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Question 1:

Recognizing the Draft 1 Version 0 Standards as a preliminary work in progress that will continue to be refined by the Drafting Team in response to industry comments, if you were asked today to consider voting to approve (single block vote) the Version 0 Standards as presented, how do you think you would vote?

- Would approve the standards conditionally, assuming acceptable improvements are made in response to comments.
- Would not approve the standards.
- Would abstain.

Comments

The New York State Reliability Council (NYSRC) supports the comments separately provided by the Northeast Power Coordinating Council (NPCC) on the Draft 1 Version 0 Reliability Standards. The comments provided by the NYSRC in this questionnaire supplements and reinforces the NPCC comments.

An improvement that must be made in the next draft in order make the Version 0 Standards acceptable is to retain the existing Planning Standards (S1, S2, etc.) in the translation. Despite the translation comments that say the standards are not used directly in the translation because their content is repeated and detailed more completely in the measurements, we find that critical requirements that are stated in the standards have not been fully translated and are omitted in Version 0. Therefore, we strongly suggest that the S1, S2, etc. language be retained in the Version 0 standards. It is imperative that the existing standards not be weakened in the translation process.

We agree with the footnote that applies to Table 1 in the Planning Standards (page 21) that says, "Any Region may implement standards that are more stringent, but not inconsistent with NERC's industry-wide standards." However, this statement should apply to ALL Version 0 standards, not just Table 1. We therefore recommend that this or a similar statement be inserted in an appropriate location to make it is clear that it applies to all Version 0 standards.

Question 2:

Are there any "show stoppers" in the approach or results to date that would prevent you from approving the standards? If so, what are they?

Comments

Phase III & IV Planning measurements that have not been field tested must not be included with the Version 0 standards. Also refer to our concern about the omission of many of the requirements of Planning Standards S1, S2, etc. in the translation process covered under Question 1.

Question 3:

As a whole, do you agree that the content of the Draft 1 Version 0 Standards is a reasonable translation of existing NERC reliability rules that does not significantly change current reliability obligations? (You will have a chance to comment on individual standards and requirements later.)

- Agree.
- Disagree.

Comments

Please refer to our Question 1 comments.

Question 4:

There are numerous areas where the Drafting Team found it could easily eliminate redundancies in the requirements across various standards and improve the standards by better grouping the requirements into logical areas. However, the Drafting Team resisted making those changes in the first draft to ensure the industry would be able to more easily visualize the mapping from the existing documents to the Version 0 Standards. Should the Drafting Team minimize changes to eliminate redundancies and improve organization of the standards, or should the team make those improvements in Version 0?

- Make improvements to reduce redundancies and better group the requirements.
- Minimize the changes to simplify the transition from existing rules to Version 0.

Comments

Question 5:

As a whole, do you agree that the designation of functions in the Functional Model is acceptable? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree.

Comments

Question 6:

The operating policies make frequent reference to Operating Authorities as being the accountable entities. In adopting the Functional Model into the Version 0 standards, the Drafting Team had to make numerous extrapolations of the intent of the operating policies. For the most part, the requirements are addressed to Reliability Authorities, Balancing Authorities, and Transmission Operators. As needed, requirements specify Generator Operators, Transmission Service Providers, Load Serving Entities, and Purchasing-Selling Entities.

The Drafting Team seeks comments on whether the references to Operating Authorities should include these other functions when appropriate, or should an assumption be made in Version 0 that the reliability obligations of these other functions are addressed in service agreements.

Include these other functions as appropriate in a specific requirement.

Do not include these functions in the requirements.

Comments

Question 7:

No potential business practice standards were identified in the Version 0 planning standards. In translation of the operating policies, areas were identified where business practices could potentially be developed. However, the Drafting Team felt that the reliability requirements and business practices are so intertwined that to separate them would require substantial revisions to the requirements that would exceed the mandate of “no changes to the reliability rules in Version 0.” The Drafting Team identified the following areas in which it would recommend business practices be developed in Version 0:

- Operating Policy 1D (including Appendix 1D) — Time error correction procedures, except the ability of the Reliability Authority to halt a time error correction for reliability considerations.
- Operating Policy 1F — Inadvertent energy payback, except that inadvertent energy accounting remains a reliability requirement.
- Operating Policy 3 and Appendices 3A1, 3A2, 3A3, and 3A4 — Tagging procedures, E-Tag specifications and other sections of Operating Policy 3. Essential requirements to tag transactions and tag timing requirements remain reliability standards.

As a whole, do you agree that this allocation of potential business practice standards? (You will have a chance to comment on individual standards and requirements later.)

Agree.

Disagree

Comments

Question 8:

The Drafting Team seeks inputs on any other policies, standards, or appendices that should be considered as business practices in Version 0 and removed from the NERC standards. Please identify the policy, appendix, or planning standard by number and name and state your reason for recommending that material become a business practice standard in Version 0.

Comments

Question 9:

The Drafting Team is recommending a partial implementation of the Functional Model by assuming all of the Reliability Coordinator requirements in current policy should be assigned to Reliability Authorities. The Drafting Team believes implementation is simplest if the existing Reliability Coordinators are registered as the Reliability Authorities. However, this approach is flexible to accommodate regions in which existing control areas are deemed to be Reliability Authorities. In these regions, the Reliability Authority may delegate tasks “upward” to a Reliability Coordinator organization, although the registered Reliability Authority would retain accountability for complying with all of the applicable standards.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 10:

The Drafting Team recommends that the Interchange Authority function not be adopted in the Version 0 standards. To do so would require changes to tools and procedures, as well as reliability obligations. The Drafting Team recommends retaining the BA to BA scheduling method in current practice until new standards can be developed later for adopting the Interchange Authority function.

Do you agree with this approach?

Agree.

Disagree.

Comments

Question 11:

During the posting of the Version 0 SAR, some commenters indicated that planning standards that had not been completely field-tested should not be included in Version 0. Phase 3 planning standards were field-tested but no changes were made to these standards following the field tests. The results of the Phase 3 field tests were mixed — several measures need only minor changes, and other measures need more significant changes. The compliance templates just approved by the NERC Board in April 2004 do include some of the Phase 3 planning standards. Any Phase 3 planning standard that was approved for full implementation by the board is assumed to be accepted by the industry, and is proposed for inclusion in Version 0. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. If a measure is removed, it will be “retired” when Version 0 is approved and can only be replaced by going through the new reliability standards process. At this point, all Phase 3 measures are included in the first draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
57	I. System Adequacy & Security. F. Disturbance Monitoring	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65	III. System Protection & Control. C. Generation	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M8	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M9	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M10	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M11	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M12	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	III. Sys Protection & Control E. Under Voltage Load Shed	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	IV. System Restoration A. Sys Blackstart Cap.	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71	IV. System Protection B. Automatic Restoration of Load	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

Although the NYSRC agrees with the need for most of the above standards, we believe that they be field tested prior to implementation. We therefore strongly recommend that the SAR process be used to implement these standards.

Question 12:

During the posting of the Version 0 SAR, some commenters indicated that Planning Standards that had not been field-tested should not be included in Version 0. None of the Phase 4 Planning Standards were field-tested. If the industry indicates there are measures that need additional work, these will be returned to the Planning Committee for additional work and re-submission through the new standards process. At this point, all Phase 4 Measures are included in the 1st draft of Version 0. Please indicate in the table below which Phase 3 measures you think should be kept or deleted from Version 0.

Version 0 Standard	Existing Planning Standard	Existing measure	Keep	Delete
64	I. System Adequacy & Security D. Voltage Support and Reactive Power	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57	I. System Adequacy & Security. F. Disturbance Monitoring	M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	II. System Modeling Data B. Generation Equipment	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	II. System Modeling Data D. Actual & Forecast Demands	M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
62	II. System Modeling Data E. Demand Characteristics (Dynamic)	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66	III. System Protection & Control B. Transmission Control Devices	M1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		M3	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

See Question 11 response.

Question 13:

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Operating Policies (General)			The business items assigned to NAESB should be included in the NERC version 0 standards. NERC should not be relying on NAESB to meet the NERC defined dates.
Operating Policies (General)			Many of the standards omit the guides. These guides provide usefull and pertinent information and should remain as part of the standsards, at least in version 0
Operating Policies (General)			Many of the introductions were deleted. The introductions serve as a short summary of the standard and should be included in version 0
Surveys Standard		R2	Old section 2.1.3 (FRS Surveys) is deleted without explanation except to say that it is contingent upon approval of Section C (Policy 1-003). This is unclear since section C defines how to determine and use the frequency bias and 2.1.3 specifies that the data needed to calculate the frequency bias is collected.
Policy 2, Section A, item 1.1		R2	The term “credible nature” is overly vague. Some clearer terms or definition must be included in version 0. Waiting for version 1 will allow months of uncertainty.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 2, Section A, 008-R4		008-R4	Reword as “The Reliability Authority shall evaluate actions taken to address an SOL or IROL violation. If the actions taken are not appropriate or sufficient, the RA shall direct actions, as required, to the TO or BA to return the system to within limits.”
Policy 2, Section A, 009-R6 (3.2) & 009-R10 (4.1)		009-R6 & 009-R10	These sections should be elaborated to address pockets of inadequate reactive reserve that are solved by an SPS after the first contingency.
Policy 4, Section A,		014-R1	Add to end of sentence “...use and generation derates”
Policy 4, Section C		016-R1	Add to end of first sentence “...as well as the local transmission system.”
Policy 4, Section B		015-R1	Reference is made to Attachment A and Appendix 4B yet they are not part of the red line standard.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 4, Section B		015-R4, Data section 5.1	Section 5.1 refers to an Addendum A, yet that is not part of the red line standard.
Policy 5, Section B		n/a	A section should be added defining the responsibilities of the generator owners, LSEs and distribution providers to notify the transmission operator of any problems that could impact the transmission system.
Policy 5, Section D		Introduction item 1.1	Replace “Operating Authorities” with “Reliability Authority and Transmission Operator”
Policy 5, Section E		Introduction	The term Operating Authority is obsolete.
Policy 5, Section E, Section F & Section G		General	Replace “System Operators” with “Transmission Operators”

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 6, Section A		024-R4	The LSE, TSP and GOP should coordinate with their host Transmission Operator who will be the interface with the BA.
Policy 6, Section D		027-R1, R2, R3	I disagree with the note to delete the second paragraph of the introduction. The first two sentences of the paragraph are not covered in requirements 3 and 4 as stated.
Policy 7, Section A		First Paragraph	What does this mean? The first part is not a sentence and the second part is a comment. Also, provide “appendix 7A”
Policy 7, Section A-D		General	This standard has a number of comments and questions in the red line document. It is impossible to adequately review the document when it is clearly incomplete.
General		Measures	In many cases the measures have been removed. For version 0 they should be retained for clarity. An example is old policy 8A (new standard 30). The red line standard is one sentence. The measures give the details.

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments
Policy 8, Section A		030-M1	State the details that are to be included in the control room job description document

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Standard #	Section # (Planning Only)	Requirement or Measure #	Comments

Question 14:

Please provide any additional comments you have regarding the Draft 1 Version 0 Reliability Standards.

To allow an easier review of the draft standards, we suggest that Draft 2 include the standard number and title in a header or footer on every page .