

Comment Form for Proposed Procedure for Development of Compliance Elements in a Standard

Please use this form to submit comments on Proposed Procedure for Development of Compliance Elements in a Standard. Comments must be submitted by **May 18, 2006**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words "Procedure for Development of Compliance Elements" in the subject line. If you have questions please contact Sandy Cominski at sandi.cominski@nerc.net or 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.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
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"/> FRCC	<input checked="" type="checkbox"/> 2 – RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 – Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 – Federal, State, Provincial Regulatory or other Government Entities

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Please Enter All Comments in Simple Text Format.

1. Do you agree with the proposal to move the development of compliance elements of a standard into a due process in the NERC compliance enforcement program?

- Yes
 No

Comment : The New York State Reliability Council (NYSRC) strongly believes that there should NOT be a "separate due process" to develop the compliance elements of a reliability standard. We agree that in parallel with the development of a standard by a standard drafting team, the CCC or CCMC of NERC be assigned the task of determining the elements for compliance. However, the compliance elements should be retained, as they are now, within the standard. The drafting team should be responsible for developing the reliability requirements and the compliance committees should be responsible for ensuring that the resulting elements were measureable and clear.

2. Do you agree with the proposed process for approving compliance elements: a) 30-days public comment, then b) Compliance and Certification Committee approval, and then c) NERC Board of Trustees approval?

- Yes
 No

Comment : As stated above, the NYSRC strongly believes that, although the compliance elements may be developed by groups outside of the drafting team, it is important that development of the compliance elements remain within the NERC RS process, and should remain part of the RS. As such, the ballot body should continue to vote for the requirements of the standard as well as for its related compliance elements.

3. Do you agree with the proposal to publish the compliance elements in a compliance catalog managed by the NERC compliance enforcement program, separate from but linked to the standards?

- Yes
 No

Comment : We believe this would represent a step "backward" to the old compliance template and standards/policies in effect prior to the adoption of the Version 0 set of standards. There was much confusion in the industry back then and the NYSRC believes that NERC since then has moved in the right direction, making a stand-alone standard with its associated compliance elements in a single document.

4. Do you have any additional comments or specific suggestions to improve the proposed procedure for developing compliance elements for a standard?

Comment : The NYSRC supports the development of the compliance elements of a RS by those most knowledgeable in this area, but strongly believes that it should not be a separate due process nor should the result be a separate catalog of compliance elements. Moreover, by separating the standard from the compliance elements in this way would add to the paperwork and already excessive time to review and comment on the standards that would confront the stakeholders.