

Comment Form – Proposed Reliability Coordinator Certification Standards

This form is to be used to submit comments on the proposed Draft 1 of the Reliability Coordinator Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “RC Certification Standards 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.)	
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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:

The Standard Drafting Team developed the RC Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

RC SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Reliability.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmode.html>

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to sarcomm@nerc.com with the subject "RC Certification Standards Comments" by **July 1, 2005**.

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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-020-1 — Reliability Coordinator Certification — Certification?

Yes

No

Comments: It is not clear from the standard whether this is a one-time requirement (initial certification) or whether this is the start of some repetitive requirement. The standard should be clear that this is for initial certification and that the RC standards in force at any given time would guide the ongoing requirements. If this is a one-time requirement, the standard should say so.

Requirements 1 and 5 are redundant. R5 needs to be deleted.

The RROs should probably retain the underlying documentation collected during the certification for a period of time.

Finally, there should be wording either in the standard (or in the process document that defines the requirements) that an RC that operates in multiple Regions be evaluated once by all applicable Regions.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-021-1 — Reliability Coordinator Certification — Agreements?

Yes

No

Comments: If the term agreement includes documents such as market rules, policies, procedures or tariffs, then we agree with the requirements. If the term agreement means signed separate documents with every entity on every requirement, we would disagree. Primary "agreements" (as per above) should apply to the TOPs and BAs within the RC area. In general, they have the ability to provide the RC with needed data.

Also, there is a requirement to process daily integrated operational plans (which is in the functional model, but not in the standards). While the items in the functional model are useful to verify the RC has the processes needed to do the job, the functional model tasks shouldn't form a go-no go situation (as long as the general intent is met).

Requirements R1.1 and R2.1 require the RC to "train" their operators and ensure they "understand" their obligations and responsibilities. The use of the word "understand" is too subjective. If the intent is to "test" operators to ensure they understand the requirement, it should say that.

With regards to the ability of the RC to direct those under its footprint. The terms used in R3.2.6, R3.3.4, and R3.4.4 are inconsistent. We need to suggest a consistent application of an RC's direction.

Requirement R3.2.6 requires the BA to "comply with RC directives under both normal and emergency conditions.

Requirement R3.3.4 requires the TOP to "implement corrective actions directed by the RC"

Requirement R3.4.3 requires the TSP to "follow the direction of the RC"

All three requirements should be worded the same and we recommend the wording used in R3.2.6 for the BA. Also, does the RC issue directives to the TSP?

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-022-1 — Reliability Coordinator Certification — Personnel?

Yes

No

Comments:

Requirement 2 requires the RC to provide its operating personnel with training. This is too vague. A minimum amount and type of training needs to be identified.

The task outlined in R1.1 should accurately reflect the RC tasks outlined in the Functional Model

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-023-1 — Reliability Coordinator Certification — Data Acquisition and Monitoring?

Yes

No

Comments:

There should be wording about the RC's obligation to monitor for IROLs.

Purpose - Strike the word "and" after generation.

Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.

Requirement R2.1 - R2.4 need to indicate if this is for "all" generators or generators "above a certain MW value".

R2.10 needs to indicate ACE "from all BA's with the RC Area"

R2.14 - Add the word Schedules after Interchange.

R4 - An RC may need reliability analysis information from RC's that are not "adjacent" to them.

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5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-024-1 — Reliability Coordinator Certification — System Analysis?

Yes

No

Comments:

Requirement R1 should say "Interconnection Reliability Operating Limits (IROL) " instead of "operating reliability limits".

We would suggest inserting the word "analyze" prior to "coordinate and direct actions..." in R4.

Regarding M1, the RCs should be able to demonstrate the ability to use the tools.

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-025-1 — Reliability Coordinator Certification — Emergency Operations?

Yes

No

Comments:

Requirement R1.3 is unclear. Do regulatory organizations impose emergency requirements on an RC?

Requirement R2.1 - Replace "corrective actions" with "directives to take corrective action"

Add Measure 1 requiring the RC to demonstrate they have all of the procedures or processes required in Requirements R1 and R2.

Change existing Measure 1 to Measure 2.

M1 doesn't specifically match with R1 and R2 concerning the use of tools.

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-026-1 — Reliability Coordinator Certification — Loss of Control Center Functionality?

Yes

No

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Comments: Requirement 1 needs to state an expected time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without an expected time an RC could be compliant even if it took 24 hours.

If the RC's primary facility becomes unavailable the RC's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a back up center, a shared backup center, contracting with another entity, etc. The plan for continued operation should require identifying the RC's physical plan for a back up control center.

The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. This requirement needs to be mapped into this proposed ver-1 standard.

re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.

With regards to R-2.3, the requirement to acquire construction plans, it would be better phrased as "outage plans".

Requirement R2.4 - Replace "interchange information" with "interchange schedules".

8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for Standard ORG-027-1 — Reliability Coordinator Certification — Restoration?

Yes

No

Comments: The SDT should consider adding a minimum list of items that need to be included in the RC restoration plan.

According to the Reliability Standard EOP-005-0, only TOPs have restoration plans so it is inconsistent to require RCs to have a plan that includes the plans of BAs and GOs. We don't disagree with the intent of this standard but this inconsistency needs to be fixed.

We recommend to delete "integrates the restoration plan" from the R1 and suggest that R1 be reworded as follows:

"The Reliability Coordinator shall have a restoration plan that assures effective restoration within and adjacent to their Reliability Coordinator Area by enabling, and coordinating required operating actions

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necessary for system restoration of all the entities operating within its Reliability Coordinator Area including its Balancing Authorities, Generator Operators, Transmission Operators, Load Serving Entities and adjacent Reliability Coordinators.”

Rationale:

There may not be mechanisms to integrate the restoration plans of adjacent reliability coordinators. Rather actions are coordinated for effective restoration and capture obligations in Interconnection agreement and their underlying joint operating procedure

9. Please identify any elements that you feel that should be included in the standards, but are not.

Comments: (i)- We have a general concern with regard to the existing NERC Registration Process and the ultimate RC Certification Process. The concern regards the consistency, terminology or the various interpretations within the industry of what constitutes an RC. We believe that clarity shall be established prior to ultimate certification. Our understanding is that various issues are under consideration at the Functional Model Working Group and we would ask that guidelines be developed and included in the revised Functional Model and be included in the implementation plan for the RC Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean a contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.

(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.

(iv)- Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified.

10. Please identify any regional differences that you feel should be included in the standards.

Comments: