

*Note – This form is to comment on version 2 of the Coordinate Operations SAR.*

*The latest version of this SAR (COORD\_OPERATIONS\_01\_02) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between February 14–March 17, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

*Please review the changes made to the SAR and answer the questions in the yellow boxes.*

*If you have any questions about this SAR Comment Form, please contact Tim Gallagher, NERC’s Director of Standards at 609-452-8060 or [timg@nerc.com](mailto:timg@nerc.com)*

## **Background**

The “Coordinate Operations ” SAR was posted for its first, 30-day public comment period from April 2, 2002 through May 3, 2002. Comments were received from many different sources, including individuals, small and large utilities, groups of utilities, Regional Councils, and NERC Subcommittees.

The original SAR provided a brief description, but did not include many details and the comments submitted by Industry Participants indicated that the SAR needed more definition. The requested details have been provided in the revised SAR.

When developing this revised SAR, the SAR DT made the following assumptions:

- The Reliability Authority function (RA) will sign a code of conduct and NERC Data Confidentiality Agreement as part of the RA Certification process
- Data needed by the RA is addressed through other SARs
- Data from the RA’s analyses is disseminated by the RA to its lower level functions and is addressed through other SARs
- Coordination required for Interchange is addressed through other SARs

The SAR DT asks that you review the revised SAR and respond to the questions in this comment form. If you have questions, you can contact the Director of Standards, Tim Gallagher in the NERC office. Tim can be reached at 609-452-8060 or at [tim.gallagher@nerc.com](mailto:tim.gallagher@nerc.com).



**1. The SAR has been revised to clearly state that the scope of activities covered is restricted to Reliability Authority (RA) to RA coordination. Do you agree with this modification to the scope of the SAR?**

Yes

No

**Comments:**

**2. Does this SAR contain any requirements that are not needed for reliability?**

Yes

No

**Comments:**

**If yes, please identify what you think is listed in this SAR but is not needed for reliability.**

**3. Are there terms used in this SAR that you feel should be defined?**

Yes

No

**If yes, please list the terms you feel should be defined and if possible, provide a draft definition:**

## SAR Comment Form for 2nd Posting of Coordinate Operations SAR

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The following requirement was added to the detailed description of the SAR:

- Document Authority
  - When one RA's system has had an adverse impact<sup>1</sup> on another RA's system, the RA that caused the problem shall have the authority to take actions (within its own RA Area) to mitigate the problem.

**4. Do you agree with this requirement?**

- Yes  
 No

**Comments:**

The following requirement was added to the detailed description of the SAR:

- Develop and Share Unique Operating Procedures
  - Unique operating procedures that address identified potential operating scenarios that may impact neighbor RA's or the Interconnection shall be developed, and distributed to all involved parties.

**5. Do you agree with this requirement?**

- Yes  
 No

**Comments:**

The following requirement was added to the detailed description of the SAR:

- Analyze Maintenance Outages
  - Analyze the impact of generation outages from a reliability perspective
  - Analyze the impact of transmission outages from a reliability perspective

**6. Do you agree with this requirement?**

- Yes  
 No

**Comments:**

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<sup>1</sup> The impacts in this SAR are those that if left unattended could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the interconnected bulk transmission system

The following requirement was added to the detailed description of the SAR:

- Perform Security Analyses
  - The RA shall ensure that reliability analyses (including but not limited to a day-ahead analysis) are performed for all Transmission Operators (TOP's) in its Reliability Area and that such analysis is coordinated with similar analysis performed by neighboring RA's. The purpose of these analyses is to look at the impact of one RA's system on other systems and to assure that the interconnected bulk power system can be operated in both anticipated normal and contingency conditions.

**7. Do you agree with this requirement?**

- Yes
- No

**Comments:**

The following requirement was added to the detailed description of the SAR:

- Perform Generation Resource Availability Analyses
  - Each RA shall analyze generation resource availability for its impact

**8. Do you agree with this requirement?**

- Yes
- No

**Comments:**

The following requirement was added to the detailed description of the SAR:

- Share Results of Analyses
  - The RA shall share the results of its system analyses, when conditions<sup>2</sup> warrant, or upon request, with other RA's, and other involved entities within its Interconnection.

**9. Do you agree with this requirement?**

- Yes
- No

**Comments:**

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<sup>2</sup> The conditions referenced are those that if, left unattended, could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the interconnected bulk transmission system.

The following requirement was added to the detailed description of the SAR:

- . Communicate with Others
  - The RA shall notify other impacted RA's under the following circumstances:
    - If a generator or transmission outage will impact another RA within the same Interconnection
    - If outages of information technology (IT) systems (telemetry, communications, and/or control equipment or other information systems) impact the ability of one RA to receive/send data or voice communications
    - If the results of analyses or real-time conditions indicate potential or actual reliability problems
    - If the actual interconnection frequency is outside the defined interconnection frequency limits

**10. Do you agree with this requirement?**

- Yes
- No

**Comments:**

The following requirement was added to the detailed description of the SAR:

- . Act with Others
  - Communicate with other RA's to identify and implement a solution to prevent/resolve actual/impending operating problems such as:
    - Reliability problems that can't be resolved through existing procedures
    - Interconnection frequency outside the defined interconnection frequency limits
    - Prioritization of transmission outages
    - Prioritization of IT outages

**11. Do you agree with this requirement?**

- Yes
- No

**Comments:**

**12. Are you aware of any Regional or Interconnection Differences that should be included in this SAR?**

**Yes**

**No**

**Comments:**

**If yes, please identify what you feel should be added.**

**13. Is the revised SAR missing any requirements that should be added?**

**Yes**

**No**

**Comments:**

**If yes, please identify what you feel should be added.**

**14. If there are any requirements that you feel can not be measured, please identify them here.**

**Comments:**

## **SAR: Coordinate Interchange Transactions**

Title of Proposed Standard:	Coordinate Interchange Transactions
Request Date:	March 7, 2002
Authorized for Posting:	March 20, 2002
SAR ID# :	COORD_INTERCHNG_01_03

<b>SAR Requestor Information</b>		<b>SAR Type</b> (Put an 'x' in front of one of these selections)	
Name:	Jim Byrd (Albert DiCaprio as substitute)	X	New Standard
Primary Contact:	(Al DiCaprio)		Revision to existing Standard
Telephone:	610 666-8854		Withdrawal of existing Standard
Fax:			
e-mail:	dicapram@pjm.com		Emergency Action

### **Purpose/Industry Need (Please see diagram attached)**

To ensure that the implementation of Transactions between Sink and Source Balancing Authorities are coordinated by the Interchange Authority such that the following reliability objectives are met:

- Each Interchange Schedule is checked for reliability before it is implemented
- The Balancing Authorities implement the Interchange Schedule exactly as agreed upon in the Interchange Confirmation process
- Interchange Schedule information is available for reliability assessments

### **For the purpose of this SAR, the following definitions have been adopted:**

- **INTERCHANGE TRANSACTION.** A request for an Interchange Schedule. A commercial agreement arranged by a Purchasing-Selling Entity to transfer energy from a seller to a buyer.
- **TRANSACTION.** A commercial agreement arranged by a Purchasing-Selling Entity to transfer energy from a seller to a buyer.
- **INTERCHANGE SCHEDULE.** An authorized transaction, approved by all entities, that is implemented between a BA and IA. It becomes part of the Net Scheduled Interchange in the ACE equation.
- **TRANSMISSION GRID EMERGENCY.** Any event with the transmission grid that causes the violation of or the impending violation of any reliability standard.

## ***SAR: Coordinate Interchange Transactions***

### **Brief Description**

To ensure reliability related data pertaining to interchange transactions is verified and communicated to functional authorities. Reliability related data to be verified should include megawatt magnitude, ramp start and stop times, and the interchange transaction's duration. Reliability related data should be communicated by and between the Interchange Authority, Balancing Authority, Reliability Authority, Transmission Service Provider, and Purchasing-Selling Entity functions.

Verification of data should indicate that a mutual agreement exists between parties that intend to implement a proposed interchange transaction as well as approval by the appropriate functional authorities.

To provide a mechanism for transaction identification that could be used for congestion management and/or relieving operating limit violations.

## **SAR: Coordinate Interchange Transactions**

### **Reliability Functions**

<b>The Standard will Apply to the Following Functions</b> <i>(Put an 'X' in front of each one that applies)</i>		
X	Reliability Authority	Ensures the reliability of the bulk transmission system within its Security Authority Area. This is the highest reliability authority.
X	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
X	Interchange Authority	Authorizes valid and balanced Interchange Schedules
	Planning Authority	Plans the bulk electric system
X	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
	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
X	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: Coordinate Interchange Transactions**

**Reliability and Market Interface Principles**

<b>Applicable Reliability Principles</b> <i>(Put an 'x' in front of all that apply)</i>	
X	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions
X	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
X	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems
	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
<b>Does the proposed Standard comply with all of the following Market Interface Principles?</b>	
<i>(Enter 'yes' or 'no')</i>	
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

## **SAR: Coordinate Interchange Transactions**

**Detailed Description: This standard will include requirements for the exchange of reliability-related data pertaining to Interchange Transactions.**

**The standard shall contain the following requirements for the BA:**

- When an entity desires to transfer energy to another BA's area, the entity initiating the transaction shall submit as a minimum the following reliability-related transaction data to its IA:
  - Desire to transfer energy to another BA's area
    - Megawatt magnitude
    - Ramp start and stop times
    - Interchange transaction's duration
    - Sufficient information for all approval entities
- BA to coordinate with the IA the ability of the entity to meet the ramp and verify they will meet the duration.

**The standard shall contain the following requirements for the IA:**

- The IA shall confirm the approvals from all involved parties and shall authorize, upon confirming approvals, the implementation of Interchange Schedules
- Upon confirmation of the Interchange Transaction all involved parties of the IA shall implement the Interchange Transaction
- The IA will communicate reliability related data with all parties (with which the Interchange Transaction must be coordinated) including the RA(s) and TSP(s)

**The standard shall contain the following requirements for the RA:**

- The RA shall be capable of receiving from and confirming Interchange Transaction information with the IA
- The RA shall approve or deny the request from the IA

**The standard shall contain the following requirements for the TSP:**

- The TSP shall be capable of receiving from and confirming Interchange Transaction information with the IA
- The TSP shall approve or deny the request from the IA

**The standard shall contain the following requirements for the PSE:**

- The PSE shall request approval for interchange transactions from the IA
- The PSE shall communicate parked transactions to the IA
- The PSE shall confirm interchange transaction requirements with the IA

### ***Related Standards***

<b>Standard No.</b>	<b>Explanation</b>

## **SAR: Coordinate Interchange Transactions**

### **Related SARs**

<b>SAR ID</b>	<b>Explanation</b>
BAL_RES_&_DEMND_01_03	The "Balance Resources and Demand" SAR identifies requirements matching resources with demand. Some of the data required to ensure "balance" comes from transactions and is referenced in this Coordinate Interchange SAR.
OPER_WITHN_LMTS_01_02	The "Operate Within Transmission Limits – Monitor and Assess Short Term Reliability" SAR includes requirements that the RA monitor the overall reliability of the RA Area. This includes the requirement that data be collected and analyzed to ensure security. Some of the data collected for security analyses is included in this Coordinate Interchange SAR.
COORD_OPERATONS_01_01	The "Coordinate Operations" SAR may include requirements such as entering data into the IDC. The data for this comes from Interchange.

### **Regional/Interconnection Differences**

<b>Region</b>	<b>Explanation</b>
ECAR	none
ERCOT	<p><b>ERCOT:</b> As a single Control Area (Balancing Authority) interconnection there are no true Interchange Schedules in ERCOT. The only Interchange is over DC ties which will have unique requirements.</p> <p><b>Oncor:</b> ERCOT has an Interconnection Difference by Legislative direction for retail choice. There are no transmission reservations requirements and generation/load schedules are part of the real-time competitive market.</p>
FRCC	none
MAAC	none
MAIN	none
MAPP	none
NPCC	none
SERC	none
SPP	none
WECC	none

### **Implementation Plan**

<b>Description (Preliminary.)</b>
Portions of Policy 3 will be deleted when this SAR is implemented. Policy 3 contains some procedures that may need to be transformed from Policies into commercial practices or supporting documents in concert with the implementation of this new standard.

## **SAR: Coordinate Interchange Transactions**

### **Team Assignments**

"Coordinate Interchange" SAR Drafting Team

Chairman: Doug Hils

Secretary/Facilitator: Gordon Scott

Requestor: Jim Byrd (Albert DiCaprio as substitute)

Industry Representatives:

Diane Barney

Linda Clarke

Jim Cyrulewski

Nick Henery

Carolyn Ingersoll

Adrian Malo

Dave McGinnis

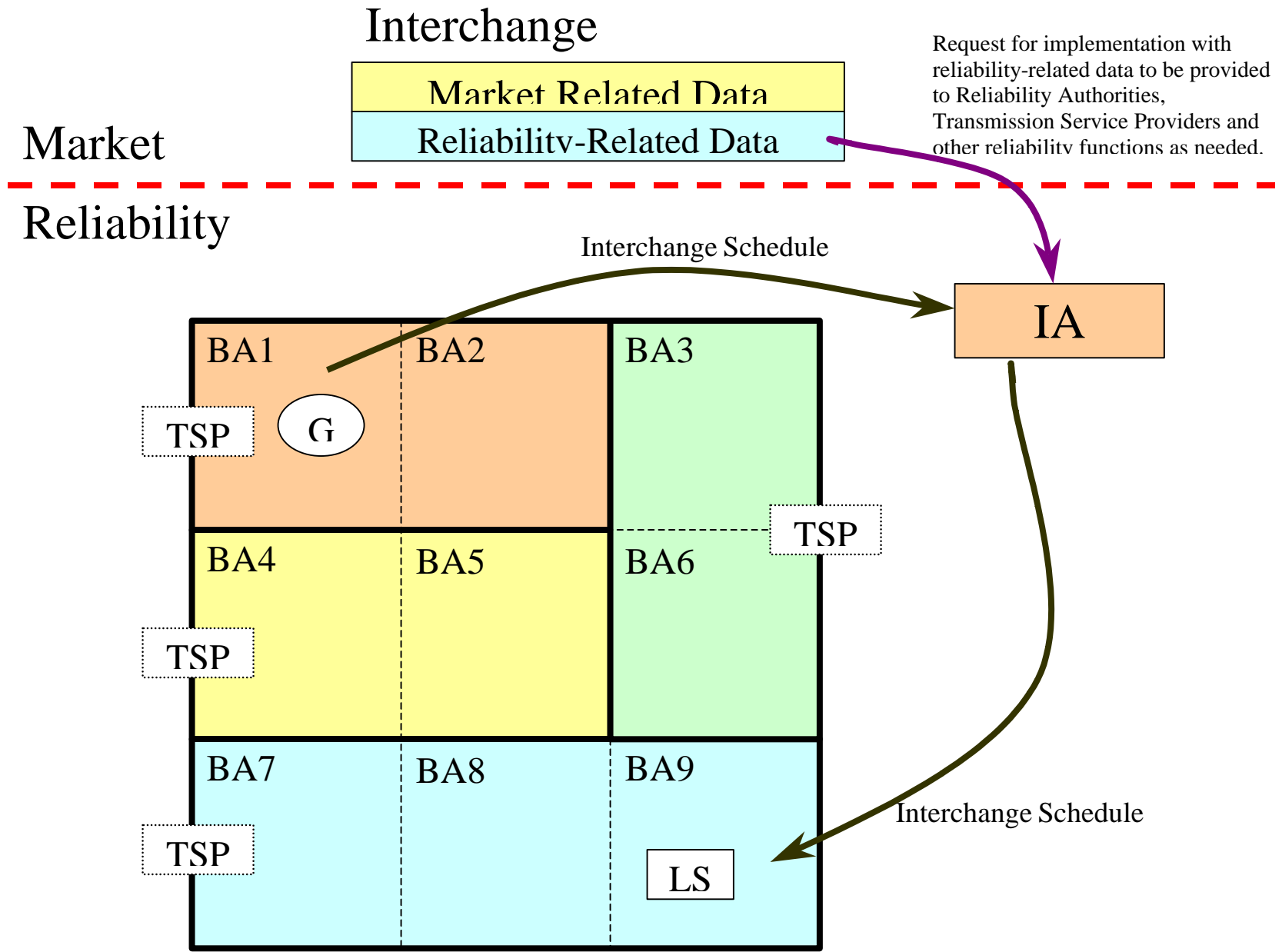
David McRee

Jim McIntosh

Joel Mickey

Monroe Landrum

Charles Yeung



*Note – This form is to comment on version 3 of the Coordinate Interchange Transactions SAR.*

*The latest version of this SAR COORD\_INTERCHNG\_01\_03) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between January 31, 2003 – March 3, 2003, to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

*Please review the changes made to the SAR and answer the questions in the yellow boxes.*

If you have any questions about this SAR Comment Form, please contact Tim Gallagher, NERC’s Director of Standards at 609-452-8060 or [timg@nerc.com](mailto:timg@nerc.com)

## **Background**

The “Coordinate Interchange” SAR was posted for its second, 30-day public comment period from August 29, 2002 through September 30, 2002. Comments were received from many different sources, including individuals, small and large utilities, groups of utilities, Regional Councils, and NERC Subcommittees.

The original SAR did not provide many details and the comments submitted by Industry Participants indicated that the SAR needed more definition.

The second posting of the SAR tried to add more definition. Comments from industry participants highlighted some inaccuracies in the second version of the SAR, and these corrections are reflected in the current version (version three) of this SAR.

This SAR has four significant changes from its prior version. All of these changes were made as a result of the comments submitted on the last posting of the SAR.

1. The Purpose has been modified by adding the words, ‘Sink and Source’ to clarify that the transactions addressed in the proposed standard are between Sink and Source Balancing Authorities.
2. The original Detailed Description contained the following step that was technically incorrect. In the revised SAR this step has been corrected. This was incorrect because in the future, information about interchange will be exchanged between the BA and an IA, and not between the BA’s.
6. The Balancing Authority receiving data from an Interchange Authority communicates the Net Scheduled Interchange to the neighboring Balancing Authority receiving data from the Interchange Authority.

## **SAR Comment Form for 3<sup>rd</sup> Posting of Coordinate Interchange Transactions SAR**

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3. A list of definitions was added as background information supporting the SAR. The terms “transactions” and “schedules” were exchanged to ensure that they were used consistently throughout the SAR.
4. The detailed description was revised to improve clarity. In the last version of the SAR, some of the steps in the process were identified, but the requirements to support accomplishing the step weren’t listed in the detailed description.

During the course of evaluating the comments on the last posting of the SAR, the Functional Model was undergoing review for a possible update to more closely align with the FERC SMD NOPR. Members of the SAR DT met with the Functional Model Review Task Group to ensure that the SAR would not need to be adjusted to conform with the changes to the Functional Model being considered. The SAR DT determined that this third version of the SAR conforms to the Functional Model and will not need to be changed to conform with the changes currently being considered to the Functional Model.

The SAR DT feels that this SAR is ready to move forward in the Standards Development Process. If you agree with this, then the SAR will be forwarded to the SAC for its review. If the SAC agrees that there is industry consensus on the need for this standard and on the scope of this standard, then the SAR will be forwarded to the NERC/NAESB Joint Interface Committee (JIC). The JIC will determine whether this standard should be developed as a reliability standard with NERC leading the effort, or by NAESB as a business practice standard, with NAESB leading the effort.

**SAR Comment Form for 3<sup>rd</sup> Posting of Coordinate Interchange Transactions SAR**

<b>SAR Commenter Information (For Individual Commenters)</b>	<b>Key to Industry Segment #'s:</b> 1 - Trans Owners 2 - RTOs, ISOs, RRCs 3 - LSEs 4 - TDUs 5 - Generators 6 - Brokers, Aggregators, and Marketers 7 - Large Electricity End Users 8 - Small Electricity Users 9 - Federal, State, and Provincial
Name	
Organization	
Industry Segment #	
Telephone	
E-mail	

<b>SAR Commenter Information (For Groups Submitting Group Comments)</b>		
<b>Name of Group:</b>	<b>Group Chair:</b> <b>Chair Phone:</b>	
<b>List of Group Participants that Support These Comments:</b>		
<b>Name</b>	<b>Company</b>	<b>Industry Segment #</b>

**1. Do you agree with the definition provided for Interchange Transaction?**

(Definition of Interchange Transaction: A request for an Interchange Schedule. A commercial agreement arranged by a Purchasing-Selling Entity to transfer energy from a seller to a buyer.)

- Yes
- No
- Neutral

Comments:

**2. Do you agree with the definition provided for Transaction?**

(Definition of Transaction: A commercial agreement arranged by a Purchasing-Selling Entity to transfer energy from a seller to a buyer.)

- Yes
- No
- Neutral

Comments:

**3. Do you agree with the definition provided for Interchange Schedule?**

(Definition of Interchange Schedule: An authorized transaction approved by all entities that is implemented between a Balancing Authority and Interchange Authority. It becomes part of the Net Scheduled Interchange in the ACE equation.)

- Yes
- No
- Neutral

Comments:

**4. Do you think Transmission Grid Emergencies should be included in this SAR or should they be addressed in the SAR called, "Prepare for and Respond to Abnormal or Emergency Conditions"?**

- Yes
- No
- Neutral

Comments:

**5. If you do think that Transmission Grid Emergencies should be addressed in this SAR, do you agree with the following definition of a Transmission Grid Emergency?**

(Definition of a Transmission Grid Emergency: Any event with the transmission grid that causes the violation of or the impending violation of any reliability standard.)

- Not Applicable
- Yes
- No
- Neutral

Comments:

**The SAR DT modified the original SAR to add more details, as requested by industry comments. Please review each of the following changes and indicate whether or not you support the clarification.**

**Detailed Description's original text regarding Balancing Authority requirements:**

1. The desire to transfer energy between Balancing Authorities is conveyed to the Interchange Authority.
2. Reliability related transaction data is submitted to the Interchange Authority by the requesting party.

**Modified text with revised Balancing Authority requirements:**

- When an entity wants to transfer energy to another BA's area, the entity initiating the transaction shall submit as a minimum the following reliability-related transaction data to its IA:
  - o Desire to transfer energy to another BA's area
    - Megawatt magnitude
    - Ramp start and stop times
    - Interchange transaction's duration
    - Sufficient information for all approval entities
- BA to coordinate with the IA the ability of the entity to meet the ramp and verify they will meet the duration.

**6. Do you agree with the revised requirements for the Balancing Authority?**

- Yes
- No
- Neutral

Comments:

**Detailed Description's original text regarding Interchange Authority requirements:**

3. The Interchange Authority submits transaction data to the TSP that verifies and approves transmission availability.
4. The Interchange Authority communicates the transactions' status on transmission service approval to the requesting parties
5. The Interchange Authority communicates only approved and verified Interchange Schedule data to the Balancing Authority and the Reliability Authority.
8. The Interchange Authority communicates the transactions' status regarding implementation to the requesting parties

**Modified text with revised Interchange Authority requirements:**

- The IA shall confirm the approvals from all involved parties and shall authorize, upon confirming approvals, the implementation of Interchange Schedules
- Upon confirmation of the Interchange Transaction all parties of the IA shall implement the Interchange Transaction
- The IA will communicate implementation status to all parties

**7. Do you agree with the revised requirements for the Interchange Authority?**

- Yes  
 No  
 Neutral

Comments:

**Detailed Description with original text regarding Reliability Authority requirements:**

7. The Reliability Authority performs congestion management security studies and approves or denies the Interchange Schedule, and communicates approved Interchange Schedules to the Interchange Authority.

**New text with revised Reliability Authority requirements:**

- The RA shall be capable of receiving from and confirming Interchange Transaction information with the IA
- The RA shall approve or deny the request from the IA

**8. Do you agree with the revised requirements for the Reliability Authority?**

- Yes  
 No  
 Neutral

Comments:

**The last version of the SAR listed the TSP as having requirements, but did not clearly identify those requirements. The following TSP requirements were added to the revised Detailed Description.**

- The TSP shall be capable of receiving from and confirming Interchange Transaction information with the IA
- The TSP shall approve or deny the request from the IA

**9. Do you agree with these new requirements for the TSP?**

- Yes  
 No  
 Neutral

Comments:

**The last version of the SAR listed the PSE as having requirements, but did not clearly identify those requirements. The following PSE requirements were added to the revised Detailed Description.**

- The PSE shall request approval for interchange transactions from the IA
- The PSE shall communicate parked transactions to the IA
- The PSE shall confirm interchange transaction requirements with the IA

**10. Do you agree with these new requirements for the PSE?**

- Yes  
 No  
 Neutral

Comments:

**11. Do you agree with the SAR DT that this SAR is ready to be developed into a Standard?**

- Yes
- No
- Neutral

If no, then what do you think needs to be added/deleted to more clearly identify the scope of what should be contained within the standard?

**SAR: Coordinate Operations**

Title of Proposed Standard:	Coordinate Operations
Request Date:	March 7, 2002
Authorized for Posting:	March 20, 2002
SAR ID# :	COORD_OPERATONS_01_02

SAR Requestor Information		SAR Type (Put an 'x' in front of one of these selections)	
Name:	Jim Byrd (Roger Harszy as substitute)	X	New Standard
Primary Contact	Roger Harszy		Revision to existing Standard
Telephone:	317-249-5400		Withdrawal of existing Standard
e-mail:	Rharszy@midwestiso.org		Emergency Action

***Purpose/Industry Need***

To ensure that the operations of each Reliability Authority function (RA) are coordinated such that they will not have an adverse impact on the reliability of other RAs and to preserve the reliability benefits of interconnected operations.

***Brief Description***

Establish requirements for the coordinated operation between RA's for operational (near-term) planning, real-time operations, and maintenance of the interconnected bulk electric system.

This standard will address the following areas:

- Documenting the RAs authority to assist in resolving problems that it is caused to another system
- Developing and Sharing Unique Operating Procedures
- Analyzing Maintenance Outages
- Performing Security Analyses
- Performing Generation Resource Availability Analyses
- Sharing Results of Analyses
- Communicating with Others
- Acting with Others

**Detailed Description**

Requirements shall be developed for the following:

- Document Authority
  - When one RA’s system has a potential or actual adverse impact<sup>1</sup> on another RA’s system, the RA that caused the problem shall have the authority to take actions (within its own RA Area) to mitigate the problem.
- Develop and Share Unique Operating Procedures
  - Unique operating procedures that address identified potential operating scenarios that may impact neighbor RAs or the Interconnection shall be developed, and distributed to all involved parties.
- Analyze Maintenance Outages
  - Analyze the impact of generation outages from a reliability perspective
  - Analyze the impact of transmission outages from a reliability perspective
- Perform Security Analyses
  - The RA shall ensure that reliability analyses (including but not limited to a day-ahead analysis) are performed for all Transmission Operators (TOPs) in its Reliability Area and that such analysis is coordinated with similar analysis performed by neighboring RAs. The purpose of these analyses is to look at the impact of one RA’s system on other systems and to assure that the interconnected bulk power system can be operated in both anticipated normal and contingency conditions.
- Perform Generation Resource Availability Analyses
  - Each RA shall analyze generation resource availability for its impact
- Share Results of Analyses
  - The RA shall share the results of its system analyses, when conditions<sup>2</sup> warrant, or upon request, with other RAs, and other involved entities within its Interconnection.
- Communicate with Others
  - The RA shall notify other impacted RAs under the following circumstances:
    - If a generator or transmission outage will impact another RA within the same Interconnection
    - If outages of information technology (IT) systems (telemetry, communications, and/or control equipment or other information systems) impact the ability of one RA to receive/send data or voice communications
    - If the results of analyses or real-time conditions indicate potential or actual reliability problems
    - If the actual interconnection frequency is outside the defined interconnection frequency limits
    - If the backup control center of the RA must be activated due to loss of the primary control center
- Act with Others
  - Communicate with other RAs to identify and implement a solution to prevent/resolve

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<sup>1</sup> The impacts in this SAR are those that if left unattended could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the interconnected bulk transmission system

<sup>2</sup> The conditions referenced are those that if left unattended could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the interconnected bulk transmission system.

**SAR: Coordinate Operations**

<p>actual/impending operating problems such as:</p> <ul style="list-style-type: none"> <li>- Reliability problems that can't be resolved through existing procedures</li> <li>- Interconnection frequency outside the defined interconnection frequency limits</li> <li>- Prioritization of transmission outages</li> <li>- Prioritization of IT outages</li> <li>- Implement Interconnection-wide transmission reliability preservation procedures in conjunction with all RAs in that Interconnection</li> </ul>
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**Reliability Functions**

The Standard will Apply to the Following Functions ( <i>Put an 'X' in front of each one that applies</i> )		
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
	Planning Authority	Plans the bulk electric system
	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
	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

**Reliability and Market Interface Principles**

Applicable Reliability Principles ( <i>Put an 'x' in front of all that apply</i> )	
X	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions.
X	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
X	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented
X	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
<p><b>Does the proposed Standard comply with all of the following Market Interface Principles?</b></p> <p>(Enter 'yes' or 'no')</p> <p style="text-align: right;">Yes</p>	
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	

**Related SARs**

SAR ID	Explanation
COOR INTERCHNG_01_01	The “Coordinate Interchange” SAR addresses the coordination of data exchange associated with transactions and may have some requirements that interface with the “Coordinate Operations” SAR.
FACILITY_RATINGS_01_01	The “Determine Facility Ratings, Operating Limits, and Transfer Capabilities” SAR identifies how operating limits are established. The operating limits established within this proposed standard will interface with the performance standards within the “Coordinate Operations” SAR.
OPER_WITHN_LMTS_01_01	The “Monitor and Assess Short Term Reliability, Operate Within Limits” SAR identifies requirements for operating within limits in real time and may interface with some of the requirements for the “Coordinate Operations” SAR.
ABNML_&_EM_COND_01_01	The “Prepare for and Respond to Abnormal or Emergency Conditions” SAR identifies requirements for recognizing and responding to emergency conditions and may interface with some of the coordination requirements for the “Coordinate Operations” SAR.
BLACK_ISLD_COND_01_01	The “Prepare for and Respond to Blackout or Island Conditions” SAR identifies requirements for recognizing and responding to blackout or island conditions and may interface with some of the coordination requirements for the “Coordinate Operations” SAR.
BAL_RES_&_DEMND_01_03	The “Balance Resources and Demand” SAR identifies requirements for operating within a defined interconnection frequency limits and may interface with some of the requirements for the “Coordinate Operations” SAR.
DISTURBNCE_COND_01_01	The “Monitor and Analyze Disturbances, Events and Conditions” SAR identifies requirements for monitoring, reporting and analyzing disturbances, events, and conditions and some of the requirements may interface with some of the requirements for “Coordinate Operations” SAR.

**Regional/Interconnection Differences**

Region	Explanation
ECAR	
ERCOT	
FRCC	
MAAC	
MAIN	
MAPP	
NPCC	
SERC	
SPP	
WECC	

**Implementation Plan (Preliminary)**

<b>Description</b>
The following sections of Operating Policies should be retired when this standard is implemented: Policy 4. C (all elements) Policy 9: A (all elements) Policy 9.B.1 Policy 9.B.4 Policy 9.C.2 Appendix 9.D. B.1.5 Appendix 9.D.B.1.6 Appendix 9.D.B.1.7

**SAR Drafting Team Assignments**

<p><b>Chairman:</b></p> <ul style="list-style-type: none"><li>– David McNeill, Entergy</li></ul> <p><b>Secretary:</b></p> <ul style="list-style-type: none"><li>– Larry Kezele, NERC Staff</li></ul> <p><b>Requestor:</b></p> <ul style="list-style-type: none"><li>– Jim Byrd (Roger Harszy, Midwest ISO, Substitute Requestor)</li></ul> <p><b>Compliance Representative:</b></p> <ul style="list-style-type: none"><li>– Stan Kopman, NPCC</li></ul> <p><b>Industry Representatives:</b></p> <ul style="list-style-type: none"><li>– Daniel Boezio, AEP</li><li>– Don Gold, BPA</li><li>– Tony Jankowski, WE-Energies</li><li>– Joseph Krupar, FMPA</li><li>– Ross Owen, Oncor</li><li>– Jerry Ray, Illinois Power</li><li>– Gary Rudder, TVA</li><li>– Greg Tilitson, CAISO</li></ul>
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# Standard Authorization Request Form

Title of Proposed Standard	Reliability Standards Process Manual (RSPM) Revisions
Request Date	3-18-2002 (original), 1-3-2003 (revised at the request of the SAC)

## SAR Requestor Information

Name	Michael P. Green	<b>SAR Type</b> (Check box for one of these selections.)
Company	Chelan Co. PUD	<input type="checkbox"/> New Standard
Telephone	509-264-1105	<input type="checkbox"/> Revision to Existing Standard
Fax	(509) 665-7863	<input type="checkbox"/> Withdrawal of Existing Standard <sup>1</sup>
E-mail	mike@chelanpud.org	<input type="checkbox"/> Emergency Action

## Purpose/Industry Need (Provide one or two sentences.)

The RSPM, hence revisions to it, defines the characteristics of a NERC Reliability Standard and establishes the process for development of consensus for approval, revision, reaffirmation, or withdrawal of such standards. NERC Reliability Standards apply to the reliable planning and operation of the bulk electric systems of North America.

Revisions to the RSPM are needed as described in the description element below. But equally important, the industry must be offered the opportunity to review and comment on the NERC Standards development process and the manual that describes it so that all affected parties will be satisfied that NERC's RSPM procedures are the result of thorough, fair, open and inclusive processes.

**Brief Description**

*Specific requested changes to the manual are listed in the attachment to this SAR. In addition to the listed changes, this SAR will also allow interested parties to submit further requested changes via the comment process. Comments with industry consensus will be sent to an industry ballot pool for approval. It is especially timely that experience gained via currently active NERC standards processes can be also be incorporated in the necessary changes to the manual.*

***This SAR will not suggest changes to the fundamental relationships, responsibilities, roles and structure of the key groups involved in the standards development program***

***<sup>1</sup> Requests to withdraw an existing Reliability Standard only require that this page be completed.***

**Reliability Functions – N/A**

<b>The Standard will Apply to the Following Functions</b> <i>(Check box for each one that applies.)</i>		
<input type="checkbox"/>	Reliability Authority	Ensures the reliability of the bulk transmission system within its Reliability Authority area. This is the highest reliability authority.
<input type="checkbox"/>	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
<input type="checkbox"/>	Interchange Authority	Authorizes valid and balanced Interchange Schedules
<input type="checkbox"/>	Planning Authority	Plans the bulk electric system
<input type="checkbox"/>	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
<input type="checkbox"/>	Transmission Owner	Owens transmission facilities
<input type="checkbox"/>	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders
<input type="checkbox"/>	Distribution Provider	Provides and operates the “wires” between the transmission system and the customer
<input type="checkbox"/>	Generator	Owens and operates generation unit(s) or runs a market for generation products that performs the functions of supplying energy and Interconnected Operations Services
<input type="checkbox"/>	Purchasing-Selling Entity	The function of purchasing or selling energy, capacity and all necessary Interconnected Operations Services as required
<input type="checkbox"/>	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user

**Reliability and Market Interface Principles**

<b>Applicable Reliability Principles</b> <i>(Check box for all that apply.)</i>	
<input type="checkbox"/>	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk electric systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
<b>Does the proposed Standard comply with all of the following Market Interface Principles?</b> <i>(Select 'yes' or 'no' from the drop-down box.)</i>	
1. The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. N/A	
2. An Organization Standard shall not give any market participant an unfair competitive advantage. N/A	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure. N/A	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. N/A	
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. N/A	

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**Detailed Description**

The Requestor has identified the need to make the specific changes to the NERC standards process manual as listed in the attachment to this SAR. In addition to these changes, other changes may be identified during the comment period by industry participants.

Recommended Technical Team: A new work group is recommended to provide for the requirements of this SAR activity. This work group should consist of approximately five representatives, selected randomly from each standing committee, and the Chair and Vice Chair from each standing committee

**Related NERC Planning Standards/Operating Policies**

Standard No.	Explanation
ALL	Existing Reliability Standards Process Manual and any new NERC standard and any revision of any existing NERC standard

**Related SARs**

SAR ID	Explanation
None	No known related SARs

**Regional Differences**

Region	Explanation
ECAR	
ERCOT	
FRCC	
MAAC	
MAIN	

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MAPP	
NPCC	
SERC	
SPP	
WECC	

***Implementation Plan***

<p><b>Description</b> <i>(Provide plans for the implementation of the proposed standard, including any known systems or training requirements.)</i></p>
<p>The implementation plan can not be developed without further assessment of the revisions to the RSPM.</p>
<p><b>Proposed Implementation:</b> <i>(To be developed)</i></p>

<b>SAR Drafting Team</b>	
<b>Chairman</b>	
<b>Secretary</b>	
<b>Requestor</b>	
<b>Industry Representatives</b>	

Proposed Changes to Reliability Standards Process Manual

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Attachment to Michael P. Green's SAR of 1-3-2003

<b>Terminology</b>			
<b>Change #</b>	<b>Original Terminology</b>	<b>Proposed Terminology</b>	<b>Reason for Change</b>
T1	Field Use Testing	Trial Use Testing	ANSI terminology
T2	Will	Shall	Clarify need to comply
T3	Comments	Views and Objections	ANSI terminology
T4	Action to develop a new or modified standard or to withdraw an existing standard	Standards Action	Saves space and redundancy in text
T4	Standards undergoing their 5 year review	Reaffirm	ANSI terminology
T5		Definition of Consensus	ANSI practice
T6		Definition of Substantive Change	ANSI practice
T7	Standard Reference Procedure Training Reference Technical Reference	Reference Documents	Simplify variety of documents
T8	Standard Supplement	Forms	Simplify

<b>Miscellaneous Deletions</b>		
<b>Change #</b>	<b>Recommended Change</b>	<b>Reason for Change</b>
D1	Overview of Consensus Development Process – delete bullets after Due Process, Openness and Balance	Bullets don't provide any new information – they provide an overview of some but not all of the steps in the process
D2	Numbering System – delete description	This will be a subset of the Standards Information System and doesn't need to be addressed here

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D3	<p>Except for the Appeals section, delete all text from all other sections describing the appeals processes and replace with text providing only reference to the Appeals section. Suggested referral text is the following:</p> <p style="text-align: center;">“Appeals by requestors, SAR Drafting Teams, Standard Drafting Teams, and commenters are governed by section X of this manual”</p> <p>Where “X” is the correct reference to the Appeals provisions in the RSPM.</p>	<p>The current manual has conflicts between the provisions and rights described in the Appeals section and processes and rights described in other sections of the manual.</p> <p>The appeals provisions can be managed better if they are exclusively provided in a single section of the manual</p>
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***Participants in the Process***

Change #	Proposed Change	Reason for Proposed Change
P1	BOT - Add BOT responsibility for assuring compliance with the integrity of the process and for ensuring that standards are filed with appropriate authorities.	
P2	SAC – indicate Director of Standards is the secretary	Conforming change to meet BOT requests
P3	NERC and Regional Reliability Council Members	Delete – Conforming change to meet BOT requests (Regional Councils become part of an Industry Segment)
P4	Compliance Enforcement Program - change to Compliance Enforcement Staff and their liaisons – revise to indicate a rep will be assigned to the SAR Advisory Team and each Drafting Team and include a statement of their purpose on these teams – modify the tone of this paragraph to have the compliance rep seem more like a team member helping the group achieve a goal of measurable, objective standards	Original language was misleading – the NERC compliance enforcement staff is quite small – most participants are trained industry liaisons
P5	SAR Drafting Team -- Leadership, the authority to which it reports, mission, and role need clarity. Expansion and definition of the phrase, “consensus on the SAR”, is needed. In giving clarity to the SAR Drafting team, consider the degree to which its mission is to draft the SAR and the degree to which its mission is to provide information to the SAC for facilitating the SAC’s determinations in authorizing a SAR to proceed with standard drafting?	SAR Drafting Team’s mission and leadership are not clear.

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	<p>Explicitly describe the roles of the Requestor and SPM</p> <p>As required, make conforming changes to the balance of the manual.</p>	
P6	<p>Standard Drafting Team -- Leadership of the team and the authority to which it serves need clarity. In giving clarity to the Standard Drafting team, explicitly describe the roles of the Requestor and SPM.</p> <p>As required, make conforming changes to the balance of the manual.</p>	<p>SAR Drafting Team's leadership, roles for Requestor and SPM, authority it serves are not clear.</p>
P7	<p>NAESB interface team (the "Joint Interface Committee")</p>	<p>Individuals with interface responsibility need to be defined in accordance with the applicable NERC/NAESB agreement(s)</p>

<b>Steps in the Process</b>		
<b>Change #</b>	<b>Proposed Change</b>	<b>Reason for Proposed Change</b>
S1	<p>Step 1 - Identify what information is required on an initial SAR submission.</p>	<p>Clarify requirements – enable people who have an idea for a standard to propose the standard without adding all the technical details</p>
S2	<p>Step –1 Timelines for SAC actions and considerations.</p> <ul style="list-style-type: none"> <li>• With respect to an initiated SAR, current provisions require SAC action within 60 days. Replace this provision with a requirement for SAC action within 15 working days.</li> <li>• With respect to an action rejecting a SAR, the current provisions allow the SAC 30 days to provide the Requestor with an explanation of the SACs' decision (to reject). Replace this provision with a requirement for the SAC to provide this written explanation to the Requestor within 5 working days.</li> </ul>	<p>Current provisions lead to excessive delay without real purpose. Utilization of guidelines as provided below will facilitate SAC actions via email and telephone conferencing and the noticing of its actions as may be required.</p> <p>The current timeline for providing a written explanation of a rejection would fully exhaust the time within which the Requestor may appeal the action of the SAC (also 30 days)</p>

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S3	<p>Step1 – Provide a minimum set of guidelines and principles as check-lists to guide SAC actions with respect to:</p> <ul style="list-style-type: none"> <li>• The required qualifications of a requestor of a SAR</li> <li>• Determining a SAR is acceptable for entry into the process</li> <li>• Rejecting a SAR</li> <li>• Remanding a SAR</li> <li>• Guidelines must also describe actions/activities that are not appropriate for the SAC to ensure that the SAC focuses on managing the process and does not attempt to interfere with the technical content of SARs. It is the industry’s job to determine the appropriateness of the technical content.</li> </ul>	<p>Guidelines and principles (check lists) are needed to assist the SAC in avoiding arbitrary actions and decisions, protect the rights of requesters, and properly expedite the process</p>
S4	<p>Step 1 – Provide a listing of instructions and details required of the SAC with respect to any determination to remand a SAR.</p> <ul style="list-style-type: none"> <li>• Anticipated next SAC consideration of the SAR.</li> <li>• Specific instructions to the SPM and Requestor which if accomplished will lead to acceptance of the SAR by the SAC.</li> <li>• Timeline limitations – Prescribe that the Requestor must offer a remanded SAR for consideration (as specified above) or request an extension for consideration at another time. Failure by the Requestor to do this will be grounds for a rejection of the SAR by the SAC.</li> <li>• Requirement to examine the progress of the SAR at subsequent SAC meetings as long as it remains in an active remand status.</li> <li>• Direct written notice to the Requester of</li> </ul>	<p>Provisions will protect rights of requesters and preclude arbitrary actions by SAC. “Remand” is now open ended. Process delays may be too convenient.</p> <p>Lack of timely Requestor action can also lead to delays and a backlog of remanded SARs. Such a backlog can be an excessive overhead for the SAC and SPM.</p> <p>Promotes better management of the processes.</p>

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	<p>the remand action within 5 working days. This notice shall include all of the items prescribed immediately above and the SACs determinations with respect to the guidelines for remanding a SAR.</p>	<p>Current provisions do not provide for any requirement to notice the Requestor.</p>
S5	<p>Step 1 -- Delete current text respecting “Appeal” and replace with reference to Appeals section (NOTE discussion above and in the deletions table of these proposed changes).</p>	<p>The implication given by the section is that an appeal may only be filed for a reject action. The appeals section provides much broader appeal provisions</p>
S6	<p>Step 1 – Require any notice of SAC action affecting a Requestor, including explanations of remand and rejection actions, to be expeditiously provided to the requester.</p>	<p>The appeals process allows appeals within 30 days of a SAC action or procedure. Notice of action should allow reasonable time for requester appeals. As literally written, a requester might receive an explanation at the same time his right to appeal expires</p>
S7	<p>Step 1 – Clarify the statement about the “posted status” of submitted SARs, their access for review, and the degree to which this review is public or otherwise.</p> <p>This statement must be conforming with other statements in the manual relating to posted status of a SAR (Note Step 2 posting item below).</p>	<p>Clarity</p>
S8	<p>Step 2 - Add language to specify that SARs are posted on the first and fifteenth calendar-days of each month.</p>	<p>Clarify expectations</p>
S9	<p>Step 2 – As an alternative to the immediately above, add language to specify that SARs and changes in SAR status are to be posted within 5 working days of the applicable SAC action.</p>	<p>Clarify expectations --- Given the intent to conduct these processes electronically, this should not be difficult. Given our electronic environment, added delay has no purpose.</p>
S10	<p>All Steps – Require electronic noticing to of each SAR and SAR status posting to the Registered Ballot body</p>	<p>The electronic technology available today must be used to alert the industry of pending standards actions as quickly as possible.</p>
S11	<p>Step 2 - Add the provision of industry forums, if needed, to air differing views during consensus</p>	<p>Provide more opportunities for open communication within the process to</p>

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	building for SARs. .	better achieve industry consensus
S12	Re item immediately above, suggest adding the following, “This language needs to be consistent with BOT determinations (expected by June of 2003) with respect to the roles of the standing committees”	
S13	Step 2 – replace “appointed team” with the name of the team applicable for this step.	Discussion clarity
S14	Step 2 – Prescribe that “after the SAR Drafting Team has been assigned”, prompt consideration will be given.	Requestor would not otherwise have the resources to comply.
S15	<p>Step 2 – Add the following provisions:</p> <ul style="list-style-type: none"> <li>• Requestor, via the SPM, or the SPM acting alone may request SAC approval for additional postings for public comment. Clarify that SAC approval is required for such an additional posting for comment.</li> <li>• SAC shall consider such a request as identical to a Step 1 request and comply with Step 1 procedures</li> <li>• Upon due notice to the requestor and the community, the SAC may consider any SAR for a Step 1 action and in doing so shall comply with Step 1 procedures. With this process, the SAC may with a “remand” interrupt and improve a process with a given SAR.</li> </ul>	Process improvement
S16	<p>Step 2, 3, and 4 –Establish clear language to be used in describing what is being posted and what is being requested with respect to SARs. Establish clear language to describe the status of a SAR and its associated standard development. This clear language will be used throughout the manual</p> <p>Consider a name differentiation between a SAR initiated by a requester, a SAR accepted by the SAC as a candidate for development into a standard, and an “authorized SAR”</p>	<p>The manual presently has a mix of language using “accepted” and “authorized”. More clarity is needed. Is the “accepted” in step three the same as the “authorized” in step 2. The step 2 and 3 “authorization” should point to Step 4. Most SAR posting described in the manual is really the posting of status changes to SARs</p> <p>The proposal is for improved language for purposes of clarity.</p>

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S17	Steps 2 and 3 --These steps begin with language that is nearly identical. Are they at identical beginning points? If yes, use the same language or alternatively merge applicable provisions. If no, provide better clarity.	Clarity
S18	Move the solicitation provisions for Standard Drafting team nominations to Step 4 or Step 5.	<p>Nominations prior to SAC’s authorization for standard development may prove to be unnecessary and inefficient. Interest and commitment may not be ready. Individuals may drop out of premature nominations.</p> <p>In the currently described process, it may be literally months from these nominations to the time standard drafting is authorized.</p> <p>Nominations should occur when circumstances are ripe for nominations. As currently prescribed, the current manual is confusing. The discussion is in Step 3 but, it states “For each new SAR . . . “ the SAC will seek self nominations for the standard drafting.</p>
S19	<p>Step 4 –Provide a minimum criteria set for a SAC determinations. This should mirror those guidelines, etc., provided for Step 1. In the case of authorizing the development of a standard, the SAC must determine a need for the proposed standard.</p> <p>A requester (and SAR drafting team?) request for authorization should specifically address the criteria. SPM should assist in the proposal</p>	<p>See reasoning provided in S1</p> <p>Note that in step 6 the statement is made that the “need for the standard was established by authorization of the SAC”. However, this “need” is not mentioned in this Step 4</p> <p>Facilitate SPM work and SAC determinations</p> <p>Conflict</p>

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S20	Step 4 – Add “remand” as an action that may be taken by the SAC. Add applicable guidelines and criteria for such an action	Process improvement
S21	<p>Step 5 -- Delete the last two sentences. Add language to the effect that</p> <ul style="list-style-type: none"> <li>• the SPM will work with the Standard Drafting Team to ensure a drafted standard is within the scope and purpose identified in the SAR</li> <li>• the drafting team may request SAC for approval for posting for comment</li> <li>• SPM must conduct the applicable review and prepare a recommendation for SAC action</li> <li>• Subject to ample notice provisions, the SAC shall consider the request for posting for public comment.</li> <li>• SAC actions, procedures, and guidelines for such a request substantially equivalent to those of Step 1 and Step 4</li> </ul>	<p>“should occur with a 30-day period” has no substantive meaning.</p> <p>The SAC must be the body that determines appropriate process actions in all cases. The suggested changes facilitate SAC management of the process.</p> <p>Quality of processes</p>
S22	Step 5 – The participants section of this document specifies further definition of the Standard Drafting Team. Changes to conform with the leadership and reporting authority of the drafting team and the roles of the SPM and Requestor in the standard development will be required in Step 5.	Conformity and clarity of manual.
S23	All Steps – Prescribe the role of the Requestor.	Clarity
S24	Step 5 – This step prescribes that the SAC, after its authorization to develop a standard, will assign the drafting of the standard to a Standard Drafting Team. The manual does not prescribe a time constraint for this assignment. Establish a time constraint.	<p>Open ended process</p> <p>Improved clarity in process is needed</p>
S25	<p>Step 5 – Prescribe that the SPM with the assistance of the standard drafting team shall</p> <ul style="list-style-type: none"> <li>• expeditiously draft a work plan for the applicable standard</li> <li>• regularly update plan for reporting to the</li> </ul>	<p>Quality of process</p> <p>Promotes progress in the effort</p>

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	<p>SAC</p> <ul style="list-style-type: none"> <li>at each meeting of the SAC, brief the SAC on the status of each SAR and each standard in development</li> </ul>	Provides for management by the SAC
S26	All Applicable Steps – Add conforming provisions as required to effectuate the purposes of the provision immediately above.	Same as immediately above
S27	<p>Step 6 – Replace the first sentence with something to the effect that the draft standard will be posted as soon as practicable and not later than five working days after the posting is authorized by the SAC. Also provide that the Registered Ballot Body will be electronically noticed.</p> <p>Prescribe that the notice will solicit comments in specific and other areas as may be defined by the SPM and or the Drafting team.</p>	<p>Prescribed timeline is ambiguous. Delay serves no purpose</p> <p>Expedites the process, promotes clarity</p>
S28	<p>Step 6 – Add provisions that</p> <ul style="list-style-type: none"> <li>the Drafting Team, SPM, Requestor, or any affected party may request the SAC to authorize an industry forum to air differing views during consensus building for a standard under development.</li> <li>With due notice the SAC may direct the SPM to offer such a proposal for a forum</li> <li>The SAC may request an applicable NERC committee to provide such a forum. NOTE this provision needs to be consistent with BOT determinations (expected by June of 2003) with respect to the roles of the standing committees”</li> <li>The actions the SAC may take and its guidelines and procedures are substantially equivalent to those for Step 1 and Step 4</li> </ul>	<p>Process improvement</p> <p>Improved opportunity for consensus.</p>
S29	Step 8 – Is role for Requester appropriate at this point (step prescribes “distribute those comments to the Standard Drafting Team and the Requester”. If yes, examine role for Requester in Steps 5 and 6	<p>Steps 3 through 6 are largely silent on the role of the Requestor.</p> <p>Consistency needed</p>

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	Examine if Requester should be involved in the decisions prescribed for the drafting team.	Refer to the Participants section of this document for additional recommendations relating to the SAR drafting and standard drafting teams.
S30	Step 8 – Consider if “shall” is overused. Where “shall” is used, specific time criteria should be established for such requirements. The use of “shall” in this step is not language which is consistent with the balance of the manual	Consistency/Quality / Open ended
S31	All Steps – Incorporate conforming provision necessary respecting re-write of the Regional Differences section (see special procedures table below)	Consistency
S32	<p>Step 9 – Add the provisions that with respect to a proposed standard and prior to its first ballot:</p> <ul style="list-style-type: none"> <li>• The SAC shall direct the SPM to offer a recommendation with respect to the need for an open forum to discuss the technical and commercial aspects of that standard</li> <li>• SAC must consider the need for such an open forum and in doing so must consider the recommendations of the SPM and other input</li> <li>• After such consideration the SAC may determine that such a forum will be conducted prior to balloting for the standard</li> <li>• After due notice The SAC may request an applicable NERC committee to provide such a forum.</li> </ul> <p>NOTE this provision needs to be consistent with BOT determinations (expected by June of 2003) with respect to the roles of the standing committees”</p>	

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<b>Special Procedures</b>		
<b>Change #</b>	<b>Proposed Change</b>	<b>Reason for Proposed Change</b>
SP1	Urgent Action s- Expand the termination date of Urgent Actions from one year to eighteen months for a temporary period of two years from the adoption of this change.	It is unlikely that a standard can be developed and approved within 12 months – 18 months is more reasonable deadline
SP2	Urgent Action – The requestor of an Urgent Action must also simultaneously submit a SAR to initiate the long term fix to the issue requiring urgent action to the SAC before an Urgent Action can be approved. Once the Urgent Action is approved, work on this SAR must begin immediately.	Expedites process for a supplanting standard (of urgent action)
SP3	Urgent Actions – Prescribe guidelines, procedures, and actions for the SAC, which are consistent with those of Step 1 and Step 4. Additionally, the SAC must have a finding of fact that an urgent action is needed for specific reasons.	Guidelines and principles (check lists) are needed to assist the SAC in avoiding arbitrary actions and decisions, protect the rights of requesters, and properly expedite the process
SP4	Urgent Action s- add text that specifies that there is only one ballot conducted – there is no readiness ballot	Improved clarity of manual

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<p>SP5</p>	<p>Revisions - Add the ability to revise an existing standard with a SAR without opening up the approved standard to review as long as the change didn't change the scope of the associated standard. When authorizing this, the SAC should give consideration to the 5-year review, and if the proposed change is to a standard that will need to be reaffirmed within 12 months, the standard should be reaffirmed coincident with the proposed revision</p>	<p>It takes 12-18 months to develop a new standard – there are likely to be requests for changes that involve just a single measure within a standard – this would enable the industry to focus on the specific change without reviewing the entire standard</p>
<p>SP6</p>	<p>Withdrawals – Add details to the process to identify which steps are eliminated if the industry agrees the standard should be withdrawn</p>	<p>Improved clarity of manual</p>
<p>SP7</p>	<p>Regional Differences – Substantially re-write all related provisions to add specificity and clarity (this SAR will not consider changes to the intent and purposes of this section). Resolve conflicting provisions. Establish requirement for Drafting Team to incorporate Interconnection-wide differences. Prescribe:</p> <ul style="list-style-type: none"> <li>• Clearly and detail how such a standard is proposed.</li> <li>• Establish who has standing to offer such a proposal, which “shall” be incorporated by the Drafting team.</li> <li>• Establish a proper voting for a standard with regional differences (consider, does everyone vote or is the vote on the “regional” standard only by certain voters.?)</li> </ul> <p>Eliminate the use of the word “should”. As it is used, “should” provides no substantive requirement</p>	<p>Improved clarity of manual</p> <p>Establish workable provisions.</p>
<p>SP8</p>	<p>Appeals – Substantially re-write this section to improve specificity and clarity. Improve consistency in tone and tense of this section with the balance of the manual. Fully describe the Appeals processes and rights in this section. With respect to appeals, all other sections will not have language that goes beyond referring to the appeals section.</p>	<p>General improvement, consistency and balance in the manual</p>

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	<p>Time lines in the process must be consistent with related processes (SAC meetings, etc.)</p> <p>45 days for the SPM to respond to a complaint is too long! 10 working days is more reasonable. With proper notice, a Requester will then be able to respond to the SPM's written response to his complain in time for consideration at the next SAC meeting.</p> <p>Add provision where requestor may obtain reconsideration with the SAC with a response to the SPMs written response to his complaint.</p> <p>Prescribe substantive effects of "finding in favor of the Requester" together with the applicable time requirements (e.g. What shall the SAC do and by when). Alternatively, prescribe standards to guide instructions, findings, and time constraints related an appeals determination.</p> <p>The final appeal opportunity (to the BOT) is limited is offered only when the BOT will be considering to adopt a standard and it is limited to procedural objections by an entity. The reference to "entity" is inconsistent with the balance of the Appeals section.</p> <p>The final appeal opportunity must be available with respect to a procedural complaint respecting any SAC action.</p>	
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<b>Maintenance of Reliability Standards and Process</b>		
<b>Change #</b>	<b>Proposed Change</b>	<b>Reason for Proposed Change</b>
M1	<p><b>Process Revisions – Add provisions to enable administrative changes to the manual.</b>  <b>Provisions to include:</b></p> <ul style="list-style-type: none"> <li>• <b>The BOT may request SAC recommendations with respect to changes in certain administrative changes of the RSPM</b></li> <li>• <b>The SAC shall have the authority to request BOT consideration of certain administrative changes to the RSPM.</b></li> <li>• <b>After opportunity for SAC recommendations with respect to certain administrative changes to the RSPM and in consideration of such provided recommendations and any other input the BOT shall have the authority to make administrative changes to the RSPM, provided these changes do not materially affect the rights of any of the parties associated with the standards development process.</b></li> </ul>	

<b>Format Changes</b>		
<b>Change #</b>	<b>Proposed Change</b>	<b>Reason for Proposed Change</b>
F1	Correct the overview flowchart	
F2	Add simple flowcharts to steps in the process – especially the balloting steps	
F3	Eliminate as much passive language as possible and identify who is responsible for completing each task in the process.	

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F4	Include the name of a step in addition to the step number (e.g., Repeat Step 6 (Post SAR))	
F5	Add section, paragraph and sub-paragraph numbering format	Give the manual the look, feel and usability of a NERC policy.

The SAR (STNDS\_PRCs\_MN02\_01\_01) is posted on the Standards web site at:  
<http://www.nerc.com/~filez/sar-approved.html>

E-mail this form between January 31–March 3, 2003, to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.

**Please review the SAR and answer the questions in the yellow boxes.**

If you have questions, please call Tim Gallagher at 609-452-8060 or send a question to [timg@nerc.com](mailto:timg@nerc.com).

<b>SAR Commenter Information</b>	
Name	
Organization	
Telephone	
E-mail	
<b>Which Industry Segment do you represent?</b>	
<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Gvt. Entities
<input type="checkbox"/> Generators	

**1. Please identify any specific modifications to the NERC Reliability Standards Process Manual that you disagree with (if any) and your reason for disagreeing.**

Comments:

**2. Please list any additional modifications to the NERC Reliability Standards Process Manual that you wish to add and the reason for adding them.**

Comments:

**3. Please provide any other comments you wish to make.**

Comments: