

**COMMENT FORM**

**Phase III-IV Planning Standards Not Developed in Version 0 Reliability Standards**

This form is to be used to submit comments on the four SARs to translate the Phase III-IV Planning Standards that were not developed in the Version 0 Reliability Standards project. Comments must be submitted by **January 7, 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) on 609-452-8060.

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.)		
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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 the four SARs proposing to develop reliability standards to replace the Phase III-IV Planning Standards that were not developed in the Version 0 Reliability Standards. The scope of work is focused on translating the existing planning standards that were not included in Version 0, not on developing new standards. The four SARs are as follows:

Disturbance Monitoring and Reporting

Modeling

Protection and Control

Black Start Capability

**Question 1: Scope of Work**

Do you agree that the list of planning standards and measures indicated in the four SARs, taking in to consideration the standards already developed in Version 0, would complete the translation of all existing planning standards?

Yes.

No.

Comments

**Measurement III.C.M10 is listed twice in the four SARs, while Measurement III.C.M11 is missing from these SARs.**

**A Measurement III.A.M2 is included in Protection & Control SAR. We could not find this measurement on any NERC document listing Phase III & IV Measurements.**

**Question 2: Reliability Need**

Do you agree there is a reliability need for all of the standards proposed in these four SARs? If you have any concerns regarding reliability need, please note them in your comments.

Yes.

No.

Comments

**Except for Measurement III.A.M2 (discussed in our response to Question 1), we agree there is a reliability need for all the standards proposed in the four SARs.**

**Question 3: Grouping of the Standards for Development Purposes**

Because the proposed scope of work is large, the requester has grouped the proposed standards into four SARs. Do you agree this is an appropriate way to organize the work? What improvements would you suggest to grouping the development work?

Yes.

No.

Comments

**The NYSRC believes that four proposed SAR measurement groups are disjointed. Certain SAR groups presently contain unrelated measurements. For example, the Black Start Capability SAR includes Automatic Restoration of Load measurements IV.B.M1-4, which are unrelated to black start; and the Modeling SAR includes several non-modeling measurements, i.e., Generation Protection & Control measurements III.C.M1-9. Also, certain related measurements are spread into different SAR groups. For example, the Phase III & IV measurements related to Generation Control and Protection (III.C) are separated into three different SAR groupings.**

**Therefore, we suggest that the Phase III & IV measurement groupings be reorganized recognizing the above concerns. This reorganization should include more appropriate measurement groupings for the Black Start Capability, System Modeling, Disturbance Monitoring, and Protection & Control SARs, with possibly a new SAR to include Voltage and Reactive standards. Such a reorganization would not only make the SAR and Standard review process easier, but the final standards would be developed on a more consistent basis.**

**Question 4: Challenges to Achieving Consensus**

Some of the proposed standards may require more work than others to reach industry consensus on approving the standards. Please rate each proposed standard below by indicating the level of difficulty you foresee in achieving consensus on the standard. Please indicate specific challenges you think must be overcome to complete the standard and achieve industry consensus.

<b>Difficulty Reaching Consensus</b>	<b>Topic</b>	<b>Challenges to Overcome to Achieve Consensus</b>
<b>SAR- Disturbance Monitoring and Reporting</b>		
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	I.F.S1.M2, List of monitoring equipment installations & operating status	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	I.F.S2.M3, Disturbance monitoring data reporting Requirements	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	I.F.S2.M4, Recorded fault and disturbance Data	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	I.F.S2.M5, Use Database	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.D.S1.M2, Reporting procedures that ensure against double counting or omission of customer demand data	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.D.S1-S2.M3, Procedures requiring consistency of data reported for reliability purposes and to gvt agencies	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S6.M10, Procedure to monitor/ review/ analyze/ correct trip operations of generator protection equipment	
<b>SAR - Modeling</b>		
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	I.D.S1.M1, Assessment of reactive power resources	<b>Development of this standard and the next one should recognize and be coordinated with the Version 0 VAR standards.</b>
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	I.D.S1.M2, Generator reactive power capability	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.B.S1.M1, Procedures for validating generation equipment data	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.B.S1.M2, Verification of gross and net dependable capability	

<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.B.S1.M3, Verification of gross and reactive power capability of generators	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.B.S1.M4, Test results of generator voltage regulator controls and limit functions	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.B.S1.M5, Test results of speed/load governor controls	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.B.S1.M6, Verification of excitation system dynamic modeling data	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.E.S1.M1, Plans for the evaluation and reporting of voltage and frequency characteristics of customer demands	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.E.S1.M2, Documentation of requirements for determining dynamic characteristics of customer demands	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	II.E.S1.M3, Customer (dynamic) demand data	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S1.M1, Procedure by system operator for reporting operation without automatic voltage control mode	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S1.M2, Log of operation without automatic voltage control mode by generator owner	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S2.M3, Documentation of schedule for maintaining network voltage	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S2.M4, Log operation not maintaining network voltage schedules	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S2.M5, Reporting procedures for tap settings of generator step-up and auxiliary transformers	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S2.M6, Tap settings data of generator step-up and auxiliary transformers	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S2.M7, Requirements for withstanding temporary excursions in frequency, voltage, etc.	

<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S4.M8, Information on generator controls coordination with unit's short-term capabilities and protective relays	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.C.S5.M9, Information on speed/load governing system	
<b>SAR – Protection and Control</b>		
<input type="checkbox"/> Easy <input type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.A.S2M2, Redundancy requirements for transmission system protection	<b>See our comment on this measurement under Question 1.</b>
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.B.S1.M1, Assessment of reliability impact of transmission control devices	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.B.S1.M2, Transmission control device models and data	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.B.S1.M3, Periodic review & validation of settings & operating strategies	
<input type="checkbox"/> Easy <input type="checkbox"/> Medium <input checked="" type="checkbox"/> Difficult	III.C.S6.M10, Procedure to monitor/ review/ analyze/ correct trip operations of generator protection equipment	
<input checked="" type="checkbox"/> Easy <input type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.E.S1-S2.M1, Documentation of undervoltage load shedding program	
<input checked="" type="checkbox"/> Easy <input type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.E.S1.M2, UVLS Regional Database	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	III.E.S1.M5, Analysis & documentation of UVLS event	
<input type="checkbox"/> Easy <input type="checkbox"/> Medium <input checked="" type="checkbox"/> Difficult	III.C.S7.M12, Maintenance / testing Program of generation equipment protection systems	
<b>SAR – Black Start Capability</b>		
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	IV.A.S1.M2, Demonstrate by simulation and testing blackstart unit can perform its function	<b>Development of this standard and the next standard should recognize and be coordinated with the Version 0 EOP Standards</b>
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	IV.A.S1.M3, Diagram blackstart units and initial switching	
<input checked="" type="checkbox"/> Easy <input type="checkbox"/> Medium <input type="checkbox"/> Difficult	IV.B.S1.M1, Document automatic load restoration (ALR) programs including database	

<input checked="" type="checkbox"/> Easy <input type="checkbox"/> Medium <input type="checkbox"/> Difficult	IV.B.S1.M2, Document auto load restoration program with regional requirements	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	IV.B.S1.M3, Assess effectiveness of automatic load restoration programs	
<input type="checkbox"/> Easy <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Difficult	IV.B.S1.M4, Document auto load restoration equipment testing and maintenance program	

**Question 5:**

Please provide any additional comments you have regarding the proposed development of Phase III-IV planning standards that were not developed in Version 0.

**The drafting teams have been tasked to recommend whether the Phase III-IV standards should be balloted individually or in groupings. We suggest that each standard to individually balloted, as is done with other proposed standards. If instead the standards were balloted in groups, a problem with one or two standards could result in a NO vote on the entire group.**

**Each proposed Phase III-IV standard should reference related Version 0 standards.**