

Individual or group. (32 Responses)

Name (19 Responses)

Organization (19 Responses)

Group Name (13 Responses)

Lead Contact (13 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)

Comments (32 Responses)

Question 1 (31 Responses)

Question 1 Comments (32 Responses)

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| Group |
| Northeast Power Coordinating Council |
| Guy Zito |
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| Yes |
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| Individual |
| Thomas Foltz |
| American Electric Power |
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| No |
| After further review, AEP now believes that R2 is too open-ended in both data requested and potential format, especially given that only 30 days is being afforded to provide that data. MOD-032-1 added the text "unless a longer time period is agreed upon" to allow flexibility, and we believe similar verbiage should be added to MOD-033-1 as well. AEP disagrees with the response given by the team in its consideration of comments where it states that providing the data would not be unduly burdensome as it "only requires the TOP to provide any real time data that it has for a specific event or disturbance...". As written, the requirement provide no bounds on what data could be requested, nor in what format. As a result, some requests could conceivably be quite burdensome and/or too difficult to provide within thirty days. The recommended text would provide the flexibility necessary for both parties to agree on the amount of time needed to provide the data. In addition, AEP believes that performing comparisons every 24 months is unnecessarily excessive, and instead recommends the period be established as 60 months. Due to the concerns provided, and after further consideration, AEP has decided to vote negative on this proposed standard. |
| Individual |
| Lance Bean |
| Consumers Energy Company |

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| No |
| The measurement R1 does not provide enough guidance. Here are some quotes from R1 that demonstrate what I mean 'does not prescribe a specific method or procedure for the validation', 'the outcome is left to the judgment of the Planning Coordinator' , 'entities are encouraged to perform the comparison on a more frequent basis', the Planning Coordinator may consider among the other criteria' ' may include comparisons of'. In summary, MOD-0330-1 as written is too vague. For this reason, the Consumers Energy ballot body is voting negative on MOD-033-1. |
| Individual |
| John |
| Falsey |
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| Yes |
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| Individual |
| Michael Falvo |
| Independent Electricity System Operator |
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| Yes |
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| Individual |
| David Jendras |
| Ameren |
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| Yes |
| We believe that this clarification should address concerns regarding the impossibility of collecting data and completing an analysis for a dynamic local event occurring in month 23 since the previous dynamic local event. |
| Individual |
| Brett Holland |
| Kansas City Power & Light |
| |
| No |
| Although I appreciate the drafting team's attempt at clarification of the standard, I believe that further modifications are necessary. First, I question why the clarification was inserted in parentheses and the placement of the clarification in general. Also, I have additional concerns regarding the following situation: Dynamic local event A occurs and the Planning Coordinator, according to R1.2, initiates the comparison of the model to actual system response. Dynamic |

local event B occurs the following month. There are no additional dynamic local events in the following 23 months. In this situation, the comparisons would have to be almost concurrent, forcing the Planning Coordinator to do twice as many comparison as otherwise required. Also, if the Planning Coordinator decided to wait to see if another event occurred within the 24 month period after event A, there would only be one month remaining in the 24 month period to complete the comparison. In order to prevent the Planning Coordinator from having to perform concurrent comparison, I would suggest inserting a minimum along with the maximum time between events.

Individual

Joe O'Brien

NIPSCO

No

We think that for comparisons 24 months is too frequent; 5 years would be adequate.

Individual

Kathleen Goodman

ISO New England Inc.

No

The change does not clarify other aspects of this requirement. For example, this draft does not define "dynamic local event." Also, the Purpose refers to "the interconnected transmission system" but R1 refers to "local event" so these differences should be clarified. Here are some suggested changes to this draft that might address these issues: Purpose: To establish consistent validation requirements to facilitate the collection of accurate data and building of planning models to analyze the reliability of that portion of the interconnected transmission system for which the Planning Authority, Planning Coordinator, Reliability Coordinator, or Transmission Operator is responsible. Define "dynamic local event" as "dynamic local event as determined by the the Planning Authority, Planning Coordinator, Reliability Coordinator, or Transmission Operator"

Individual

Alice Ireland

Xcel Energy

Yes

Individual

Laurie Williams

PNM -Public Service Company of New Mexico

No

PNM appreciates the SDT's efforts to clarify R1.2 since the last version of the standard. As a registered PA/PC, PNM is still unclear on how to determine compliance with the requirement to perform an assessment every 24 months unless "no dynamic local event" occurs. The way the standard is worded appears to suggest that an entity could be compliant with the Standard as long as when a local event occurs, it is used to validate the models within 24 months of the event's occurrence. As an auditor, the last sentence in R1.2 seems to nullify, in the circumstance where no local event occurs, the requirement to perform at least one validation every 24 months. If the intent of the Standard is to only require a validation of dynamic local events within 24 months of their occurrence, PNM suggests removing the once every 24 month aspect of the requirement or alternatively, establishing a maximum amount of time that can occur between validations. For the latter, PNM submits the following modification to R1.2 for the SDT's consideration: 1.2. Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning dynamic model to actual system response, through simulation of a dynamic local event at least once every 24 calendar months ...[delete text from original R1.2]... There shall be no more than [5?] calendar years between performance of validations performed pursuant to R1.2. PNM does not have a preference as to how frequently the validations must be performed, but sees a reliability need to ensure they are performed on some regular basis. The current R1.2 language may be too vague to ensure consistent enforcement among auditors and Regions. PNM agrees with the SDT's approach that 'dynamic local event' should not be a defined NERC term as defining this might put the Auditor in the position of having to somehow verify dynamic local events which would be burdensome without a corresponding improvement to BES reliability. However, it seems unlikely that a PA/PC would not experience an event at least once every 24 months given the brief guideline in the Standard which states, "a dynamic local event is a disturbance of the power system that produces some measureable transient response..."

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| Group |
| Arizona Public Service |
| Janet Smith |
| No |
| We propose the following redline to the standard in order to make the intent of the Standard clear. 1.2. Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning dynamic model to actual system response, through simulation of a dynamic local event, at least once every 24 calendar months (Use a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison and complete each comparison within 24 calendar months of the dynamic local event). If no dynamic local event occurs within the 24 calendar months, use the next dynamic local event that occurs in the future, then perform a comparison within 24 months of that event. |
| Individual |
| Shirley Mayadewi |
| Manitoba Hydro |

Yes

Although Manitoba Hydro is in general agreement with the standard, we have the following comments: (1) R1 – this part actually incorporates two actions 1) that the Planning Coordinator document a data validation process and 2) that the Planning Coordinator implement such documented process. As written, they are intertwined. (2) R1, 1.2 – punctuation is missing before the bracketed sentence. It might read better to delete the brackets and delete the word 'Use' and replace with 'using' to make the bracketed sentence part of the comparison requirement rather than a separate instruction. (3) R1, 1.4 – the words 'the Planning Coordinator will use' should be inserted after 'Guidelines'. (4) M2 – notification should more appropriately be 'a written request' to be consistent with the requirement language. (5) Compliance 1.3 – a change was made to this language but it did not address our original concern. The language still refers specifically to a process found in the NERC Rules of Procedure. Manitoba Hydro has only adopted certain portions of the NERC Rules of Procedure. The typical language found in standards in this section (that just lists possible processes) is preferable for consistency with the other standards.

Group

Bonneville Power Administration

Andrea Jessup

Yes

Individual

Andrew Z. Pusztai

American Transmission Company

Yes

Group

FirstEnergy

Doug Hohlbaugh

Yes

FirstEnergy (FE) agrees that the change made by the SDT provides additional clarity as to when the validation required by the standard must be completed by the Planning Coordinator. FE's Negative ballot position is based on our prior draft comments that remain concerns. Specifically, the standard is heavily dependent on the "documented data validation process" written by the PC. The standard is generally very vague and generic and provides very limited particulars and/or specifics. We support the validation effort, however, it should be limited to near-term (year one) models since longer term models may differ greatly in modeling assumptions such as load, generation dispatch and interchange flows.

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| Group |
| SPP Standards Review Group |
| Shannon V. Mickens |
| Yes |
| We suggest deleting the phrase "..., and M1 through M2,..." as shown in the second paragraph of R1.2 in the Compliance Section. As written this sentence implies that the applicable entity must be compliant with the Measures of the Requirments. That is not the case. Applicable entities are required to demonstrate compliance with the Requirements. The Measures provide examples of what types of evidence can be used to show compliance with the requirements. In the second line in the second paragraph in the Rationale Box for R2, insert an "a" between "at" and "generator". In the first bullet at the bottom of Page 13 in the Guidelines and Technical Basis section, delete the "s" on "Voltages". |
| Individual |
| Don Idzior |
| Consumers Energy Company |
| No |
| MOD-33-1 is a standard that requires a data validation process. The measurement R1 does not provide enough guidance. Here are some quotes from R1 that start on page 13 of Model_Validation_REDLINE_2013_1205.pdf that demonstrate what I mean "does not prescribe a specific method", "entities are encouraged to perform the comparison on a more frequent basis", "the Planning Coordinator may consider among the other criteria", "may include simulations of". MOD-033-1 is too vague as written. |
| Individual |
| Anthony Jablonski |
| ReliabilityFirst |
| No |
| ReliabilityFirst has concerns over the new parenthetical language added to Requirement R1, Part 1.2 and requests the rationale for these additions. Specifically ReliabilityFirst has concerns with the 24 month periodicity in which a comparison needs to be completed. ReliabilityFirst believes the comparison should be completed as soon as possible (but not more than six months) following a dynamic local event. ReliabilityFirst also believes Requirement R1, Part 1.2 should be split up (thus creating a new Part 1.3) and deleting the last sentence regarding no dynamic local event occurring. With the description of the "dynamic local event" contained in the background portion of the standard, there should always be at least one event the Planning Coordinator may choose that may be validated within the two-year period. ReliabilityFirst offers the following for consideration: 1.2 Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning dynamic model to actual system response, through simulation of a dynamic local |

event, at least once every 24 calendar months (Use a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison). 1.3 Comparison shall be completed within six calendar months of the dynamic local event.

Group

Duke energy

Michael Lowman

No

Duke Energy suggests revising the parenthetical in R1.2 to read as follows “(Use a dynamic local event that occurs 24 calendar month and complete that comparison within 24 calendar months of the dynamic local event).” This allows the PC the flexibility to choose which dynamic local event to use during the 24 month period if multiple dynamic local events occur in that 24 month period.

Group

Dominion

Connie Lowe

Yes

Group

JEA

Tom McElhinney

No

In support of our negative vote, we would like to maintain our comments from our last vote.

Individual

Eric Bakie

Idaho Power Company

Yes

Individual

Scott Langston

City of Tallahassee

Yes

Individual

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| Karen Webb |
| City of Tallahassee - Electric Utility |
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| No |
| R1.2 –The standard should provide guidance as to the scope of an acceptable event and parameter better defining the term local. R1.3 The language does not provide for consistency across differing PCs in a geographic region (see comment R1.2) 1.4 – The language does not provide for consistency across differing PCs in a geographic region (see comment R1.2) |
| Group |
| Florida Municipal Power Agency |
| Frank Gaffney |
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| Our comments from the last posting were not addressed. Please see FMPA’s comments posted on November 20, 2013. |
| Group |
| North American Generator Forum - Standards Review Team (NAGF-SRT) |
| Allen Schriver |
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| Yes |
| Although the NAGF-SRT agrees with the clarification, the NAGF-SRT submits that the 24 month timeframe is too frequent and should be extended to 5 - 10 years. |
| Group |
| ACES Standards Collaborators |
| Ben Engelby |
| |
| No |
| (1) Model validation is a good topic for a technical guideline document. We recommend that the drafting team consider other alternatives to developing a standard and work with the NERC Planning Committee to issue a guideline in lieu of a standard. The drafting team also concedes that “validation of model data is a good utility practice, but it does not easily lend itself to Reliability Standards requirement language. Furthermore, it is challenging to determine specifications for thresholds of disturbances that should be validated and how they are determined.” If this persists as a standard, we recommend that the drafting team provide some sort of threshold of disturbances and technical justification. There is too much ambiguity in the current language of the requirement. (2) For Requirement R1, Parts 1.1 and 1.2, what is the technical justification for performing simulations once every 24 months? Without technical justification for the 24 months, this timeline appears to be arbitrary. We continue to ask the drafting team to provide a rationale. (3) The new parenthetical is R1, part 1.3 “(Use a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison and complete each comparison within 24 calendar months of |

the dynamic local event)’ is confusing. We recommend revising the language for clarity. (4) For Requirement R1, Part 1.3 needs to be modified to remove the clause “unacceptable differences in performance” because this language is ambiguous. The compliance guidance states that an entity will be required to include documented guidelines to determine whether the differences are unacceptable. These guidelines are subjective and open to multiple interpretations as to what unacceptable differences in performance actually are and there could be inconsistent application during an audit. (5) For Requirement R2, this requirement meets Paragraph 81 criteria because it is administrative, focuses on data collection activities, and requires periodic updates that do not directly support reliability. Furthermore, we cannot fathom a situation in which an RC or TOP would refuse to provide data to their associated PC for the purposes of improving their modeling. This is particularly true given that almost all PCs are also registered as RCs and TOPs. Today the NERC registry shows there are 81 registered PCs. Of these 81, only 4 are not also registered as a TOP or RC. All four of these are part of a larger system in which models are developed primarily by larger. For example, three are located in Georgia and are part of the Georgia Integrated Transmission System that is jointly planned. The last remaining one is part of a joint action agency in Florida which is usually integrated into larger system. The bottom line is that this requirement is further obviated by the fact the PCs can get the necessary modeling information internally. We continue to request that the drafting team reference the P81 criteria and provide rationale why the requirement should remain in the standard. After our review of the criteria, we have determined that the requirement be struck in its entirety. (6) In regard to the statement by NERC Compliance in its guidance document, “Following final approval of the Reliability Standard, Compliance will develop the final Reliability Standards Auditor Worksheet (RSAW) and associated training.” What training will NERC compliance develop? Is this training for industry or auditors? Is this training the type of how to comply with the standard? This would be helpful to industry in preparing for implementing a new standard. However, we would strongly disagree that this should be a standard that requires enforceable training requirement. (7) We request that a draft RSAW be developed and published with the standard. The compliance guidance is helpful, but does not provide enough details. We request additional guidance on how this standard will be audited. (8) Thank you for the opportunity to comment.

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| Group |
| Tennessee Valley Authority |
| Dennis Chastain |
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| Yes |
| The burden of this standard is well beyond what most might think it is. |
| Individual |
| Scott Brame |
| North Carolina Electric Membership Corporation |
| |
| Yes |

(1) Model validation is a good topic for a technical guideline document and we would have preferred that the drafting team consider other alternatives to developing a standard and work with the NERC Planning Committee to issue a guideline in lieu of a standard. The drafting team also concedes that “validation of model data is a good utility practice, but it does not easily lend itself to Reliability Standards requirement language. Furthermore, it is challenging to determine specifications for thresholds of disturbances that should be validated and how they are determined.” We fully understand why the drafting team persists that this be a standard, but we still recommend that the drafting team provide some sort of threshold of disturbances and technical justification as in our opinion, there still remains much ambiguity in the current language of the requirement. (2) For Requirement R1, Parts 1.1 and 1.2, what is the technical justification for performing simulations once every 24 months? Without technical justification for the 24 months, this timeline appears to be arbitrary. We continue to ask the drafting team to provide a rationale. (3) The new parenthetical in R1, part 1.3 “(Use a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison and complete each comparison within 24 calendar months of the dynamic local event)” may be interpreted in various ways by PCs who are attempting to comply with this requirement. Can the drafting team consider providing a little more guidance to the PCs? (4) For Requirement R1, Part 1.3 needs to be modified to remove the clause “unacceptable differences in performance” because this language is ambiguous. The compliance guidance states that an entity will be required to include documented guidelines to determine whether the differences are unacceptable. These guidelines are subjective and open to multiple interpretations as to what unacceptable differences in performance actually are and there could be inconsistent application during an audit. (5) For Requirement R2, this requirement meets Paragraph 81 criteria because it is administrative, focuses on data collection activities, and requires periodic updates that do not directly support reliability. Furthermore, we cannot fathom a situation in which an RC or TOP would refuse to provide data to their associated PC for the purposes of improving their modeling. This is particularly true given that almost all PCs are also registered as RCs and TOPs. Today the NERC registry shows there are 81 registered PCs. Of these 81, only 4 are not also registered as a TOP or RC. All four of these are part of a larger system in which models are developed primarily by larger. For example, three are located in Georgia and are part of the Georgia Integrated Transmission System that is jointly planned. The last remaining one is part of a joint action agency in Florida which is usually integrated into larger system. The bottom line is that this requirement is further obviated by the fact the PCs can get the necessary modeling information internally. We continue to request that the drafting team reference the P81 criteria and provide rationale why the requirement should remain in the standard. After our review of the criteria, we have determined that the requirement be struck in its entirety. (6) In regard to the statement by NERC Compliance in its guidance document, “Following final approval of the Reliability Standard, Compliance will develop the final Reliability Standards Auditor Worksheet (RSAW) and associated training.” What training will NERC compliance develop? Is this training for industry or auditors? Is this training the type of how to comply with the standard? This would be helpful to industry in preparing for implementing a new standard. However, we would strongly disagree that this should be a standard that requires enforceable training

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| requirement. (7)We request that a draft RSAW be developed and published with the standard. The compliance guidance is helpful, but does not provide enough details. We request additional guidance on how this standard will be audited. (8)Thank you for the opportunity to comment. |
| Individual |
| Bill fowler |
| City of Tallahassee |
| |
| No |
| R1.2: the standard should provide guidance as to the scope of an acceptable event and parameter better defining the term local. R1.3: the language does not provide for consistency across differing PCs in a geographic region. (See comment R1.2) R1.4: the language does not provide for consistency across differing PCs in a geographic region (see comment R1.2) |
| Group |
| ISO/RTO COuncil Standards Review Committee |
| Greg Campoli |
| |
| Yes |
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Additional Comments:

Seminole Electric Cooperative, Inc.
Michael Haff

COMMENTS

The SDT allows entities to determine what amount of difference is “unacceptable” in Requirement R1 Part 1.3. If an entity does not believe that attempting to verify long-term planning models against actual system responses produces more accurate models, this Requirement appears to allow an entity to state an “unacceptable difference” that an entity may never experience, e.g., 1,000% difference between a model variable and an actual system response, if the entity truly believes that no amount of difference is unacceptable. Can the SDT comment on the scenario when entities choose very large differences due to the fact they do not believe low comparison differences are unacceptable?