

Comment Form for Proposed Version 5 of Reliability Standards Process Manual

Please use this form to submit comments on Draft 1 of proposed Version 5 of the Reliability Standards Process Manual. Comments must be submitted by **May 18, 2006**. You must submit the completed form by e-mailing it to sarcomm@nerc.com with the words "Reliability Standards Process Manual" in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@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 change the name of the Standards *Authorization* Committee to the Standards Committee?

Yes

No

Comment

2. Do you agree with the proposal to change the name of the manual from Reliability Standards *Process Manual* to Reliability Standards *Development Procedure*?

Yes

No

Comment

3. Do you agree with the proposed addition of the nine characteristics of an excellent reliability standard?

Yes

No

Comment : In the second paragraph of this section the New York State Reliability Council (NYSRC) disagrees with the use of the word "excellent" as it is used here. We therefore suggest removing the word "excellent". Also, in the same sentence we recommend that "as previously defined" be inserted following "reliability standard."

In Bullet 3 we suggest removing the last phrase referencing a cost benefit analysis. The language in this bullet seems to suggest the requirement for the type of cost benefit analysis that is proposed in the Cost Benefit Risk SAR, for which we have provided comments. However, the status of this SAR, for which we have expressed concerns, is unknown at this time. We therefore cannot support including a cost benefit analysis for each proposed standard until the SAR, and resulting procedure, fully complete the proper comment process.

4. Do you agree with the proposed addition of the reliability risk factors to the standard template to allow such risk factors to be developed for use in the setting of financial penalties for violations of reliability standards?

Yes

No

Comment :The process should provide additional information identifying which standards are administrative and have no adverse impact on reliability. Those standards that have been identified as Low Risk should not be Reliability Standards. Also, these low risk requirements, as stated in characteristic #2, do not materially contribute to the reliability of the BPS.

5. Do you agree with the proposed transfer of the levels of non-compliance and other compliance information out of the standard template for development in a due process under the NERC compliance program?

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Yes

No

Comment : The NYSRC agrees that the compliance elements could be separately developed by a NERC Compliance Committee; however, this should not be a separate process from development of the reliability requirements, nor should the compliance elements be removed the standard. Although we agree that the standard should be developed separately by the drafting team and the compliance elements developed by the the CCC or CCMC. The compliance committees should be responsible for ensuring that the compliance elements are measureable and clear. Both the reliability requirements and compliance elements should be combined and balloted together (just as now) as part of the ANCI process as one reliability standard in a single document.. We have provided more detailed comments on the "Proposed Procedure for Developing Compliance Elements" comment form.

We suggest removal of the term "due process" in the "Compliance Enforcement Program" section.

6. Do you agree with the proposed modification of the ballot procedure (Step 9) to proportionally discount the vote weight of a segment that has less than 10 entities voting (i.e., the segment would count one tenth of the regular weight of a segment for each of the first nine entities voting in the segment; the segment would have the full weight of a segment if ten or more entities voted)?

Yes

No

Comment : While the NYSRC agrees that this change would alleviate concern for a sparsely populated segment, it is more appropriate to lower the number from 10 to 8 to reflect the number of Regions. This is because in the future there is a possibility that Regions may have their own separate segment.

7. Do you agree with the proposed clarifications to the procedure for the five-year review of existing standards?

Yes

No

Comment : We believe that an additional step should be required before the Review Team submits their recommendation to the Standards Committee. The findings of the review team should be posted for an open comment period to determine if the industry is in agreement with the review team's determination.

8. Do you agree with the proposed changes to the supporting documents for standards, including the requirement that such supporting documents would be approved by the Standards Committee before being posted with the standard?

Yes

No

Comment

9. Do you agree with the proposed revisions to the Registered Ballot Body segment criteria, including the modification to address vendors and consultants?

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Yes

No

Comment : The NYSRC is very concerned that vendors and consultants are not users owners or operators of the BPS. There are potential conflict of interest issues that have been raised for entities engaged in selling goods and services related to the operation and reliability of the BPS and the voting influence they can exercise by being distributed throughout all the Segments.

We further note also that the 12 segments mentioned in the ERO application do not include vendors and consultants. We therefore believe it is inappropriate to include them in the RS voting process.

10. Do you agree with other proposed revisions to the Reliability Standards Process Manual not addressed by the questions above?

Yes

No

Comment : The Reliability Standard definition has a phrase at the end, "but shall not include...". We believe that the Definition should not include what is stated after this phrase. Instead, this could be added as a separate statement following the definition.

11. With due consideration of comments provided above, would you consider that the revised manual:

Is ready for a ballot of stakeholders.

Is not ready for a ballot of stakeholders and requires more work.

Should be withdrawn and the proposed modifications not made.

Comment