

Subject: IESO Comments on SARs due this Monday - 21st

RSSC Members,

Attached are the IESO comments on:

- 1) Generator Verification SAR (Standard Authorization Request); and
- 2) SAR for Permanent Changes to the Timing Table in the Coordinate Interchange Standards.

Details of the SARs can be obtained from the NERC message appended below. The IESO intends to file these comments with NERC on the 21st. Please review the attachments and let us know if you have any concerns or if you need additional information or clarification on the subject matter.

Sent: April 20, 2007 1:09 PM

Subject: ANNOUNCEMENT: Comment Periods Open

Maureen E. Long
Standards ProcessManager

April 20, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement: Comment Periods Open

The Standards Committee (SC) announces the following standards action:

SAR for Generator Verification (Project 2007-09) Posted for 30-day Comment Period April 20–May 21, 2007

The SAR for [Project 2007-09](#) proposes completing the following four Phase III & IV standards that have been field tested but require additional modifications beyond the scope of their original SAR:

1. ■ PRC-019 — Coordination of Generator Voltage Regulator Controls with Unit Capabilities and Protection
2. ■ PRC-024 — Generator Performance During Frequency and Voltage Excursions
3. ■ MOD-026 — Verification of Models and Data for Generator Excitation System Functions
4. ■ MOD-027 — Verification of Generator Unit Frequency Response

The SAR also involves revising the following two already-approved Phase III & IV standards:

- MOD-024 — Verification of Generator Gross and Net Real Power Capability
- MOD-025 — Verification of Generator Gross and Net Reactive Power Capability

The modifications will address issues raised by FERC and stakeholders about these standards, and will bring the standards into conformance with the ERO Sanctions Guidelines and the latest version of the Reliability Standards Development Procedure. Please use the [comment form](#) to provide comments on this SAR.

SAR for Permanent Changes to the Timing Table in the Coordinate Interchange Standards (Project 2007-14) Posted for 30-day Comment Period April 20–May 21, 2007

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR for [Permanent Changes to the Coordinate Interchange Table](#) proposes to make the above changes permanent and also proposes to add the following to the timing table to bring the timing table into alignment with the categories (On-time, Late, After-the-Fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an arranged interchange.

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact requests
- WECC pre-schedule late (Pre-late) submittal definition

Please use the [comment form](#) to provide comments on this SAR.

Standards Development Process

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or maureen.long@nerc.net.

Sincerely,

Maureen E. Long

cc: Registered Ballot Body Registered Users
Standards Mailing List
NERC Roster

Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "**Perm CI Table**" 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:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<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
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to bring the timing table into alignment with the categories (On-time, Late, After-the-fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to sarcomm@nerc.net with the subject "**Perm CI Table**" by **May 21, 2007**.

Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

You do not have to answer all questions.

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

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also bring the timing table into alignment with the categories (On-time, Late, After-the-Fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments: This is a SAR, not a draft standard. We don't think it is appropriate to ask a question on whether there is agreement on the content detail of the standard. We'll reserve our comment when the standard is drafted and posted for comment.

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments: Same comments as Q3

Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments: Same comments as Q3

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments: Same comments as Q3

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments: This appears to be posting draft revision to a standards rather than describing the scope of standard changes. A number of questions asked in this Comment Form appear to be inappropriate.

Comment Form — SAR for Generator Verification (Project 2007-09)

Please use this form to submit comments on the SAR for Generator Verification. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "**Generator Verification**" in the subject line. If you have questions, please contact David Taylor at david.taylor@nerc.net or by telephone at 609-651-5089.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
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 and ISOs
<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
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Generator Verification SAR calls for finalizing the last four Phase III & IV standards (subsequent to field testing) and calls for revising two of the Phase III & IV standards that were approved by the NERC Board of Trustees but not by FERC. All six standards need to conform to the latest version of the ERO Sanction Guidelines and Reliability Standards Development Procedure and all need to address FERC concerns identified in FERC Order 693. The standards associated with this SAR are:

- PRC-019 — Coordination of Generator Voltage Regulator Controls with Unit Capabilities and Protection
- PRC-024 — Generator Performance During Frequency and Voltage Excursions
- MOD-024 — Verification of Generator Gross and Net Real Power Capability
- MOD-025 — Verification of Generator Gross and Net Reactive Power Capability
- MOD-026 — Verification of Models and Data for Generator Excitation System Functions
- MOD-027 — Verification of Generator Unit Frequency Response

The SAR drafting team would like to receive comments on this SAR. Please review the SAR, answer the questions on the following pages, and e-mail the form to sarcomm@nerc.net with the subject "**Generator Verification**" by **May 21, 2007**.

You do not have to answer all questions.

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

1. The field test from the Phase III & IV project included PRC-019, PRC-024, MOD-026, and MOD-027. The field testing has shown that requirements can be developed and incorporated into standards for the following:

- Generator excitation system verification (MOD-026)
- Generator frequency response verification (MOD-027)
- Expectations for generators to remain connected during specified voltage and frequency excursions (PRC-024)
- Coordination of generator voltage regulator controls and limit functions with generator capabilities and protective relays (PRC-019)

Finalizing these standards will require significant changes that are outside the scope of the original Phase III & IV SARs, which is why the draft standards have been included in the scope of this new SAR. Do you agree that there is a reliability-related need to finalize these standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Two of the standards (MOD-024 and MOD-025) associated with this SAR had already been approved by the NERC Board of Trustees, but are "pending" with FERC because they include "fill-in-the-blank" requirements assigned to the Regional Reliability Organization. These standards must be revised to remove the fill-in-the-blank characteristics before they can become mandatory and enforceable. The intent of MOD-024 and MOD-025 is to ensure that accurate information on generator gross and net real and reactive power capability is available for the steady-state models used to assess bulk electric system reliability.

To be enforceable, these standards need to be revised. Do you agree that there is a reliability-related need to revise these standards to support accurate modeling?

Yes

No

Comments:

3. The scope of this project includes:

- Modifying the six standards associated with this project so they conform to the latest version of NERC's Reliability Standards Development Procedure and the ERO Sanction Guidelines,
- Replacing the fill-in-the-blank requirements assigned to the Regional Reliability Organization with requirements that can be applied on a continent-wide basis and are assigned to users, owners, or operators of the bulk power system, and
- Addressing issues identified in FERC Order 693.

Comment Form — SAR for Generator Verification (Project 2007-09)

Do you agree with this scope? If not, please explain in the comment area.

Yes

No

Comments: The SDT should consider the term characteristics during the review of the standards. The following is an example of:

-PRC-019-1

R2.1.2 & R2.1.5 - How to define characteristics? A common interpretation could be to define characteristics as the "setpoints" for the controllers. However, this does not appear to be the case as in other requirements they request "setpoints" as is shown in R2.1.6. MOD-026-1 appears to address this but refers to the excitation system functions.

In other words, the terms "characteristics" and "setpoints/settings" are presented in the requirements without clearly clarifying the meaning of the terms. "Characteristic" could mean something like a Generator capability curve (or any operating curve for that matter or nomograms) where the operations are defined by a "bounded region of operation" as such and is kind of "analog" in nature. "Setpoint/Setting" on the other hand could be something like a Generator Under-frequency trip setting where there are "set-points" for tripping – kind of "digital" in nature. Is this what the SDT means by these terms. Please clarify.

As the standards are reviewed, there are specific questions that need to be addressed such as:

MOD-025-1

R1.5.3 - Is this individual loads, or is this an overall value for the total auxiliary loads running at full station output?

Also, What will define the need to revisit this when equipment changes occur?

In addition, the SDT should consider additional field tests for all the changes associated with the revised standard.

4. Page 6 of the SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. (At this point additional industry debate is needed on which function or functions will be assigned responsibility for the requirements currently assigned to the RRO — and that debate is expected to take place during standard drafting as the requirements are refined. Note that the standard drafting team can "reduce" but cannot "expand" this list of responsible reliability functions during standard drafting.) Do you agree with the list of proposed applicable functional entities? If you feel that the list should be modified, please explain in the comment area.

Yes

No

Comment Form — SAR for Generator Verification (Project 2007-09)

Comments: We agree that the list covers all the reliability functions that are listed in the existing standards. However, in view of the expected industry debate on this issue, it may be prudent to add Generator Operator to the list in the event that any of the six standards should be revised to hold Generator Operators responsible for any tasks.

5. If you are aware of any regional variances that will be needed as a result of this project, please identify the Regional Variance:

Regional Variance:

Comments:

6. If you are aware of any business practice that will be needed or that will need to be modified as a result of this project, please identify the business practice:

Business Practice:

Comments:

7. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Comments: