

Comment Form for Draft 1 of Nuclear Power Plant Off-site Power Coordination Standard

Please use this form to submit comments on Draft 1 of the Nuclear Power Plant Off-site Power Coordination standard. Comments must be submitted by **January 17, 2006**. You must submit the completed form by e-mailing it to sarcomm@nerc.com with the words “Nuclear Off-site Power Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609-452-8060.

All Data On This Form Will Be Transferred Automatically To A Database.

- 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	
Organization:	Independent Electricity System Operator, Ontario	
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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"/> 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"/> MRO	<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"/>	
<input type="checkbox"/> NA — Not Applicable	<input type="checkbox"/>	

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Please Enter All Comments in Simple Text Format.

1. Does your company own or operate a nuclear power plant?

Yes

No

2. Does your company provide off-site power supply, transmission, or other services to a nuclear power plant?

Yes

No

3. If the standard was presented for approval as written, would you be inclined to:

Approve the standard

Not approve the standard

Abstain or don't know

Please provide reasons:

The IESO congratulates the Standards Drafting Team for their work in the development of this standard, and is in full support of it.

4. Are there any 'show-stoppers' that would prevent you from approving the standard?

Yes

No

If yes, please list them:

5. If the standard is adopted by the NERC board in May 2006, do you believe July 1, 2007 is an appropriate effective date by which all applicable entities can comply with the standard?

Yes

No

If no, please comment and state an alternative effective date that would be acceptable.

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6. Considering the effective date by which applicable entities must comply with the standard, is there a need to field test the standard?

Yes

No

If yes, please state your reasons why field testing is required and describe the nature of the field test you would propose.

7. Do you have any additional comments on the proposed standard? If so, please provide your comments and any specific changes you would recommend to improve the standard.

The second sentence of the Purpose seems to imply the standard is only applicable to entities other than Nuclear Plant Entities. We suggest it be rephrased to eliminate this unintended exclusion.

NERC's reference to "Transmission Entities" is overbroad; and fails to specifically identify which entity, the Transmission Owner, the Transmission Operator an Independent System Operator/Regional Transmission Organization, or some combination of the above as the responsible entity. Without specifying who is responsible for what, there is an inability to fairly enforce the standard.

The definition for Transmission Entities and in Section A 4.2, includes the term "Planning Authorities" twice. One should be deleted. We also recommend that the definition in Section A 4.1 & A 4.2 be deleted since they appear under Definition of Terms.

Requirement R3 is redundant. It is covered by requirement R8.1.6.

In general, many of the measures are written more like requirements. Measures should be phrased such that they provide evidence for meeting the requirements.