

Comment Form — 2nd Posting of Reliability Coordination SAR

Please use this form to submit comments on the second draft of the Reliability Coordination SAR. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Reliability Coordination" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input 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
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

Background Information

The purpose of this SAR is to review a set of standards that includes reliability coordinator requirements with the intent of eliminating duplicate requirements and upgrading and reorganizing the requirements.

Based on stakeholder comments, the drafting team made several significant changes to the first draft of the SAR, including the following:

- Reduced the number of standards addressed in this project by eliminating consideration of standards that have not been approved, and standards expected to be retired as part of the IROL Implementation Plan.
- Revised the Descriptions to state more clearly the approach the standard drafting team will take in determining what action to take with each requirement in the set of standards. The drafting team will work with stakeholders to determine whether to:
 - o Modify the requirement to improve its quality
 - o Move the requirement (into another SAR or Standard or to the certification process or standards)
 - o Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).
- Revised the descriptions of the 'Reliability Functions' to reflect the latest version of the Functional Model (V3).

The SAR Drafting Team asks that you review the revised SAR and then answer the questions on the following page.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team reduced the scope of this SAR to eliminate review of standards that are still under development, including IRO-007-1 through IRO-010-1, and ORG-027-1. Do you agree with this modification? If not, please explain in the comment area.

Yes

No

Comments: We agree with excluding standards still under development.

2. The drafting team modified the SAR to be more exacting in describing the scope of changes proposed for the set of standards. The revised SAR clarifies that the Standard Drafting Team will work with stakeholders to determine what to do with each of the existing requirements:

- Modify the requirement to improve its quality
- Move the requirement (into another SAR or Standard or to the certification process or standards)
- Eliminate the requirement (either because it is redundant or because it doesn't support Bulk Electric System reliability).

Do you agree with this approach to reviewing the requirements? If not, please explain in the comment area.

Yes

No

Comments: We agree with improving the quality of the requirements, removing redundancies and those things that do not contribute to reliability. We do not see a listing of the drafting team members and it is unclear what stakeholders will be involved to improve these standards.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: The FERC NOPR should not be used to change the standards. Items in the final order should be considered.

Several of VO comments items are not clear. It would help if these fill comments were posted somewhere for reference.

We disagree with the assignment of Violation Severity Levels (VSL). VSLs should not be skewed to inflate the sanctions associated with a requirement. The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. The proposed breakdown in the SAR is not part of the Sanctions Guidelines and has not been vetted in the industry.

4. Several stakeholders indicated that the drafting team should remove the language in the original SAR that would have allowed the standard drafting team to add requirements to the standards if those additions were supported by stakeholders. The drafting team modified the SAR in support of those comments. The SAR drafting team thinks that additional SARs can be developed in the future to address any gaps in this set of requirements. Any new SARs generated by this effort would follow the normal standards development process. Do you support this approach?

Yes

No

Comments:

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

No additional comments

Comments: