

**COMMENT FORM**  
**Draft 1 — Phase III-IV Planning Standards**

This form is to be used to submit comments on Draft 1 of the Phase III-IV planning standards that were not developed in the Version 0 reliability standards project. Comments must be submitted by **June 6, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Phase III-IV Planning Standards” in the subject line. If you have questions please contact Gerry Cauley at [gerry.cauley@nerc.net](mailto:gerry.cauley@nerc.net) or 609-947-3885.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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:	Alan Adamson	
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NERC Region		<b>Registered Ballot Body Segment</b>
<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		



This questionnaire refers to Draft 1 of the proposed Phase III-IV planning standards, which are now posted for review. These proposed standards were originally considered in the development of the Version 0 standards, but were dropped from that effort based on concerns expressed by commenters during the first posting.

The drafting team has focused on translating and preserving the intent of the original planning measures, while making improvements recommended by stakeholders during the previous postings. The drafting team considered prior comments on: a) the four SARs proposing these standards; b) the draft Version 0 standards; and c) the field testing of some of the original planning standards. The drafting team has posted its response to these comments as further explanation of the proposed draft standards. In Question 1 below, the drafting team is soliciting stakeholder comments on the translation and improvements made to these standards.

Some of the Phase III-IV planning measures are not translated in this current draft. The drafting team recommends these measures be dropped because a) the requirements are already addressed in Version 0; b) the requirements are unnecessary for reliability; or c) more research is needed before a consensus standard can be developed. In Question 2, the drafting team requests confirmation by stakeholders that these measures should be dropped at this time.

The drafting team has posted a copy of the proposed new standards mapped side-by-side with the prior planning measure to facilitate comparison by commenters. This copy is probably the most useful copy to work from for review purposes. The “clean” draft of the standards that is posted is identical to the left column of the “mapping” draft, but does not have the notes of the drafting team. The drafting team has posted an index to cross reference the proposed new standards and the old standards.

Please note that in several instances the drafting team has modified an existing Version 0 standard rather than introduce an entirely new standard. This was done where the measure to be translated was closely related to a standard that has already been adopted. Each revision of an existing Version 0 standard is clearly indicated.

**Question 1:** The table below lists the proposed new standards, cross referenced to the original planning measures. Drafting team notes indicate how each measure was translated and where several measures were merged into a single standard. Commenters are requested to indicate a) whether they agree there is a reliability need for each proposed standard and b) whether they agree the drafting team has done an acceptable translation. A field is provided for specific comments and recommended changes. Please note that the drafting team has included some comments and questions within the posted draft standards.

<b>Proposed Standard</b>	<b>Prior Planning Measure(s)</b>	<b>Drafting Team Notes</b>	<b>a) Reliability Need</b>	<b>b) Acceptable Translation</b>	<b>c) Reason for negative response or additional comments.</b>
<p><b>EOP-005-1</b> System Restoration Plans (Revision of Version 0 Standard EOP-005-0)</p>	<p><b>IV.A.M2</b> – Demonstrate through simulation or testing that a blackstart generating unit can perform its function <b>IV.A.M3</b> – Diagram the number, size, and location of system blackstart generating units and the initial transmission switching requirements</p>	<p>Merged IV.A.M2 and IV.A.M3 into existing standard EOP-005-0 as R8, R9 and R10, M1 and M2. Replaced requirement for cranking path diagrams with requirement to document cranking paths.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>IV.A.M2 has not been fully translated into R10 and measure M2.</b></p> <p><b>The Measures should include other restoration plan measures, not only those related to blackstart.</b></p> <p><b>In R9, it is important that serious consideration should be given to blackstart testing more frequently than "at least every five years." The Drafting Team should clarify the term Startup Function in R9 to distinguish between simple blackstart of a unit(s) and the ability to perform restoration service.</b></p> <p><b>We suggest to reformat the restoration plan requirements as separate bulleted subrequirements and then reformat the Blackstart unit testing section into subRequirements for clarity.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>MOD-016-1</b> Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy for Load, and Controllable Demand-Side Management (Revision of Version 0 Standard)</p>	<p><b>II.D.M2</b> – Reporting procedures to ensure against double counting or the omission of customer demand data</p>	<p>Merged with existing MOD-016-0. See R1.2 and M1.</p>	<p><input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree.  <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>R1.5 - The use of the actual and forecast data as directly provided by the LSE must be analyzed to ensure it is properly aggregated to reflect coincident peak demands for system modeling and reliability analyses. It is suggested that the word "incorporate" be used instead of "use" in that Requirement.</b></p> <p><b>Also there is a formatting error in this Standard. M1 as it appears in the Requirements Section needs revision. R1 should be the Section and R2-R8 should be "sub" requirements due to the language at the end of R1.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>MOD-022-1</b> Use of Disturbance Data to Develop and Maintain Models</p>	<p><b>I.F.M5</b> – Use of disturbance data to develop and maintain models</p>	<p>Translation to new standard.</p>	<p><input type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>Suggested change to R1: Specify the type of disturbances which are required to validate models.</b></p> <p><b>Also change:</b></p> <p><b>"..to develop, maintain, and enhance steady-state and dynamic models."</b></p> <p><b>to</b></p> <p><b>"..to enhance analysis of wide area system disturbances and validate system simulation models.</b></p> <p><b>In addition this may be more appropriate to be a Guide rather than a Standard as the inclusion of all system disturbances in the validation of system models seems onerous and unmeasurable.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>MOD-023-1</b> Procedures for Verifying Generation Equipment Data</p>	<p><b>II.B.M1</b> – Regional procedures for generation equipment testing</p>	<p>Translation to new standard.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>R1 requires the RRO to establish procedures that require generator owners to provide certain information. These procedures should include all the requirements included in MOD-024-1 and MOD-025-1 that apply to generator owners, that in some cases are more specific than now shown in MOD-023-1.</b></p> <p><b>R1.2, change:</b></p> <p><b>"Acceptable methods.."</b></p> <p><b>to</b></p> <p><b>"Guidelines for methodology.."</b></p> <p><b>In R1.4.2 we request the drafting team to define "gross and net reactive power capability".</b></p>

<b>Proposed Standard</b>	<b>Prior Planning Measure(s)</b>	<b>Drafting Team Notes</b>	<b>a) Reliability Need</b>	<b>b) Acceptable Translation</b>	<b>c) Reason for negative response or additional comments.</b>
<b>MOD-024-1</b> Verification of Generator Gross and Net Real Capability	<b>II.B.M2 –</b> Verification of gross and net real power dependable capability of generators	Translation to new standard.	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	
<b>MOD-025-1</b> Verification of Reactive Power Capability	<b>II.B.M3 –</b> Verification of gross and net reactive power capability of generators	Translation to new standard.	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<b>MOD-026-1</b> Verification and Modeling of Generator Excitation Systems and Voltage Controls	<b>II.B.M4</b> – Test results of generator voltage regulator controls and limit functions <b>II.B.M6</b> – Verification of excitation system dynamic modeling data	Translation to new standard merging II.B.M4 (R1, R2 and M1) and II.B.M6 (R3, R4, R5, R6 and M2).	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	
<b>MOD-027-1</b> Verification and Status of Generator Frequency Response	<b>II.B.M5</b> – Test results of speed/load governor controls <b>III.C.M9</b> – Speed/load governing system	Translation to new standard merging II.B.M5 (R1 and M1) and III.C.M9 (R2 and M1).	<input checked="" type="checkbox"/> Agree.  <input type="checkbox"/> Do not agree.	<input type="checkbox"/> Agree.  <input checked="" type="checkbox"/> Do not agree.	<b>The drafting team should verify that the testing requirements that appear in the "S" language in the original Standard, has been dropped; was this intentional?</b>

<b>Proposed Standard</b>	<b>Prior Planning Measure(s)</b>	<b>Drafting Team Notes</b>	<b>a) Reliability Need</b>	<b>b) Acceptable Translation</b>	<b>c) Reason for negative response or additional comments.</b>
<p><b>MOD-028-1</b> Provision of Models and Data for Transmission Power Electronic Control Devices</p>	<p><b>III.B.M2</b> – Provision of models and data for control devices for use in system modeling <b>III.B.M3</b> – Periodic review of settings and operating strategies of control devices</p>	<p>Merged III.B.M2 (R1, R3, M1, and M3) and III.B.M3 (R2, R3, M2, and M3).</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>PRC-002-1</b> Define and Document Regional Disturbance Monitoring and Reporting Requirements (Revision of Version 0 Standard)</p>	<p><b>I.F.M3</b> – Disturbance monitoring data reporting requirements</p>	<p>Merged into existing PRC-002-0: See R3, R4, M3, and M4.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>PRC-003-1</b> Regional Procedure for Transmission and Generation Protection System Misoperations. (Revision of Version 0 Standard)</p>	<p><b>III.C.M10</b> – Regional procedure on generator protection operations</p>	<p>Merged into existing PRC-003: See R1, R2, M1, and M2.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>The requirement in R1 should be limited to bulk power transmission.</b></p>
<p><b>PRC-004-1</b> Analysis and Reporting of Transmission and Generation Protection System Misoperations (Revision of Version 0 Standard)</p>	<p><b>III.C.M11</b> – Analysis of misoperations of generator protection equipment</p>	<p>Merged into existing PRC-004: See R1, R2, M1, and M2.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>The requirement in R1 should be limited to bulk power transmission.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>PRC-005-1</b> Transmission and Generation Protection System Maintenance and Testing (Revision of Version 0 Standard)</p>	<p><b>III.C.M12</b> – Maintenance and testing of generator protection systems</p>	<p>Merged into existing PRC-005: See R1, R2, M1, and M2.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>In reference to the applicability and requirements for TOs, there should be reference to voltage classification, or whether this applies to Bulk Power System elements only. In reference to the applicability and requirements for GOs there should be reference to size of generation, or whether this applies to Bulk Power System elements only.</b></p> <p><b>Under Requirements R2, the documentation required should be described or clarified. This clarification should state whether the documentation is a written description in paragraph form, or the copy of the organization's entire relay maintenance file.</b></p>
<p><b>PRC-018-1</b> Disturbance Monitoring Equipment Installation and Data Reporting</p>	<p><b>I.F.M2</b> – Disturbance monitoring equipment list <b>I.F.M4</b> – Disturbance data</p>	<p>Translation to new standard merging I.F.M2 (R1, R2, M1, and M2) and I.F.M4 (R3 and M3). Added time synchronization requirement based on August 2003 blackout recommendation.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>Section C, Measures, M2 references PRC-002 R2.1 through R2.6. It appears that it should be referring to PRC-018-1 instead.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>PRC-019-1</b> Coordination of Generator Voltage Regulator Controls with Unit Capabilities and Protection</p>	<p><b>III.C.M8</b> – Coordination of generator controls with the generator’s short-term capabilities and protective relays</p>	<p>Translation to new standard.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>PRC-020-1</b> Under-Voltage Load Shedding Program Database</p>	<p><b>III.E.M2</b> – Undervoltage load shedding program database</p>	<p>Translation to new standard.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>The scope of the UVLS database should be limited to systems that can affect the Bulk Power System.</b></p> <p><b>Many UVLS systems are quite local in nature, and independent from other systems. The approach to UV should not be the same as that for underfrequency as UFLS is a single distributed system.</b></p>

<b>Proposed Standard</b>	<b>Prior Planning Measure(s)</b>	<b>Drafting Team Notes</b>	<b>a) Reliability Need</b>	<b>b) Acceptable Translation</b>	<b>c) Reason for negative response or additional comments.</b>
<p><b>PRC-021-1</b> Under-Voltage Load Shedding Program Data</p>	<p><b>III.E.M1</b> – Under-Voltage load shedding program documentation</p>	<p>Translation to new standard.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><b>The scope of the UVLS database should be limited to systems that can affect the Bulk Power System.</b></p> <p><b>Many UVLS systems are quite local in nature, and independent from other systems. The approach to UV should not be the same as that for underfrequency as UFLS is a single distributed system.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>PRC-022-1</b> Under-Voltage Load Shedding Program Performance</p>	<p><b>III.E.M5</b> – Analysis and documentation of UVLS program performance</p>	<p>Translation to new standard.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>The scope of the standard should be limited to systems that can affect the Bulk Power System.</b></p> <p><b>Simulation of all operations of UVLS seems onerous and it is recommended that simulations should only be performed for reportable incidents.</b></p>
<p><b>PRC-023-1</b> Redundancy of Transmission Protection Systems</p>	<p><b>III.A.M2</b> – Redundancy requirements for transmission protection systems.</p>	<p>Translation to a new standard.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input type="checkbox"/> Agree. <input checked="" type="checkbox"/> Do not agree.</p>	<p><b>In Requirements, it states that each TO shall provide protection system redundancy with each new or upgraded Bulk Electric System protection system installation. The standard should address instances where physical limitations of existing installations prevent meeting all the applicable criteria items.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
<p><b>VAR-001-1</b> Voltage and Reactive Control (Revision of Version 0 Standard)</p>	<p><b>III.C.M1</b> – Operation of all synchronous generators in the automatic voltage control mode (documentation) <b>III.C.M3</b> – Generator operation for maintaining network voltage schedules (documentation) <b>III.C.M5</b> – Tap settings of generator step-up and auxiliary transformers (documentation)</p>	<p>Merged into existing standard VAR-001. Merged III.C.M1 (R10 and M2), III.C.M3 (R3 and M1), and III.C.M5 (R11 and M3).</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><b>R2 should refer to Table 1 in TPL-001-0 to 004-0 for those contingency conditions that shall be considered.</b></p>
<p>VAR-002-1 Generator Operation for Maintaining Network Voltage Schedules</p>	<p><b>III.C.M2</b> – Operation of all synchronous generators in the automatic voltage control mode (data) <b>III.C.M4</b> – Generator operation for maintaining network voltage schedules (data) <b>III.C.M6</b> – Tap settings of generator step-up and auxiliary transformers (data)</p>	<p>Translated to new standard merging III.C.M2 (R1 and M1), III.C.M4 (R1.3, R3, R4 and M2), and III.C.M6 (R5, R6, and M3).</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	<p><b>The generators that are required to operate and report should be limited to those that are considered to be part of the Bulk Power System.</b></p>

Proposed Standard	Prior Planning Measure(s)	Drafting Team Notes	a) Reliability Need	b) Acceptable Translation	c) Reason for negative response or additional comments.
VAR-003-1 Assessment of Reactive Power Resources	<b>I.D.M1</b> – Adequate voltage resources to meet future customer demands	Translation to new standard.	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	<b>R2.2 should require that assessments be performed at least every two years, instead of every five years.</b>
VAR-004-1 Generators Performance During Temporary Frequency and Voltage Excursions	<b>III.C.M7</b> – Generators performance during temporary excursions in frequency, voltage, etc.	Translation to new standard.	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	<b>Typo in "Proposed Effective Date" November.</b>

**Question 2:** The drafting team proposes to drop the standards listed below for the reasons cited. A more detailed justification for dropping these standards is provided in the file listed as “standards proposed for deletion”. Commenters are requested a) to indicate whether they agree each standard should be dropped and b) to provide any comments.

Number and Title	Reason for Proposed Deletion	a) Agree/disagree with dropping standard?	b) Please comment on drafting team notes in posted standard.
<p><b>I.D.M2</b> – Coordinate and optimize the use of generator reactive capability</p>	<p>Already covered by TPL-001, TPL-002, TPL-003, TPL-004. Part of proposed VAR-001 (III.C.M5), VAR-002 (III.C.M6), MOD-026 (II.B.M4, II.B.M6).</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>II.D.M3</b> – Consistency of actual and forecast demands and controllable demand-side management data reported for reliability and to government agencies</p>	<p>Does not impact the overall reliability of the interconnected electric transmission grid. Demand-side management data is already covered in Version 0 standard MOD-016.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	

Number and Title	Reason for Proposed Deletion	a) Agree/disagree with dropping standard?	b) Please comment on drafting team notes in posted standard.
<p><b>II.E.M1</b> – Customer (dynamic) demand characteristics to be determined and reported for reliability analyses</p>	<p>It is currently not practical to implement these standards today. Objectives of III.E.M1 through M3 are important to grid reliability, but no practical guidelines exist today to ensure LSEs and PAs obtain accurate</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>II.E.M2</b> – Requirements for determining customer (dynamic) demand characteristics to be included in procedural manuals</p>	<p>dynamic demand characteristics. From a modeling perspective, there is no common method for modeling these demand characteristics among the various programs used by the industry to assess dynamic simulations.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>II.E.M3</b> Load-serving entities to provide customer (dynamic) demand characteristics</p>		<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	

Number and Title	Reason for Proposed Deletion	a) Agree/disagree with dropping standard?	b) Please comment on drafting team notes in posted standard.
<p><b>III.B.M1</b> – Assessment of transmission control devices</p>	<p>This requirement is included within the scope of existing standards TPL-001 through 004.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>IV.B.M1</b> – Documentation of Regional load restoration policies and programs</p>	<p>Automatic Load Restoration systems are used only in parts of three regions. Regional requirements apply</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>IV.B.M2</b> – Documentation of automatic load restoration programs</p>	<p>where appropriate. If the standard was approved, it would apply only to a small number of entities.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>IV.B.M3</b> – Assessment of the effectiveness of automatic load restoration programs</p>	<p>Typically implemented at the distribution level with limited significance for Bulk Electric System reliability. Addressed in</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	
<p><b>IV.B.M4</b> – Automatic load restoration equipment maintenance requirements</p>	<p>restoration plans and procedures specific to each entity owning and operating such systems.</p>	<p><input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.</p>	

**Question 3:** Do you agree with the proposed new definitions of terms listed below?

Term	Proposed Definition	Reference	a) Agree or Disagree	b) Reason for negative response or additional comments.
<b>Cranking Path</b>	A portion of the electric system that can be isolated and then energized to deliver electric power from a generation source to enable the startup of one or more other generating units.	Used in EOP-005	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	
<b>Disturbance Monitoring Equipment</b>	Device(s) capable of detecting and recording System electrical data during a Disturbance. Examples include sequence of event recorders, fault recorders, and dynamic disturbance recorders.	Used in PRC-002, PRC-018, and MOD-22	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	
<b>Power Electronic Control Device</b>	A device using semiconductor technology to provide dynamic control of one or more electric power system quantities. Examples include high voltage direct current links, static Var compensators, thyristor-controlled series capacitors, and unified power flow controllers.	Used in MOD-028	<input checked="" type="checkbox"/> Agree. <input type="checkbox"/> Do not agree.	

**Question 4:** The drafting team estimates the proposed standards can be balloted in August 2005 and submitted for Board of Trustees adoption on November 1, 2005. The drafting team proposes to make the standards effective upon adoption by the Board. Are there any of the proposed standards that should be made effective at a later date? If so, please indicate which standard(s) you recommend to be implemented at a later date, a preferred effective date, and your reasons for a delay. Please indicate if you believe field testing is required, the nature of the field test and why field testing is needed.

Standard Number	Field Testing Required	Recommended Effective Date	Justification for Deferred Implementation or Field Testing
All	<input checked="" type="checkbox"/> Yes. <input type="checkbox"/> No.		<p>The NYSRC suggests that the effective date to comply with the Standards be six months from the date of their adoption by the Board. We feel that all the standards should go through a field test. Lack of performing a completed field test process and implementation is the reason why they were omitted from the Version 0 Standards. This has not yet been addressed. Furthermore, although the standards have some laudable reliability requirements there may not, at this time, be sufficient standards and processes available to allow entities to achieve compliance with the reliability objective.</p>
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		

	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		
	<input type="checkbox"/> Yes. <input type="checkbox"/> No.		

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**Question 4:** Do you have any additional comments not addressed by the other questions?

Comment

**Many of the proposed Phase III/IV standards are revisions of Version 0 standards that have been adopted. However, the clean versions of these standards do not indicate such. Therefore, we suggest that the second sentence on the first page of each of these standards be revised as follows: " This proposed standard is a revision of \_\_\_\_\_, which translates planning measure(s) \_\_\_\_\_. This (These) measure(s) was (were) not included ....."**