

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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This form is to be used to submit comments on the proposed *Provide Missing Measures and Compliance Elements in Existing Standards* Standard Authorization Request. Comments must be submitted by **June 8, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “V0 Compliance Elements: SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Alan Adamson	
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NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities	
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities	
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators	
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers	
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users	
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users	
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities	
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



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### Background Information:

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

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**Question 1: Do you agree there is a reliability need to address missing and deficient elements in the Version 0 Reliability Standards?**

Yes

No

**Please provide any additional comments:**

The New York State Reliability Council (NYSRC) agrees with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.

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**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

The NYSRC agrees with the scope of the SAR; however, the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards.

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**Question 3: Do you believe there are additional standards that require compliance or measurement information that were not included in the scope of this SAR?**

Yes

No

**Please provide any explanation below:**

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**Question 4: Do you agree with proposed work schedule prioritizing the standards identified in the SAR?**

Yes

No

**Please provide any explanation or suggested modifications below:**

1. The SAR should provide the basis for its recommended schedule.
2. The SAR states that the Version 0 SDT recommended that the modifications be developed on a high priority basis. It appears to us that taking up to four years to make these changes, as proposed in the SAR, can hardly be considered high priority implementation. If NERC still considers this project to be of high priority, perhaps it should evaluate the priority of all other proposed standards together with those recommended in this SAR, for the purpose of developing a comprehensive implementation schedule for ALL standards.
3. We specifically recommend that the schedule for modifying EOP-006-0, which is scheduled in the SAR to be modified in 2007, be advanced because of the important need of this system restoration standard.
4. We recommend that the COM-002-0 Standard should be moved up in priority. These COM standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.

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**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

See our comment to the title of the SAR in Question 2.

We also believe that, although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.

In addition, the NYSRC requests the Drafting Team to clarify why standards such as (EOP-002-0, IRO-001-0) with Measure and compliance elements missing were included in this effort while, at the same time, there seems to be an omission of some standards such as (EOP-005-0, BAL-003-0 to BAL-006-0) that are missing those same elements.