process for meeting the intent of "Coordinate Interchange", which itself is a process under "Balance Resources and Demand" and/or "Coordinate Operations". The existing TLR process was developed by the industry to assist industry participants meet the core Organization Standard "Operate Within Limits - Monitor and Assess Short-Term Transmission".

Others of the SARs should be developed by individuals but do not themselves rise to the level of "core reliability" Organization Standard. For instance, every system operator should have plans for recovering from blackout or islanding conditions, "Prepare for and Respond to Blackout or Island Conditions". However, we believe these processes should be developed by individual operators, unique to their own systems, and are not core Organization Standards.

Further comments on the individual SARs are included below for your consideration.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No
☐ Yes ☒ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☐ The scope of the SAR should be reduced to eliminate:

Other comments:

This SAR is really a requirement to establish a "process" for assessing and planning the transmission system. We view the contents of this SAR to be one of the "how"s for meeting the renamed Organization Standard "Operate Within Limits - Monitor and Assess Short-Term Transmission" . As such, this SAR does not rise to the level of "core reliability" Organization Standard.

The industry currently has in place regional processes for assessing and planning the power system under a variety of normal, abnormal, and extreme system conditions. The process should be continued, updated if necessary, and participation in the process should be a required activity by all industry participants.

SAR Commenter Information			
Name	Michael Desselle		
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American Electric Power (AEP) appreciates the opportunity to comment on the 10 most recent Standard Authorization Requests (SARs) and looks forward to working with NERC and other market participants to ensure the continued reliability of the electrical system.
Clearly the electricity industry has been exceptionally dynamic and fluid in recent years and is going through many changes. While changes can be positive, it is incumbent on the industry to ensure that changes, which are adopted result in enhanced reliability and a better market environment. With this in mind, we envision that there are actually three interrelated but separable processes with respect to the development of standards.

? First, the relevant standards need to be identified. Over recent months this has been referred to as defining "what" the standard is.
? Second, there need to be decisions about "how" these standards are to be achieved.
? Third, choices have to be made as to how these standards will be implemented.

The resultant standards, when implemented and operational, will potentially affect production, consumption and investment decisions. By necessity, the standards, including how they are achieved and implemented, are closely related to the design of the market and the separation of functions among market participants and service providers. For this reason, we encourage discussion and even preliminary definition of what core reliability standards are needed. However, we strongly urge restraint with respect to the other two aspects of the process – defining how the standards will be achieved as well as how they will be implemented. In our opinion, the latter two processes are highly integrated with the process of market design and implementation as well as market operation; the development of RTOs; and the definition of the NERC/NAESB interface.

Given that closure on many of the market design issues is expected in the near future, we see little risk in delaying the latter two processes – how the standards are achieved and implemented - until such time as clarity is achieved on Standard Market Design (SMD) and RTO formation. Moreover, since the NERC/NAESB interface will likely impact decisions on how standards will be achieved as well as how they will be implemented, it seems logical to wait until that interface has been defined.

We would prefer to see the SAR process simply make the threshold determination as to whether each of the proposed standards are needed, and then put on hold the actual development of those standards that are needed until the critical market development activities described above are closer to completion. Only at that point in time, will it be known whether the proposed standards cover the scope of performance needed to ensure reliability of the interconnected North American Grid. In the interim, AEP looks forward to continue working with NERC, NAESB and other market participants to develop and implement the appropriate standards.

Other comments: It is unclear to AEP what the intent was of this SAR . This SAR appears to have both market and reliability implications. As such, before moving forward to develop this SAR, AEP requests a further clarification of the specific intent. To the extent that this SAR is transitioning an existing standard from the old world to the new world (Functional Model), then the standard should not go beyond the original scope. Consistent with our general comments, once the clarity is achieved on Standard Market Design and RTO formations, then this standard should be revisited and reevaluated.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: General comment on entire set of SAR's and the overall process: Based on the short descriptions and the broad scope of most of these SAR's, it appears that these SAR's will encompass many of the existing planning and operating templates developed during the NERC pilot program. Experience obtained during the pilot program showed that many of the planning templates and some of the operating templates were difficult to interpret and even more difficult to measure for compliance, let alone determine exactly who the templates applied. Based on the scope descriptions given for each SAR, it appears these SAR's are written to encompass those same templates. Hopefully, the final standards will be written such that each standard is clear and concise as to how exactly the entity must comply for different levels of compliance and exactly which entities must comply for each measure of each standard. With the benefit of experience of the pilot program, Cinergy would like to suggest that since several of the measures in the existing templates are difficult if not impossible to actually measure for compliance, that some of these proposed standards or portions thereof not be developed into standards but instead be written as "good engineering practices". These "practices" could be used in the certification process for the various functions in the NERC Functional model such as Reliability Authority, Planning Authority, etc. We will try to indicate on each SAR, those portions that should be written as "practices". In the event that all eleven of these SAR's are approved to move forward, then the list should be prioritized and developed somewhat consecutively instead of simultaneously. We have already observed how difficult it is to stay abreast of the templates developed during the pilot as far as providing meaningful comments and review due to the sheer volume of documents distributed for review. Although there are only eleven SAR's, each SAR encompasses multiple measures, which will need to be defined in order to specify how each part is to be measured for compliance and to define what entities must comply for each part. Also since technical experts will be required to assist in the development of these standards, there will be a burden on resources if all of these are developed simultaneously since many of the standards could involve some of the same experts. The priority of developing each standard should be based on industry consensus of what are the major problems/issues that are threatening the reliability of the transmission grid today. Standards should be written so that performance can be measured as it affects overall grid reliability vs trying to measure practices or procedures.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate: entire standard

Other comments: This SAR should be developed as a "practice" to be used in the certification process for Planning Authorities and Reliability Authorities. Experience with the existing templates and NERC Table 1A shows how difficult it is to not only determining how to comply with this standard but to actually measure it for compliance. It is difficult if not impossible to determine if events will result in "cascading" - usually engineering judgment is used. It is also not practical to investigate every possible extreme or abnormal system condition to check for "cascading" - again engineering judgment is used. All of these factors makes measuring an entity for compliance very difficult if not impossible. Based on the ongoing development of RTO's and the open stakeholder process proposed for future planning studies, it does not appear that lack of planning will be an issue.

SAR Commenter Information			
Name	Jim Griffith		
Organization	Bulk Power Operations Southern Company		
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E-mail	jsgriffi@southernco.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Frequency control and processes standardized to speedy determine what are the problems contributing to poor frequency. What is considered "poor frequency"? Some SARs do not include critical participants that should be included.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: The scopes of these SARs range from small details to broad areas of responsibilities and overlap in many areas. It would seem that a top down approached would make better sense.

None

SAR Commenter Information			
Name	Peter Burke (submitting comments provided by numerous ATC contributors)		
Organization	American Transmission Company		
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E-mail	PBurke@atcllc.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: (1) ATC applauds the effort of the SAR's to acknowledge the dismantling of the vertically integrated utilities. However, some care needs to be given to defining the separated groups. For example, it is not always clear what is meant by Planning Group, Transmission Owner, Transmission Service Provider, and Transmission Operator, whether some groups are included in others, and whether there should or shouldn't be that inclusion. For each of the SAR's, there was some lack of confidence that the correct complying entities had been identified.

(2) Perhaps buried within the SAR's is a modeling component that will surface in the details, but none of these SAR's will accomplish their intent without credible models from which to do analysis.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: SAR #8 includes coordinated "planning". This language should be added here so that the Assessing and Planning of the Transmission System is coordinated. If modeling isn't addressed in the details it should be.

☐ The scope of the SAR should be reduced to eliminate:

Other comments: (1) It is not clear how market solutions would fit in providing reliable delivery of power for the future needs of customers. Market solutions could provide an interm solution to transmission constraints but they should not be used in planning future transmission needs.

Maybe the transmission service provider (TSP) should have some responsibility within this area as it relates to providing adequate transmission service to the market. If the TSP identifies a bottleneck on the transmission system creating problems transferring energy across the system, that should be included in future plans to try to eliminate that bottleneck.

The transmission operator, if not the same as the transmission owner, should have some responsibility in making sure the transmission owner knows about future improvements needed to improve it's system from an operational perspective.

(2) NERC should ensure that the standards defined within this SAR include a definition of how the planning model is created. Is there any way to come up with a standard for what gets included in the future models? For example, roll-over rights for transmission service, proposed generation facilities, proposed transmission facilities that require state approval and/or signficant right-of-way acquisition.

SAR Commenter Information			
Name	Bob Pierce		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: SARs should be developed that cover Operator Personnel and Training and Telecommunications reliability.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: The SAR should also apply to the following organizations because of their involvement in the planning process: Transmission Service Provider, Transmission Operator, Distribution Provider, Generator, Purchasing-Selling Entitiy, and Load-Serving Entity.

SAR Commenter Information			
Name	David Little		
Organization	Nova Scotia Power Inc.		
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E-mail	david.little@nspower.ca		
Is there a reliability-related need for an Organization Standard to be developed on this topic? ☒ Yes ☐ No ☒ Yes ☐ No The scope of the SAR is fine as it is			

SAR Commenter Information			
Name	Art Giardino		
Organization	Public Service Electric & Gas		
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E-mail	arthur.giardino@pseg.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: Too soon to proceed

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: Resources should not be expended on this SAR until FERC has specifyed the organization responsible for wholesale electric standards development.

SAR Commenter Information		
Name	Compliance Subcommittee	
Organization	SERC (Contact = Nancy Fallon)	
Telephone	704-892-6026	Fax
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: A lot of vital requirements of existing policies are not included in any of the proposed SARS, i.e., time error correction, inadvertent, etc.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: It appears that some of the SARS overlap and cover some of the same areas, such as "Prepare For and Respond to Emergency Conditions", "Prepare for and Respond to Blackout or Island conditions", and "Monitor and Analyze Disturbances, Events, and Conditions". These could all fall under a single Emergency Operations SAR. "Coordinate Interchange" should also fall under "Coordinate Operations". In addition, the SARS are intended to define standards for core reliability functions, i.e., "what to do". Some of the SARS really describe processes (i.e., "how to do it") rather than define standards, such as the SAR on "Determine Facility Ratings, Operating Limits and Transfer Limits". There are others that may need to be combined - it is suggested that a re-mapping of Policies to specific SARs should be done.

None

SAR Commenter Information		
Name	OPWG	
Organization	SERC (Contact = Nancy Fallon)	
Telephone	704-892-6026	Fax
E-mail	nfallon@serc1.org	

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within operating limits. We feel that this terminology (operating limits or other term such as Operating Security Limits) should be common among all SARs. The system must be planned so that it can be opearated reliably. Using this terminology in all SARs would provide the appropriate link among them.

Without knowing the details that will be included in the standards as described by these SARs, it is difficult to make an assessment on the completeness of this set of SARs. We feel that there should be a SAR that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.

None

SAR Commenter Information		
Name	Planning Standards Working Group (PSWG)	
Organization	SERC (Contact = Nancy Fallon)	
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?
☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Maintenance requirements should cover transmission equipment other than just protection and control equipment.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No
☒ Yes ☐ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☐ The scope of the SAR should be reduced to eliminate:
Other comments: For the Applicable Functions, TSP, T-owner, and T-operator could all apply. We question whether RA should be applicable. Was the RA inclusion possibly a holdover from when the Planning Authority was not developed?

The scope of this SAR seems rather large, perhaps it could be divided into more manageable pieces.

SAR Commenter Information			
Name	Gary Won and Don Tench Comments submitted on behalf of the Independent Electricity Market Operator (IMO)		
Organization	Independent Electricity Market Operator (IMO)		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No - see comments

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

Comments:

The proposed standards appear to provide the necessary coverage to ensure a reliable interconnected North American grid. A thorough review will need to be done to ensure that no necessary and significant performance requirement is missed that is in the current Operating Policies and Planning Standards. While the proposed SARs may cover the scope of performance needed, we have several concerns with the overall set at this stage of implementation;

1. The 'White Paper on NERC's set of Organizational Standards", dated April 11, 2002, clearly articulates a direction with which we agree. The paper proposes that 'these standards will define ***what*** performance must be achieved, without providing restrictive measures on ***how*** to achieve that performance'. This direction arose following industry experience with the very large set of current planning and operating standards and recognition by the industry that the current standards, in many areas, are too prescriptive of the 'how'. By focusing the industry on meeting less meaningful standards, the goal of maintaining reliability is actually put at risk. It is our belief that the proposed set of standards still focuses too much on the 'how', to the potential detriment of the overall objective.
2. Perhaps the most important aspect of a set of organization standards is to define to whom and to what the standards apply. The NERC Functional Model does a good job of providing a framework to define to whom the standards apply. However, what the standards apply to is left almost entirely open. What the standards apply to is variously described in the proposed SARs as the; transmission system, interconnected transmission system, network, power system, bulk electricity system and those facilities which affect reliability, among others. The white paper again provides valuable insight by defining the objective in terms of the 'interconnected electric systems in North America', however, this too is subject to individual interpretation. A definition of what the standards apply to, in terms of scope, is perhaps more important than the individual SARs. As such, I suggest that this scope needs to be developed through the SAR process. This needs to be addressed in a global fashion rather than relying on the development of a different scope for each SAR.
3. The proposed SARs deviate from the white paper direction to focus on reliability and delve into areas which are potentially outside of their scope such as; equipment damage, data sharing, procedures and studies. To the extent that these areas are performance related, the need is understood. However the development of past standards has shown that these areas often become part of a standard when they are really only one method of how a given level of performance can be achieved.
4. The 'High Level Map of Old Doc's to new Doc's' proposed by SAC (attached at the end of this package) provides a mapping of existing NERC planning and operating standards into the proposed new SARs. Each of the broad areas defined by the existing standards must be judged carefully against the 'White Paper' principles before even being included in the mapping. It is our belief that many will not pass this test.
5. The language of the proposed set of SARs struggle (understandably) to recognize the industry changes facing open electricity markets. Often they reflect a historic utility perspective including distinctions between 'planning' and 'operating' and emphasis on elements of 'pro forma' tariffs, which may no longer be relevant. To the maximum extent possible, the SARs must be developed to be independent of organizational and regulatory structures as well as respecting Regional and international differences. In our view, performance based standards are the best way to recognize this diversity.

We are very supportive of the goals NERC has set and would be glad to discuss further or participate more directly in their development.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No
☐ Yes ☒ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☒ The scope of the SAR should be reduced to eliminate:
The SAR must be rigorously tested against the White Paper requirements to specify what performance must be achieved rather than how to achieve that performance. For example, in what way is a standard for 'planning the transmission systems' a performance standard? Wouldn't such a standard be considered one means of determining whether a performance standard based on system behaviour (both present and future) is met?
Other comments: The Standard description implies that there should be a single transmission expansion plan. It reads as if there is or must be a single coordinated and minimum cost plan (same theme in the Planning Authority proposal currently being circulated for comment). In a market environment, there may be a need for multiple plans since the viability and timing of various generator projects (and the system enhancements that may be required for deliverability of their output) will be dictated by commercial rather than system adequacy considerations. Similarly the timing of merchant transmission projects will reflect commercial rather than system security considerations

A minimum set of criteria for assessing the acceptability of plans is needed. The NPCC A-2 (see www.npcc.org) document covers the aspects of ensuring against significant (disagree with the use of "extreme" in the SAR), adverse impacts over a wide area. Market systems also need criteria to determine when to initiate or order plans, or trigger some regulatory backstop if expansion plans are deemed to be insufficient to meet needs. (Must also define what minimum need is).

SAR Commenter Information		
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E-mail	scarp@bge.com	

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entiy(ies) is responsible for standards it will make sense to move forward with said entity.

Even if NERC wants to cover reliability standards, almost all standards have a reliability and commercial impact; thereby, necessitating developing a single process that incorporates both commercial and reliability aspects of standards development. The current NERC process risks being changed soon, discounts commercial aspects, and is not part of a finalized overall industry process.

Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entiy(ies) is responsible for standards it will make sense to move forward with said entity.

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Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entiy(ies) is responsible for standards it will make sense to move forward with said entity.

Even if NERC wants to cover reliability standards, almost all standards have a reliability and commercial impact; thereby, necessitating developing a single process that incorporates both commercial and reliability aspects of standards development. The current NERC process risks being changed soon, discounts commercial aspects, and is not part of a finalized overall industry process.

Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.

SAR Commenter Information		
Name	R. Scott Henry, Chairman	
Organization	Interconnected Operations Services Subcommittee, NERC	
Telephone	(704) 382-6182	Fax
E-mail	rshenry@duke-energy.com	

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: The IOS Subcommittee appreciates the opportunity of submitting comments on the ten SAR's posted by NERC. The IOS Subcommittee found the white paper most instructive in explaining the intent of this initial posting. Generally, the SAR's posted outline the topics for a reasonable first set of organization standards. Since much work is still to be done in developing the details of the SAR's and the related organization standards, a definitive statement on the comprehensive nature of these SAR's is premature at this point. The IOS Subcommittee does note that interconnected operations services are important components of several of the SAR's. NERC's IOS work, summarized in the IOS Reference Document in the NERC Operating Manual, has been substantive in identifying the minimum necessary components of interconnected operations services. Addressing more than simply the need to balance energy, the IOS work stresses the importance of responsive capabilities and controls necessary to achieve reliable bulk electric operation. The IOS Subcommittee recommends that the drafting of the proposed standards considers the IOS Reference Document and that IOS expertise be considered an essential competency of the standard drafting team.

In its discussion of these SAR's, the IOS Subcommittee identified three fundamental policy issues needing resolution prior to detailed work on development of these standards. First, the SAR's generally propose that the organization standards would apply to Service Functions contained in the Reliability Model, and they do not propose addressing the role of generators, loads, and others in provision and delivery of IOS's. The SAR's implicitly assume that the roles of others will be addressed through contracts. While the IOS Subcommittee does not necessarily disagree with this assumption (no consensus has been reached either way), there is a need to further explore the potential applicability of aspects of the proposed standard to others. This issue requires further debate and may serve as a critical precedent for the scope of other Organization Standards. Second, the "Assess Transmission Future Needs and Develop Transmission Plans" SAR proposes a standard to develop plans. None of the SAR's identifies who has the obligation to implement the plan. A plan without assignment or accountability for implementation is likely to provide no fruitful results. Third, the proposed standards and associated measures and criteria should not be any more restrictive than is necessary for a reliable bulk electric system. Market mechanisms for the provision of IOS should not be unnecessarily constrained. Market design is evolving rapidly, including for example, the ability to provide real time balancing services through bid-based mechanisms.

The IOS Subcommittee offers its assistance to the Standards Requestor(s) as further work is invested in development of these organization standards.

SAR Commenter Information			
Name	Jim Cyrulewski Manager -Michigan Electric Power Coordination Center		
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E-mail	cyrulewskij@dteenergy.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No
☐ Yes ☐ No The scope of the SAR is fine as it is
☐ The scope of the SAR should be expanded to include:
☐ The scope of the SAR should be reduced to eliminate:

Other comments: This is an ongoing function that will be coordinated by RTOs with transmission owners and market participants. Every RTO will have or already has a planning protocol on how long term transmission plans are developed. A standard is not needed to make this function occur. For those entities not in an RTO, a similar process will exist to develop long term transmission plans.

SAR Commenter Information			
Name	Kent Saathoff		
Organization	Kent Saathoff		
Telephone	(512)225-7011	Fax	(512)225-7020
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This SAR and the other posted SARs provide an appropriate framework for transitioning existing NERC Operating Policies and Planning Standards into new, NERC Organization Standards. Multiple compliance measures may be defined and developed for each of the eleven proposed Organization Standards. The Organization Standards and related compliance measures should focus on what functions must be performed for reliability, on who is responsible for each compliance measure for each required function and not, on how the compliance measure is achieved. The compliance measure must be measurable or demonstrable to ensure compliance.

Sound planning is the foundation for a reliable transmission system. Therefore a standard for defining transmission planning requirements is appropriate.

ERCOT believes the following issues should be considered in the development of this standard:

· The assessment leading to a transmission plan may be the most important aspect of this standard. Operational challenges must be identified, coordinated and remedial action plans made. Facility solutions usually require a longer time frame than the operating requirements allow.

· Incorporate a reasonable planning horizon - Sound planning must be based on reasonably accurate forecasts of future load and generation patterns. In the new competitive generation markets it is not possible to perform meaningful forecasts more than five years out. Attempting to do so is not a good use of scarce resources.

· Allowance of Remedial Action Plans (RAP) and Special Protection Schemes (SPS)– Major transmission construction that may be the preferred long-term answer to transmission reliability usually has a long lead-time. There should be provisions for the interim use of RAP and SPS in meeting the planning standard.

· Recognition of Regional differences - All standards should make allowance for reasonable differing regional requirements. Requirements may vary due to differences in climate, predominate generation type, transmission design standards, availability of interruptible load and market rules.

· FACTS devices are emerging as feasible solutions to transmission improvements. They should be considered in the development of standards for transmission planning and facility ratings (may include in SAR ID# FACILITY_RATINGS_01_01 as well).

SAR Commenter Information			
Name	Ronald Gunderson		
Organization	MAPP Reliability Council		
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E-mail	rogunde@nppd.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: We did not have adequate time to be sure all reliability areas are covered by these SARs.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: 1) a requirement to provide assessments at all demand levels 2) Transmission Service Providers should be included in the list of functions.

☒ The scope of the SAR should be reduced to eliminate: This standard should only apply to long-term planning functions. A parallel standard is required for operational planning.

SAR Commenter Information			
Name	Linda Clarke		
Organization	Exelon Corporation		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

The reliability policies, or "Organization Standards", must be specific and limited to standards based on the NERC-defined seven reliability principles and five market interface principles and not go beyond these areas. In addition, the NERC Organization Standards process must be coordinated with the process that will be established by FERC to develop busines practice standards.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: A SAR is not needed for a transmission expanision plan, since it includes "market solutions". Market solutions are outside NERC's scope with respect to the development of reliability policies or "Organization Standards".

SAR Commenter Information			
Name	Carter B. Edge		
Organization	Southeastern Power Administration		
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E-mail	cartere@sepa.doe.gov		
Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid? ☐ Yes ☒ No If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Time Error Corrections; Inadvertant Interchange			
Is there a reliability-related need for an Organization Standard to be developed on this topic? ☒ Yes ☐ No			

SAR Commenter Information			
Name	Warren Schaefer		
Organization	Dairyland Power Cooperative		
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E-mail	wjs@dairynet.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?
☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: We are not sure from the brief scope that is provided with each SAR that all the NERC Planning Standards and Operating Policies are covered.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No
☐ Yes ☒ No The scope of the SAR is fine as it is
☒ The scope of the SAR should be expanded to include: 1) a requirement to provide assessments at all demand levels 2) Transmission Service Providers should be included in the list of functions.
☒ The scope of the SAR should be reduced to eliminate: This standard should only apply to long-term planning functions. A parallel standard is required for operational planning.

Other comments: This is a reliability standard and should not include Market functions

SAR Commenter Information			
Name	Mike Miller		
Organization	Southern Company		
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E-mail	mbmiller@southernco.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within operating limits. I feel that this terminology (operating limits or other term such as Operating Security Limits) should be common among all SARs. The system must be planned so that it can be operated reliably. Using this terminology in all SARs would provide the appropriate link among them.

Without knowing the details that will be included in the standards as described by these SARs, it is difficult to make an assessment on the completeness of this set of SARs. I feel that there should be a SAR that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: Planning must be coordinated to optimize not only transmission but generation as well. The left alone process of disjointing generation and transmission is creating a non-steady state electrical system. The criteria for designing a system must include defined measurements adopted by all. This brief description does not provide sufficient detail to ensure reliability is planned. The planning criteria must address defined transmission planning for transfer usage as well as specific load service usage in other words interconnection as well as intraconnection. The need to define roles, responsibilities and authority must be developed between Federal (RTO) characteristics and functions and transmission owners.

☐ The scope of the SAR should be reduced to eliminate:

Other comments: Transmission Operator and perhaps Distribution Provider should be added to the list of applicable functions.

SAR Commenter Information			
Name	Jim Griffith		
Organization	Bulk Power Operations Southern Company		
Telephone	205-257-6892	Fax	205-257-6663
E-mail	jsgriffi@southernco.com		

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Frequency control and processes standardized to speedy determine what are the problems contributing to poor frequency. What is considered "poor frequency"? Some SARs do not include critical participants that should be included.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: The scopes of these SARs range from small details to broad areas of responsibilities and overlap in many areas. It would seem that a top down approached would make better sense.

None

SAR Commenter Information		
Name	Southern Company	
Organization		
Telephone	(205) *257-4222*	Fax (205) *257-1040*
E-mail	DGPIATT@southernco.com	

Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?
☐ Yes ☒ No
If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:
The new Organizational Standards must include the "How's" as well as the "What's" to just maintain the current level of reliability for the electric transmission system. The current NERC Planning Standards and Operating Policies, in general, document the body of good utility practice that provides that currently level of reliability seen in North America. If only the Standards ("What's") were published without the Measures ("How's") the new document will be woefully inadequate. The planning, design, construction, operation and maintenance of the electric transmission system are a very refined process of applied scientific principles and technology. The current proposed Organizational Standards create a level of ambiguity that will not adequately ensure the reliability of the grid is maintained at the levels seen today. Southern Company suggests that NERC consider withdrawing the entire proposed set of standards and reconsider its process for developing reliability standards. When posting standards for comment, NERC should consider a longer comment period. Thirty days is too short due to the amount of corporate coordination and information gathering required to submit meaningful responses.
With respect to the scope of reliability standards, the development of all reliability standards should be within the general context of ensuring that the grid is protected from uncontrolled or cascading interruption of network operation. None of the proposed SAR's fully addresses these basic operational requirements, although certain aspects of these requirements are contained within some of the SAR's. Therefore, it is recommended that NERC prepare an initial standard that establishes the minimum reliability requirements needed to prevent severe adverse events from occurring on our transmission system, i.e. uncontrolled or cascading interruption of network operation. This pivotal standard - call it "MINIMAL OPERATIONAL REQUIREMENTS" - would address such basic reliability considerations such as

- No operator should knowingly operate in a manner that inappropriately affects the reliability of another entity
- No operator should allow operation of the system in such a manner that inappropriately risks cascading outage of the network or violates an operating security limit.
- No operator should allow operations that violate safety standards established by the National Electric Safety Code, ANSI Standards, IEEE, etc….
- No operator should allow operations outside established equipment ratings
- Etc.

These may or may not represent the appropriate set of minimal reliability considerations, and are offered for illustrative purposes only. Once this pivotal standard has been established and fully vetted, all future SAR's can be developed within the context of these basic requirements. If it were deemed necessary to increase or adjust these pre-established minimum levels, the pending adjustments would need to be fully vetted in both the commercial and the reliability forums.

Is there a reliability-related need for an Organization Standard to be developed on this topic?
☒ Yes ☐ No
☐ Yes ☒ No the scope of the SAR is fine as it is
☒ The scope of the SAR should be expanded to include:
The scope of this SAR is poorly written and does not adequately represent or convey the transmission planning functional responsibilities. A better way to phrase the purpose could be:
To establish a standard for evaluating the performance of the transmission system to ensure that appropriate levels of functionality and reliability are achieved in both the short-term and long-term time frames.
☐ The scope of the SAR should be reduced to eliminate:
Other comments:
The "Brief Description", once again, is poorly written and does not represent transmission planning in general.
The I.A. Planning Standard is a very functional standard with the exception of S3.M3 and should be

followed very closely as a template to the developing the scope of this SAR.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: responsibility for maintaining adequate operating reserves and reactive support. (Perhaps to be included in SAR on "Balancing Resources and Demand"?); responsibility for assessing and defining what are adequate operating reserves and reactive support. (Perhaps to be included in SAR on "Developing Transmission Plans"?)

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: responsibility for assessing and defining what are adequate operating reserves and reactive support.

☐ The scope of the SAR should be reduced to eliminate:

Other comments: Load and Generator entities are just as integral as Transmission Owners to the planning of the system. This should incorporate the responsibilities of all entities to provide information necessary for assessment.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: Standard requirements that establish a consistant and reliable measure to evaluate the transmission system must be developed and maintained to insure that the transmision system can perform safely and reliably. Requirements that address normal, abnormal, and extreme conditions need to be defined. Standard protocol need to be enforced that addresses future operating conditions of the transmission system that will ensure that events such as uncontrolled seperation or cascading does not occure during any single contingency.

SAR Commenter Information			
Name	Scott Helyer		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: On SAR ID# PHYSCAL_CON_REQ_01_01, it appears that specifying requirements for operating limits and AGC go beyond the Physical Connection Requirements. We need to ensure that this Standard would not overlap another reliability standard on operating limits and that we do not create a reliability requirement that AGC is needed for all generators when the market should decide which generators require AGC. Writing a standard that indicates how AGC should be provided if a generator wishes to provide such a service would be acceptable.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?
☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: Several of the SAR's contain market related issues. These should be delayed until FERC final ruling on Standardized Transmission Service and Wholesale Electric Market Design

The scope of the SAR should be reduced to eliminate: This SAR proposes "the plan may utililize operating, construction, market solutions or other components to address these conditions." Market solutions requires this standard be developed by a process that take into account market along with reliability interests.

SAR Commenter Information			
Name	Chifong Thomas		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid? ☐ Yes ☒ No If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: We need to add flexibility to allow for Regional differences in all the SAR's. We also need application criteria to provide guidance on when SPS should be applied as permanent measures and when it should be applied as temporary measures to mitigate potential system problems.			
☒ Yes ☐ No ☒ Yes ☐ No The scope of the SAR is fine as it is			

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Application criteria for SPS (or Remedial Action Scchemes) should be included. SPS, thought may be considered as some form of protection and control measure, is applied for many different purposes which may be systems related and not necessary equipment protection related. Clear criteria are needed for consistant application of SPS (RAS) and when SPS (RAS) could be considered as an alternative to mitigate for system deficiencies. Planning criteria need to provide guidance on when SPS should be applied as permanent measures and when it should be applied as temporary measures to mitigate potential system problems. Special Protection Schemes, Protection Schemes and Control Schemes should all be treated separately.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include:

1) Planning criteria should be expanded to include maintainability of the system. Simple mitigation measures such as removing equipment out of service during lightly loaded and off-peak hours, to make system adjustments and to allow equipment protection against high voltage conditions may not be considered practical since it may crate N-1 operating conditions. Also, possible overall system deficiencies for interconnected systems may not allow such prudent practices such as removing equipment from service.

2) Establish a separate SAR for implementation of various types of SPS - Identify criteria for application of each type such as:
Overload mitigation, Adaptive overload mitigation schemes, UFLS, UVLS, stability related schemes, etc.

3) Develop a plan to address operating issues for interconnected grids systems where SPS is used systematically to mitigate against many different types of system deficiencies within a Region, operating in a coordinated manner with multiple mitigation measures simultaneously operating in parallel creates increased potential for cascading outages following an un-planned outage.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: See individual SAR comments.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: See individual SAR comments.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☒ The scope of the SAR should be expanded to include: More detail is needed about what is required in order to write this standard.

☒ The scope of the SAR should be reduced to eliminate: Developing plans. The SAR should only address the creation of Planning Standards - Plan Development is a compliance issue.

Other comments: As written, this SAR does not set a standard, but rather seems to try to assign responsibility for setting the standard.

SAR Commenter Information			
Name	Mr Paul Tremblay, Mr. Mike Penstone, and Mr Ajay Garg		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

The design of Bulk Electric System is complex and its performance depends upon a variety of factors including but not limited to, designs, configurations, designs, technologies, operating practices, etc. The proposed standards should focus upon required performance objectives and methods of measuring success or failure(ie. PERFORMANCE BASED CRITERIA standards) rather than prescribing the means to achieve these objectives.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed:

As above, standards should not prescribe processes nor means of achieving an outcome. This has been done, effectively, by NPCC for over 25 years.

NERC standards should facilitate in the establishment of Region/RTO/Area specific standards that will meet the NERC performance standard.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☒ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate:

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing:

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: I do not think it is appropriate at this point in the process to define the Reliability Functions that are associated with the Standard and cast them in concrete (which Maureen has indicated is the case). As the standards are drafted. issues may come up that need to be includeded that will require coverage by other reliability functions. If they are defined early in the porcess, they should be subject to revision later as necessary.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: The description should be modified to only include "performance under a variety of PLAUSIBLE system conditions". Why aren't the load and generator functions involved in this standard? Aren't they the ones the system is built for? As I mentioned above, I believe that making the connection between Reliability Functions and the SAR should be deferred until later in the process.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: Drafting team should rely heavily upon existing NERC Reliability Criteria in the development of this standard.

Should include Generator and LSE to the list of functional entities to which this standard would apply. Generators and loads are both key factors in the planning process for future transmission needs and should therefore be subject to the requirements of this standard.

SAR Commenter Information		
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: There is inadequate detail provided to allow a determination of whether the proposed set of Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American Grid. The answer to this question will depend upon the specifics included in each SAR. Detailed SARs must be developed and recirculated before any work begins on development of detailed Organization Standards. These SAR's should be specific about the WHAT of what is the reliability requirement and WHO is obligated to comply (but does not necessarily need detail as to HOW and should not set commercial practices as to HOW to comply) .

Illinois Power suggests the following approach to developing an adequately detailed SAR:

1) For each Function, determine what are the necessary standards to which the provider of that function should be held to in order to ensure reliability. This should not be a wholesale transfer of existing NERC Operating Procedures and Planning Standards into Organization Standards.

2) Consideration should be given to having Standards that apply clearly for each Function rather than multiple Functions being addressed within topical Standards. In that way a Balancing Authority, for example, would only need to be concerned with one Standard, not sorting through multiple standards to figure out what applies to them. Much easier for training their people, keeping track of changes, etc.

3) Each SAR should clearly identify specific and measurable requirements. This aspect is key and should not be left to the later development work, nor should the Standard Writers have authority to expand the specific, measurable reliability requirements without coming through the SAR process.

Should NERC decide to proceed based upon the information submitted for comment, Illinois Power has provided specific comments on each SAR.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: See above

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☐ Yes ☐ No **THE INTENT OF THIS STANDARD IS UNCLEAR SUCH THAT WE CANNOT DETERMINE IF THERE IS A NEED**

☐ Yes ☒ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate: Reliability Authorities: In reviewing a Reliabilty Authorities responsibilities, it does not appear to Illinois Power that the RA has any responsibility to assess FUTURE needs or develop FUTURE plans, and therefore would not be subject to this Standard

Other comments: There is inadequate detail in the SAR to determine if the scope of the SAR is appropriate and adequate. A standard in this area should focus on the minimum frequency of assessment and the definition of normal, abnormal, and extreme conditions that must be studied. The creation of a plan should not be a measurable standard as implied in this SAR. Nor should the Standard require specific operating, construction, or market solutions. It should only define the reliability requirements

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Flexibility allowing for Regional differences in all the SAR's.

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: Further comments on SAR's will clarify some of our thoughts.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: A separate Standard should be developed related to operational planning requirements. In your proposed SARs, the operational planning function is included in SAR 1 along with the new facility planning function. Although there are a lot of similar activities requiring similar tools in either function the criteria system consideration and level of detail involved is quite different. Therefore they should be two Separate SARs to address the Standards requirement relative to these activities. Further discussed in SAR1 comments

If you believe there are some performance areas that are included in the proposed set of Organization Standards but are not needed, tell us what you believe is not needed: SAR 7 "Coordinate Interchange" as written seems to reference the function of creating transactions which is a Business Standard. This SAR to reference the reliability requirements of interchange should be related to SCHEDULED Transactions and the data and monitoring requirements associated with this activity. This is further discussed in SAR7.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate: functionality related to assessing transmission performance and relate only to planning future transmission expansion.

Other comments: This SAR's Purpose/Industry Need should be modified in the following way:

the Purpose statement should have the word "assessing" removed so it addresses a planning function only.

The Industry Need comment should be changed to the following "The transmission system must be planned to ensure the reliable delivery of energy and power to meet the needs of customers. A reliable supply of electricity is essential to ensure the safety and economic viability of modern North American society."

Transmission Service Provider should also be included in the list of complying functions.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☒ Yes ☐ No

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☒ Yes ☐ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☐ The scope of the SAR should be reduced to eliminate:

Other comments: These comments apply to the complete set of Proposed Organization Standards. Among the set of SARs, the references to "Reliability Function(s) That Would Need to Comply With This Standard" is not consistent. Ensure the "Function Definitions" from The NERC Functional Model are used consistently throughout. All of the "Reliability Principle(s)" should be listed first to ensure the reader knows what all of them are. In the SAR form they are referred to as "Reliability and Market Interface Principles". It appears that the term "interconnected bulk electric systems" is not consistently used.

The Brief Description refers to "or other components to address these conditions." The vagueness is problematic as was discovered in the crafting of the original NERC Planning Standards.

SAR Commenter Information			
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Does this set of Proposed Organization Standards cover the scope of performance needed to ensure reliability of the interconnected North American grid?

☐ Yes ☒ No

If you believe there are some performance areas not covered with the proposed set of Organization Standards, tell us what is missing: Need to add standards covering Reliability Authority responsibilities and authority; and Telecommunications.

Is there a reliability-related need for an Organization Standard to be developed on this topic?

☒ Yes ☐ No

☐ Yes ☒ No The scope of the SAR is fine as it is

☐ The scope of the SAR should be expanded to include:

☒ The scope of the SAR should be reduced to eliminate: market solutions" in the last sentence of the Brief Description.

SAR Drafting Team Roster
Assess Transmission Future Needs & Develop Transmission Plans

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