



November 22, 2004
Mr. Gerry W. Cauley
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North American Electric Reliability Council
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IMO Comments on Errors or Omissions: Draft 3 Version 0 Reliability Standards

Dear Mr. Cauley:

Attached are the errors/omissions that we observed.

Comments on draft 3-V0-Operating Standards

Standard EOP-008-0 (draft 2 standard # 28) -Plans for Loss of Control Center Functionality

Although “NERC response document” mentions that our previous concern requiring correction in non-compliance levels has been addressed yet the levels of non-compliance are still incorrectly mapped from P6T2 (overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). These levels of non-compliance in std EOP-008-0 should be corrected by mapping it from the original template P6T3.

Standard INT-001-0 (draft 2 # standard 010) - Interchange Transaction Tagging

The original template P3T3 includes non-compliance levels i.e. L1 to L4. These levels of non-compliance from original template P3T3 have not been mapped/translated into this standard INT-001-0. Is it intentional or an error?

Standard TOP-005-0 (draft 2 # std 015) “Operational Reliability Information”

Although “NERC response document” mentions that our previous concern requiring clarity on responsible entity and requesting entity have been addressed in non-compliance levels, yet these still appear in L1/L4 levels of non-compliance.

The unclear terminology Responsible Entity (re: L1 & L4) and Requesting Entity (re: L1, L4 & M1) need to be clearly outlined/qualified.

Standard TOP-003-0 (draft 2 # std 016) “Planned Outage Coordination

The unclear terminology Responsible Entity (re: D1, L1 & L4) need to be clearly outlined/qualified.

Comments on draft 3-V0 Planning Standards

PRC-007-0 (draft 2 standard # 67.2) “Assuring consistency.....”

New references to include: “Load Serving Entities” has been added in Section A4.4, Section B R2 and Section C M2. It was not in previous draft 2 version and is not marked as red changes in draft 3. Has the addition of Load Serving Entity intentionally included in draft 3 of version 0.

Standard MOD-008-0 (draft 2 standard # 56.1) “Documentation and Content....”

Although “NERC response document” mentions that our previous concern regarding ‘transmission users’ has been addressed yet this still appears in these standards (re: R2 & M1). This needs to be changed to ‘Transmission Service Providers’ and Transmission Owners”.

Standard MOD-009-0 (draft 2 standard # 56.2) “Procedure for verifying....”

The terminology ‘transmission users’ should be defined/qualified.

Standard MOD-016-0 (draft 2 standard # 61.1) “Actual and forecast Demands....”

Although “NERC response document” mentions that our previous concern regarding standard Level 4 re: MOD-016-0 (draft 2 # std 61.1) has been addressed yet this remains an omission.

Correct wording is as follows:

Under “Level 4 of non-compliance”, the last sentence should read as “.....and the reporting procedures as required in Reliability standard MOD-016-0 R1.1.”

Yours truly,

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