

The Midwest Reliability Organization's NERC Standards Review Subcommittee (MRO NSRS) respectfully submits the below comments on CAN-0027:

Please note that VSLs do not line up with Requirements. R2 is listed under VSL: R3. Recommend that this issue be forwarded to the NERC Issues Database.

This CAN provides little needed guidance. The real issue is, what is the bright-line criteria of equipment that needs to be "planned and coordinated". The Purpose statement of this Standard uses the phrase, "outages that may affect the reliability of interconnected operations". Any attempt to address this brightline criteria falls outside the scope of the CAN process. Recommend that this issue be forwarded to the NERC Issues Database.