

**Comment Form – Proposed Frequency Response Standard**

**COMMENT FORM  
Proposed Frequency Response Standard**

This form is to be used to submit comments on the proposed Frequency Response Standard Authorization Request. Comments must be submitted by **February 17, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Frequency Response 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>		
(Complete this page for comments from one organization or individual.)		
Name:	Theodore Pappas	
Organization:	New York State Reliability Council	
Telephone:	516-545-4011	
Email:	tpappas@service.lipower.org	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	X	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"/>	
<input type="checkbox"/> NA - Not Applicable		



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### **Background Information:**

Posted for comments is the first posting of the Frequency Response SAR. The Frequency Task Force of the NERC Resources Subcommittee has identified the transient frequency response characteristics as degrading over time and potentially threatening the reliability of the bulk electric system. This Standard Authorization Request was initiated to address this concern by developing a standard to specify a measuring convention for frequency response and by specifying a minimum required response to system disturbances based on the convention.

The requestor would like to receive industry comments on this SAR and to obtain the input of the industry prior to determining the final scope and requirements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject "Frequency Response SAR Comments" by February 17, 2005.

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**Question 1: Do you agree there is a reliability need for a specifying the quality and quantity of frequency response?**

Yes

No

**If no, please explain in the space provided below.**

**Comments**

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**Question 2: Do you agree with the scope and applicability of the proposed standard?**

Yes

No

**If no, please explain in the space provided below.**

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**Question 3: Do you believe these standards are more appropriately additions to existing standards as opposed to creating new standards?**

Yes

No

**If yes, please identify the location you believe would be the most appropriate for the proposed standard.**

**Comments**

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**Question 4: 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.**

The Standard should define the term “event” in terms of time and frequency deviation. The frequency deviation the event must fall outside the droop deadband.