

Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

This form is to be used to submit comments on the proposed *Provide Missing Measures and Compliance Elements in Existing Standards* Standard Authorization Request. Comments must be submitted by **June 8, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “V0 Compliance Elements: SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- DO:**
- Do enter text only, with no formatting or styles added.
 - Do use punctuation and capitalization as needed (except quotations).
 - Do use more than one form if responses do not fit in the spaces provided.
 - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
 - Do not use numbering or bullets in any data field.
 - Do not use quotation marks in any data field.
 - Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti / Khaqan Khan
Organization:	Independent Electricity system Operator (IESO), Ontario
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Email:	Ron. Falsetti@ieso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

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Background Information:

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

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Question 1: Do you agree there is a reliability need to address missing and deficient elements in the Version 0 Reliability Standards?

Yes

No

Please provide any additional comments:

We agree with the need to prioritize and address missing and deficient compliance elements, measures and levels of non-compliance from the existing Version 0 Reliability standards. It is our position however, other issues with these standards be addressed in the Version 1 standards being developed.

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Question 2: Do you agree with the scope of the proposed modifications?

Yes

No

Please provide any explanation below:

We agree with the scope of the SAR however the title is misleading. The current title tends to allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements. Perhaps even open a full review of the identified Version 0 Standards. The title should therefore be revised to address our concern.

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Question 3: Do you believe there are additional standards that require compliance or measurement information that were not included in the scope of this SAR?

Yes

No

Please provide any explanation below:

There are several other standards (including BAL-003-0 to BAL-006-0 and EOP-005-0) that are missing either one or both the Measures and/or Compliance elements. We suggest that NERC SDT should review these standards to assess whether their inclusion is required in this SAR.

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Question 4: Do you agree with proposed work schedule prioritizing the standards identified in the SAR?

Yes

No

Please provide any explanation or suggested modifications below:

1). We suggest standards COM-001-0 and COM-002-0 be moved from the Stage 3 category and be added/included in priority stage 1 category (re: pertaining to revision in 2005 and its implementation in 2006). These COM-standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved to priority/stage 1 category.

2). Some of the standards mentioned under the staged priority listing already include compliance measures and non-compliance levels (such as: EOP-002-0, IRO-001-0). It needs to be clarified whether the intention for including such standards is to revise the existing compliance measures and/or levels. We suggest that priority should be given to those standards that do-not have any compliance measures/levels at all, unless there is a critical reliability related need for revision in already existing compliance measures.

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Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?

Yes

No

If yes, please share those comments in the space provided below.

Although there is value in this SAR with respect to identifying the schedule and priority, we are of the opinion there should be a separate SAR for each standard that outlines what will be done, frame the Drafting Team's work appropriately and ensure coordination with Version 1 for each.