

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Mandatory Reliability Standards)
for the Bulk-Power System) Docket No. RM06-16-000**

**COMMENTS OF
THE NEW YORK STATE RELIABILITY COUNCIL**

Pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214 (2005), the New York State Reliability Council LLC ("NYSRC") files these comments in the above-captioned proceeding. In support hereof, the NYSRC states as follows:

I. COMMUNICATIONS

All communications, pleadings, and orders with respect to this proceeding should be sent to the individuals listed below:

Bruce B. Ellsworth
Chairman
NYSRC Executive Committee
46 Tamarack Road
Hopkinton, NH 03229
Telephone: (603) 746-3447
Email: ellsworth@conknet.com

P. Donald Raymond
Executive Secretary
New York State Reliability Council, LLC
14 Thornwood Lane
Fayetteville, NY 13066
Telephone: (315) 637-9002
Email: Raymond40@aol.com

II. BACKGROUND

On April 4, 2006, the North American Electric Reliability Council and its affiliate, North American Electric Reliability Council (jointly "NERC") tendered for filing an application for certification as the Electric Reliability Organization ("ERO") pursuant to Section 215 of the Federal Power Act. In a companion filing, which is the subject of this proceeding, NERC filed

for approval of 102 proposed reliability standards, which are current NERC standards. On May 11, 2006, the Commission issued a staff preliminary assessment of the proposed reliability standards. The staff assessment evaluates the 102 proposed standards and identifies potential deficiencies in the standards. The Commission has established June 26, 2006 as the due date for NERC and third parties to respond to the staff preliminary assessment. On May 31, 2006, the Commission issued a notice of a Technical Conference on July 6, 2006 to consider NERC's petition and address issues raised in the staff assessment.

III. NYSRC FORMATION AND RESPONSIBILITIES

The NYSRC is a limited liability company established to promote and preserve reliability in the New York Control Area ("NYCA")¹ for the benefit of the public and all market participants and is responsible for developing reliability standards ("Reliability Rules"), including the annual state-wide installed capacity requirement for the NYCA, that are implemented by the New York Independent System Operator, Inc. ("NYISO"). The Reliability Rules adopted by the NYSRC are based on the reliability standards established or imposed by the Northeast Power Coordinating Council ("NPCC"), NERC, the Federal Energy Regulatory Commission, the New York State Department of Public Service, the Nuclear Regulatory Commission, and any other government agency with jurisdiction over the reliability of the New York State power system. While the Reliability Rules must be consistent with NERC and NPCC standards (and with ERO reliability standards approved by the Commission), they may include more stringent and more specific criteria and local reliability rules in order to address the special reliability needs of the

¹ The New York Control Area generally encompasses the State of New York.

NYCA, particularly the special needs of New York City and Long Island. The formation of the NYSRC was approved by the Commission when approval was granted for the formation of the NYISO.²

In its orders, the Commission approved the New York State Reliability Council Agreement (“NYSRC Agreement”), among the members of the New York Power Pool (“NYPP”) which established the NYSRC and described its responsibilities, and the NYISO/New York State Reliability Council Agreement (“NYISO/NYSRC Agreement”), between the NYISO and the NYSRC which established the relationship between the NYSRC and the NYISO. The responsibility for conducting the business and affairs of the NYSRC was delegated entirely to the NYSRC Executive Committee, which includes representatives of transmission owners, wholesale suppliers, large industrial and commercial consumers, municipal electric systems and cooperatives, and unaffiliated members.

The NYSRC supports and actively participates in the NERC standards development process, and has provided comments on draft standards and as a member of the Registered Ballot Body has voted on the NERC Version 0 and Version 1 standards.

² *Central Hudson Gas & Electric Corp., et al.*, 83 FERC ¶ 61,352 (1998), *order on reh'g*, 87 FERC ¶ 61,135 (1999); *Central Hudson Gas & Electric Corp., et al.*, 86 FERC ¶ 61,062 (1999), *order on reh'g*, 88 FERC ¶ 61,138 (1999).

IV. COMMENTS

Scope of the NYSRC Comments

The NYSRC comments address (a) the staff preliminary assessment of the proposed standards, (b) several critical standard development issues, including issues addressed in NERC's proposed work plan and in the staff assessment, and (c) NERC's proposed 102 standards on a standard-by-standard basis, with a recommended course of action for each of the standards. (*See attached Appendix*).

Preliminary Staff Assessment of NERC Standards

The NYSRC commends Commission staff for its excellent and comprehensive review of NERC's proposed standards. We agree with the seven major categories of deficiencies in the standards that were identified by staff, and, for the most part, agree with staff's concerns with individual standards.

Major Issues

1. Missing Compliance Elements and Measures

Staff noted that a number of the proposed standards are missing compliance elements and measures. There is an effort underway at NERC to develop these compliance elements and measures as a group. There are 21 standards in this group, with a single NERC drafting team assigned. Our concern is that the attempt to complete all 21 of these standards concurrently will cause a burden to entities participating in the standards process and hinder the effective development of the standards. In addition, some of the standards require further work before they can be properly aligned with the missing compliance elements and measures. For example, if a standard requires further clarity or does not adequately identify the parties responsible for compliance, those changes should be made before the compliance elements and

measures are adopted. Therefore, we suggest that the effort to provide the missing compliance elements be re-opened, and that these elements not be revised as a package, so that a better result may be achieved.

The NERC work plan anticipates that new compliance elements and measures will be ready for implementation beginning January 1, 2007, when NERC recommends that the standards be adopted. However, if the standards are to be individually revised, a January 1, 2007 completion date may not be realistic.

We recommend, therefore, that, in most cases, standards that are critical to reliability with missing compliance elements and measures be approved conditionally and that standards that are less critical with missing compliance elements and measures be remanded.

2. NERC Plan to Separate the Compliance Element Development Process from the Standard Development Process

The NERC work plan calls for the separation of compliance elements from the standards and that they be developed through a separate process. We have expressed concern with this plan in our comments on a proposed revision of the NERC Reliability Standards Process Manual, submitted on May 17, 2006. Many other entities provided similar comments. We are opposed to the development of any portion of a standard in a separate forum or process because all aspects of standard development are related and should be developed in the same process. The comprehensive development of a standard will ensure that all of its components are integrated and that the compliance elements and measures are properly designed to ensure effective implementation of the standard. The NERC drafting teams can be supplemented to ensure that the expertise needed for the development of all aspects of a standard is provided.

Recently, the Standards Process Manual drafting team, in response to comments on the

first draft of the Manual revision, proposed that the compliance elements be developed with each standard and that they be balloted as part of the standard. We support this recent drafting team recommendation.

3. Implementation of Violation Risk Factors

The NERC work plan calls for the development of violation risk factors for all standards. We strongly support the development of risk factors and recommend that the Commission follow that approach. There is a value to prioritizing the standards based on risk. Not all standards, if violated, would pose an equal risk to reliability. The NYSRC proposed a set of risk factors in response to a NERC survey in early June. We used these risk factors to rank each of the 102 proposed standards in our evaluation set forth in the Appendix to these comments.

4. Standards that Lack Specificity and May Not Be Enforceable

The Commission staff has expressed its concern with a number of standards that provide general direction to the Regional Reliability Organizations (“RROs”) and may not be enforceable under Section 215 of the Federal Power Act (the “Fill in the Blank Standards”).

There is an effort underway at NERC to review this set of standards. Given this effort and the question as to their enforceability, these standards should be either conditionally approved or remanded, depending on how critical they are to reliability. There are a total of 26 standards subject to this concern.

5. Technical Adequacy

The staff assessment includes Technical Adequacy as one of its areas of concern. The staff assessment includes a warning “that a ‘lowest common denominator’ approach will not be

acceptable if it is not sufficient to ensure system reliability.”³ The NYSRC shares staff’s concern. We believe that there may be a tendency for a standard drafting team, in order to achieve a consensus on a standard, to adopt a lowest common denominator approach in developing a standard. For example, over the past two years the NYSRC has been very active in commenting on a draft standard covering the methodology of determining system operating limits that omits consideration of certain credible contingencies that we believe are important to include in the standard in order to maintain adequate reliability.⁴ We have repeatedly stated in our comments to NERC that adopting the standard as presently drafted would weaken system reliability. We believe that this standard, as presently drafted, may be an example of the use of a lowest common denominator approach to reliability standard development.

6. NERC Standards Balloting Procedure

The NYSRC does not believe that the existing voting procedure, using the ANSI process, provides a fair or effective voting mechanism for the development of acceptable reliability standards. For example, if all those entities registered in the Ballot Body, as of June 12, 2006, were to vote on a particular standard, the voting strength of each entity registered in Segment 8 (Small End-Use Customers, with 17 registered ballot body members), would be seven times the voting strength of an entity in Segment 1 (Transmission Owners, with 122 registered ballot body members). This is true despite the fact that the organizations in Segment 1 have extensive expertise in the development and implementation of reliability standards. We recommend that

³ Staff Preliminary Assessment of NERC’s Proposed Mandatory Reliability Standard, Technical Adequacy, at p. 6.

⁴ Proposed NERC standard FAC-010-1, System Operating Limits Methodology.

the Commission review the present composition of the voting segments of the Ballot Body and the NERC balloting procedure, to ensure that they are consistent with development of technically sound and effective reliability standards.

We support the proposal in the NERC work plan to allow partial weighting of a segment that has less than 10 voters for a standard action. This change alone, however, will not adequately address the current deficiencies in the NERC balloting procedure.

NYSRC Assessment of the 102 Proposed NERC Reliability Standards

The staff seeks comments on whether proposed standards meet the statutory criteria and should be approved, or have deficiencies and should be revised and accepted conditionally or remanded. The staff further recommended that standards with deficiencies that have the greatest importance to system reliability be given priority for revision. The NYSRC has prepared an evaluation of the proposed standards, as suggested by staff.

The table in the Appendix to these comments provides for each standard (1) a risk violation factor based on NYSRC's response to a NERC risk factor survey discussed above (used to rank the standard according to how its violation would impact bulk power system reliability); (2) deficiencies found in the standard; and (3) a recommended Commission action to "approve," "conditionally accept," or "remand" the standard. In addition, there are a few standards that the NYSRC recommends be withdrawn.

The NYSRC evaluation recommends Commission action based on the following general guidelines:

APPROVE: A high or medium risk standard with no major flaws.

CONDITIONALLY ACCEPT: A high risk standard with deficiencies or a medium risk

standard with minor deficiencies. These standards deserve high priority for improvement.

REMAND: A medium risk standard with deficiencies and all lower risk standards. The medium risk standards that are remanded should have a medium priority for improvement, while lower risk standards should have a lower priority for improvement.

The NYSRC recommends that the Commission consider initially approving or conditionally accepting only those standards that are considered as the most important to system reliability (*i.e.*, the high and medium risk standards). Given the difficulty of considering 102 standards in a limited time period it may be advisable for the Commission to remand or delay approval of all lower risk standards until the more important standards have been considered, revised and approved. The current NERC standards that are remanded should continue to be voluntary reliability standards until approved by FERC in the future as mandatory standards.

Based on the number or seriousness of deficiencies found, there are some exceptions to these guidelines.

Our evaluation concludes that 19 NERC reliability standards should be approved, 48 should be conditionally accepted, 32 should be remanded, and three should be withdrawn. For those standards with deficiencies, we recommend that priorities for their improvement be established based on their relative importance to system reliability.

V. CONCLUSION

For the reasons stated above, the NYSRC requests that the Commission take action consistent with its comments herein.

Respectfully submitted,

/s/ Bruce B. Ellsworth

P. Donald Raymond
Executive Secretary
New York State Reliability Council, LLC
14 Thornwood Lane
Fayetteville, NY 13066
Telephone: (315) 637-9002
Email: Raymond40@aol.com

Bruce B. Ellsworth
Chairman
NYSRC Executive Committee
46 Tamarack Road
Hopkinton, NH 03229
Telephone: (603) 746-3447
Email: ellsworth@conknet.com

Dated: June 26, 2006

Appendix

NYSRC Evaluation of NERC Standards*

Standard Number	Title	Risk Violation Factor**	<u>Deficiencies Identified</u>	NYSRC Recommendation to Approve, Conditionally Accept, Remand, or Withdraw Standard
			Including: <ul style="list-style-type: none"> • Lacks Measures & Compliance Elements • Unclear Enforceability (“Fill-in-the-Blank” Standard) • Other Deficiencies and Comments 	
BAL-001-0	Real Power Balancing Control Performance	Lower		Remand
BAL-002-0	Disturbance Control Performance	High	Unclear Enforceability	Conditionally Accept
BAL-003-0	Frequency Response and Bias	Medium	Lacks Measures and Compliance Elements	Remand
BAL-004-0	Time Error Correction	Lower	Lacks Measures and Compliance Elements	Remand
BAL-005-0	Automatic Generation Control	High	Lacks Measures and Compliance Elements	Conditionally Accept
BAL-006-0	Inadvertent Interchange	Lower		Remand
UA-1200	Urgent Action Standard – Cyber Security	High	See Footnote A.	--
CIP-001-0	Sabotage Reporting	High	Lacks Measures and Compliance Elements	Conditionally Accept
COM-001-0	Telecommunications	High	Lacks Measures and Compliance Elements See Footnote B.	Remand
COM-002-1	Communications and Coordination	High	Lacks Measures and Compliance Elements See Footnote B.	Remand
EOP-001-0	Emergency Operations Planning	High	Agree with Staff concerns.	Conditionally Accept
EOP-002-1	Capacity and Energy Emergencies	High	Agree with Staff concerns.	Conditionally Accept
EOP-003-0	Load Shedding Plans	High	Lacks Measures and Compliance Elements	Conditionally Accept
EOP-004-0	Disturbance Reporting	Medium	Lacks Measures and Compliance Elements and Unclear Enforceability	Remand
EOP-005-0	System Restoration Plans	High	Lacks Measures and Compliance Elements	Conditionally Accept
EOP-006-0	Reliability Coordination – System Restoration	High	Lacks Measures and Compliance Elements	Conditionally Accept
EOP-007-0	Establish, Maintain, and Document a Regional Blackstart Capability Plan	High	Unclear Enforceability in addition to other FERC Staff concerns.	Remand
EOP-008-0	Plans for Loss of Control Center Functionality	High	Agree with Staff concerns.	Conditionally Accept
EOP-009-0	Documentation of Blackstart Generating Unit Test Results	High	Agree with Staff concerns.	Conditionally Accept
FAC-001-0	Facility Connection Requirements	Medium		Approve
FAC-002-0	Coordination of Plans for New Facilities	Medium	Agree with Staff concerns.	Conditionally Accept
FAC-003-1	Vegetation Management Program	High	Agree with Staff concerns.	Conditionally Accept
FAC-004-0	Methodologies for Determining Electrical Facility Ratings	Medium	This standard should be withdrawn because it will be replaced by FAC-008-1.	Withdraw
FAC-005-0	Electrical Facility Ratings for System Modeling	Medium		Approve

Appendix

NYSRC Evaluation of NERC Standards*

Standard Number	Title	Risk Violation Factor**	<u>Deficiencies Identified</u> Including: <ul style="list-style-type: none"> • Lacks Measures & Compliance Elements • Unclear Enforceability (“Fill-in-the-Blank” Standard) • Other Deficiencies and Comments 	NYSRC Recommendation to Approve, Conditionally Accept, Remand, or Withdraw Standard
FAC-008-1	Facility Ratings Methodology	Medium	Agree with Staff concerns.	Conditionally Accept
FAC-009-1	Establish and Communicate Facility Ratings	Medium		Approve
FAC-012-1	Transfer Capabilities Methodology	Medium		Approve
FAC-013-1	Establish and Communicate Transfer Capabilities	Medium		Approve
INT-001-0	Interchange Transaction Tagging	High	Lacks Measures and Compliance Elements	Conditionally Accept
INT-002-0	Interchange Transaction Tag Communication and Assessment	High	Lacks Measures and Compliance Elements	Conditionally Accept
INT-003-0	Interchange Transaction Implementation	High	Lacks Measures and Compliance Elements	Conditionally Accept
INT-004-0	Interchange Transaction Modifications	High	Lacks Measures and Compliance Elements	Conditionally Accept
IRO-001-0	Reliability Coordination – Responsibilities and Authorities	High	We do not agree with Staff that there is unclear enforceability.	Approve
IRO-002-0	Reliability Coordination – Facilities	High	Lacks Measures and Compliance Elements	Conditionally Accept
IRO-003-1	Reliability Coordination – Wide Area View	High	Lacks Measures and Compliance Elements	Conditionally Accept
IRO-004-1	Reliability Coordination – Operations Planning	High	We do not believe that Staff concerns are significant enough not to recommend approval of this high risk standard.	Approve
IRO-005-1	Reliability Coordination – Current Day Operations	High	Lacks Measures and Compliance Elements We agree with Staff that the standard is vague and needs additional work.	Conditionally Accept
IRO-006-1	Reliability Coordination – Transmission Loading Relief	High	We do not believe that Staff concerns are significant enough not to recommend approval of this high risk standard.	Approve
IRO-014-1	Procedures to Support Coordination Between Reliability Coordinators	High		Approve
IRO-015-1	Notifications and Information Exchange Between Reliability Coordinators	High		Approve
IRO-016-1	Coordination of Real-time Activities Between Reliability Coordinators	High		Approve
MOD-001-0	Documentation of TTC and ATC Calculation Methodologies	Lower	Unclear Enforceability	Remand
MOD-002-0	Review of TTC and ATC Calculations and Results	Lower	Unclear Enforceability	Remand

Appendix

NYSRC Evaluation of NERC Standards*

Standard Number	Title	Risk Violation Factor**	<u>Deficiencies Identified</u>	NYSRC Recommendation to Approve, Conditionally Accept, Remand, or Withdraw Standard
			Including: <ul style="list-style-type: none"> • Lacks Measures & Compliance Elements • Unclear Enforceability (“Fill-in-the-Blank” Standard) • Other Deficiencies and Comments 	
MOD-003-0	Procedure for Input on TTC and ATC Methodologies and Values	Lower	Unclear Enforceability	Remand
MOD-004-0	Documentation of Regional CBM Methodologies	Lower	Unclear Enforceability	Remand
MOD-005-0	Procedure for Verifying CBM Values	Lower	Unclear Enforceability	Remand
MOD-006-0	Procedures for Use of CBM Values	Lower		Remand
MOD-007-0	Documentation for the Use of CBM	Lower		Remand
MOD-008-0	Documentation and Content of Each Regional TRM Methodology	Lower	Unclear Enforceability	Remand
MOD-009-0	Procedure of Verifying TRM Values	Lower	Unclear Enforceability	Remand
MOD-010-0	Steady-State Data for Transmission Systems Modeling and Simulation	High	Agree with Staff concerns.	Conditionally Accept
MOD-011-0	Regional Steady-State Data Requirements and Reporting Procedures	High	Unclear Enforceability	Conditionally Accept
MOD-012-0	Dynamics Data for Transmission System Modeling and Simulation	Medium	Agree with Staff concerns.	Conditionally Accept
MOD-013-0	RRO Dynamics Data Requirements and Reporting Procedures	Medium	Unclear Enforceability	Remand
MOD-014-0	Development of Interconnection-Specific Steady State System Models	High	Unclear Enforceability We agree with Staff concerns with this standard, and together with the above deficiency, we recommend that the standard be remanded despite being a high risk standard.	Remand
MOD-015-0	Development of Interconnection-Specific Dynamics System Models	High	Unclear Enforceability We agree with Staff concerns with this standard, and together with the above deficiency, we recommend that the standard be remanded despite being a high risk standard.	Remand
MOD-016-0	Actual and Forecast Demands, Net Energy for Load, Controllable DSM	Lower	Unclear Enforceability	Remand
MOD-017-0	Aggregated Actual and Forecast Demands and Net Energy for Load	Lower		Remand
MOD-018-0	Reports of Actual and Forecast Demand Data	Lower		Remand
MOD-019-0	Forecasts of Interruptible Demands and DCLM Data	Lower		Remand

Appendix

NYSRC Evaluation of NERC Standards*

Standard Number	Title	Risk Violation Factor**	<u>Deficiencies Identified</u>	NYSRC Recommendation to Approve, Conditionally Accept, Remand, or Withdraw Standard
			Including: <ul style="list-style-type: none"> • Lacks Measures & Compliance Elements • Unclear Enforceability (“Fill-in-the-Blank” Standard) • Other Deficiencies and Comments 	
MOD-020-0	Providing Interruptible Demands and DCLM Data	Lower		Remand
MOD-021-0	Accounting Methodology for Effects of Controllable DSM in Forecasts	Lower		Remand
MOD-024-1	Verification of Generator Gross and Net Real Power Capability	Lower	Unclear Enforceability	Remand
MOD-025-1	Verification of Reactive Power Capability	Lower	Unclear Enforceability	Remand
PER-001-0	Operating Personnel Responsibility and Authority	High		Approve
PER-002-0	Operating Personnel Training	High	We agree with Staff that the standard does not specify minimum training requirements.	Conditionally Accept
PER-003-0	Operating Personnel Credentials	High	We agree with Staff concerns that the standard lacks an enforceability requirement.	Conditionally Accept
PER-004-0	Reliability Coordination – Staffing	High	Lacks Measures and Compliance Elements	Conditionally Accept
PRC-001-0	System Protection Coordination	High	Lacks Measures and Compliance Elements We do not agree with the Staff that related requirements covered in other standards must be repeated.	Conditionally Accept
PRC-002-0	Define and Document Disturbance Monitoring Equipment Requirements	High	Unclear Enforceability	Conditionally Accept
PRC-003-1	Regional Requirements for Transmission and Generation Protection System Misoperations	Lower	Unclear Enforceability	Remand
PRC-004-1	Analysis and Mitigation of Transmission and Generation Protection System Misoperations	High		Approve
PRC-005-1	Transmission and Generation Protection System Maintenance and Testing	High	We agree with Staff concerns and therefore we recommend that the standard should be conditionally accepted.	Conditionally Accept
PRC-006-0	Development and Documentation of Regional UFLS Programs	High	Unclear Enforceability We agree with Staff that the standard is not specific enough to address Blackout Report recommendations.	Conditionally Accept
PRC-007-0	Assuring Consistency with Regional UFLS Programs	High		Approve
PRC-008-0	Underfrequency Load Shedding Equipment Maintenance Programs	High	Agree with Staff concerns.	Conditionally Accept
PRC-009-0	UFLS Performance Following an Underfrequency	Medium		Approve

Appendix

NYSRC Evaluation of NERC Standards*

Standard Number	Title	Risk Violation Factor**	<u>Deficiencies Identified</u>	NYSRC Recommendation to Approve, Conditionally Accept, Remand, or Withdraw Standard
			Including: <ul style="list-style-type: none"> • Lacks Measures & Compliance Elements • Unclear Enforceability (“Fill-in-the-Blank” Standard) • Other Deficiencies and Comments 	
	Event			
PRC-010-0	Assessment of the Design and Effectiveness of UVLS Program	Medium	Agree with Staff concerns.	Conditionally Accept
PRC-011-0	UVLS System Maintenance and Testing	High	Agree with Staff concerns.	Conditionally Accept
PRC-012-0	Special Protection System Review Procedure	High	Unclear Enforceability	Conditionally Accept
PRC-013-0	Special Protection System Database	Lower	Unclear Enforceability	Remand
PRC-014-0	Special Protection System Assessment	Medium	Unclear Enforceability	Remand
PRC-015-0	Special Protection System Data and Documentation	Medium		Approve
PRC-016-0	Special Protection System Misoperations	High		Approve
PRC-017-0	Special Protection System Maintenance and Testing	High	Agree with Staff concerns.	Conditionally Accept
PRC-020-1	Under-Voltage Load Shedding Program Database	Medium	Unclear Enforceability	Remand
PRC-021-1	Under-Voltage Load Shedding Program Data	Medium		Approve
PRC-022-1	Under-Voltage Load Shedding Program Performance	Medium		Approve
TOP-001-0	Reliability Responsibilities and Authorities	High	Lacks Measures and Compliance Elements	Conditionally Accept
TOP-002-0	Normal Operations Planning	High	Lacks Measures and Compliance Elements	Conditionally Accept
TOP-003-0	Planned Outage Coordination	High	Lacks Measures and Compliance Elements Within NPCC, we believe that NPCC’s performance-based BPS definition would address Staff concerns.	Conditionally Accept
TOP-004-0	Transmission Operations	High	Lacks Measures and Compliance Elements The standard should be revised to add “as soon as practical, not to exceed 30 minutes”.	Conditionally Accept
TOP-005-1	Operational Reliability Information	High	We agree with Staff concerns and therefore the standard should be conditionally accepted.	Conditionally Accept
TOP-006-0	Monitoring System Conditions	High	Lacks Measures and Compliance Elements	Conditionally Accept
TOP-007-0	Reporting SOL and IROL Violations	High	Agree with Staff concerns.	Conditionally Accept
TOP-008-0	Response to Transmission Limit Violations	High	Lacks Measures and Compliance Elements	Conditionally Accept
TPL-001-0	System Performance Under Normal Conditions	High	See Footnote C.	Conditionally Accept
TPL-002-0	System Performance Following Loss of a Single BES Element	High	See Footnote C.	Conditionally Accept

Appendix

NYSRC Evaluation of NERC Standards*

Standard Number	Title	Risk Violation Factor**	<u>Deficiencies Identified</u> Including: <ul style="list-style-type: none"> • Lacks Measures & Compliance Elements • Unclear Enforceability (“Fill-in-the-Blank” Standard) • Other Deficiencies and Comments 	NYSRC Recommendation to Approve, Conditionally Accept, Remand, or Withdraw Standard
TPL-003-0	System Performance Following Loss of Two or More BES Elements	High	See Footnote C.	Conditionally Accept
TPL-004-0	System Performance Following Extreme BES Events	Medium	See Footnote C.	Conditionally Accept
TPL-005-0	Regional and Interregional Self-Assessment Reliability Reports	Medium	Unclear Enforceability We anticipate that RROs will develop regional transmission planning standards because of regional differences specific to their region, and therefore this standard should be withdrawn.	Withdraw
TPL-006-0	Assessment Data from Regional Reliability Organizations	Medium	Unclear Enforceability We anticipate that RROs will develop regional transmission planning standards because of regional differences specific to their region, and therefore this standard should be withdrawn	Withdraw
VAR-001-0	Voltage and Reactive Control	High	Lacks Measures and Compliance Elements	Conditionally Accept

* The NYSRC worked with the NPCC CP-9 Working Group in the preparation of this evaluation.

** These Violation Risk Factors are based on recommended Risk Factors for standard requirements that were submitted by the NYSRC to NERC on June 2, 2006. The Risk Factor shown for each standard represents the highest risk factor of all the requirements recommended for that standard, and is used in this evaluation to rank the relative importance of each standard to system reliability.

Footnote A: NERC has requested that the Commission defer action on this urgent action cyber security standard, pending filing of permanent replacement standards. Although not one of the 102 standards requested for approval, it is included in this Appendix for informational purposes. We agree with Staff’s concerns.

Footnote B: These communication standards are ambiguous on what constitutes adequate reliability. Because of this and other deficiencies identified in these standards we recommend that both standards be remanded, despite being high risk standards. If, however, these standards deal with SCADA data, then they should be conditionally approved.

Footnote C: NERC has established a Standards Authorization Request (“SAR”), “Assess Transmission Future Needs and Develop Transmission Plans,” for modifying these standards that may address Staff concerns.