

Comment Form Third Posting of the Draft Reliability Coordinator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: sarcomm@nerc.com with the words "Proposed Revisions to Reliability Coordinator Certification Standards" 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. 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"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<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

Background Information:

- To understand the Standard Drafting Team's philosophy used to create the standard, refer to the Reliability Authority Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:
ftp://www.nerc.com/pub/sys/all_updl/standards/sar/RA_CERTIFICATION_01_04.pdf
<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the Certification Drafting team has referenced applicable Version 0 standards. Specific Version 0 Standard requirements have not been included to allow for future modifications. A reference document is being developed by the Certification Standard Drafting Team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
- Also in the posting, Field Testing of the standards has been added to the timeline and development process.

Standard – ORG-020-1 – Reliability Coordinator Certification – Certification

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Certification standard?

Yes

No

Comments: *Specific to R4, It is the IESO's view a Reliability Coordinator should have procedures, processes and tools in place for adhering to **all** NERC reliability standards. By singling out the need to adhere to Cyber Security begs the question on the need to adhere to other reliability requirements.*

Standard – ORG-021-1 – Reliability Coordinator Certification – Agreements

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Agreements standard?

Yes

No

Comments:

- (i) *In R3, the added sentence " **The entities identified below are the typical information sources, however the information identified can be obtained from alternative sources and must be identified in the appropriate agreements.**" is confusing. Does it mean that the data identified can be (a) obtained from the sources listed in R3.1 to R3.8, below, or other alternative sources, and (b) the data must be clearly specified in the agreements with these listed sources and the other alternative sources where the data is obtained? Please clarify.*

The IESO interprets that R3.1 to R3.8 list the elements that must be included in the agreements between the RC and its counterparts to clearly define responsibilities and authorities. Some of these elements contain data provision requirements but some do not. The added sentence noted above therefore seems to be a little out of place and creates more confusion than it's intended to serve.

If the intent is to indicate that the data can be obtained from alternative sources and that similar agreements must be established between the TOP and the alternative sources, then we'd suggest that this intent be stipulated after R3.8.

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- (ii) *Alternatively, we recommend that the structure used for the **BA Certification - Agreements** standard be considered for use in the Certification - Agreements standard. Please see our comments on the BA Certification Standards..*

Standard – ORG-022-1 – Reliability Coordinator Certification – Personnel

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Personnel standard?

Yes

No

Comments:

Standard – ORG-023-1 – Reliability Coordinator Certification – Data Acquisition and Monitoring

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Data Acquisition and Monitoring standard?

Yes

No

Comments: *A Reliability Coordinator should monitor conditions in other Reliability Coordinator Areas as opposed to monitoring other Reliability Coordinators as stipulated in R8. We suggest R8 be revised to “.....monitoring other Reliability Coordinator Areas as identified in IRO-003...”*

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Standard – ORG-024-1 – Reliability Coordinator Certification – System Analysis

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – System Analysis standard?

Yes

No

Comments:

Standard – ORG-025-1 – Reliability Coordinator Certification – Emergency Operations

Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Emergency Operations standard?

Yes

No

Comments:

Standard – ORG-026-1 – Reliability Coordinator Certification – Loss of Control Center Functionality

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Loss of Control Center Functionality standard?

Yes

No

Comments:

Standard – ORG-027-1 – Reliability Coordinator Certification – Restoration

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Restoration standard?

Yes

No

Comments:

8. Please identify any elements that should be included in the standards that have not been identified?

Comments:

9. Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

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10. The Drafting Team believes that the RC Certification standards are ready for ballot. Do you support this position?

Yes

No

Comments: *Once our above comments are addressed then we would consider these ready for balloting.*