

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Please use this form to submit comments on the proposed SAR for Disturbance Monitoring. Comments must be submitted by **April 20, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "DME SAR" in the subject line. If you have questions please contact **David Taylor** at David.Taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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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

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Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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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. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments: