

Standard Authorization Request (SAR) Form

Title of Proposed Standard:	Define (Physical) Connection Requirements
Request Date:	March 7, 2002
Authorized for Posting:	March 20, 2002
SAR ID# :	PHYSICAL_CON_REQ_01_01

SAR Requestor Information		SAR Type (Put an 'x' in front of one of these selections)	
Name:	Jim Byrd	X	New Standard
Primary Contact:	Jim Byrd		Revision to existing Standard
Telephone:	214-743-6870		Withdrawal of existing Standard
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Purpose/Industry Need (Provide one or two sentences)

To establish a standard for the proper physical connection of generation substations, transmission facilities, and load substations to the transmission systems to maintain reliability.

Brief Description (A few sentences or a paragraph) Provide enough detail so that an independent entity familiar with the industry could draft a Standard based on this description.)

Requirements shall be established for the development and implementation of a plan for the physical connection of generation, transmission, and substation facilities to the transmission systems. Requirements shall be developed to necessitate adherence to applicable standards for maintaining reliability, such as the requirements for determining operating limits and requirements for automatic control and protection systems.

SAR: Define (Physical) Connection Requirements

Reliability Functions

The Standard will Apply to the Following Functions (Put an 'X' in front of each one that applies)		
	Reliability Authority	Ensures the reliability of the bulk transmission system within its Security Authority Area. This is the highest reliability authority.
	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its metered boundary and supports system frequency in real time
	Interchange Authority	Authorizes valid and balanced Interchange Schedules
	Planning Authority	Plans the bulk electric system
	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
X	Transmission Owner	Owns transmission facilities
	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders
X	Distribution Provider	Provides and operates the "wires" between the transmission system and the customer
X	Generator	Owns and operates generation unit(s) or runs a market for generation products that performs the functions of supplying energy and Interconnected Operations Services
	Purchasing-Selling Entity	The function of purchasing or selling energy, capacity and all necessary Interconnected Operations Services as required.
	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user

SAR: Define (Physical) Connection Requirements

Reliability and Market Interface Principles

Applicable Reliability Principles (Put an 'x' in front of all that apply)	
X	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions.
	2. The frequency of interconnected bulk electric systems shall be controlled within defined limits through the balancing of electric supply and demand
X	3. Information necessary for planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably
	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented
X	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems
	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified and have the responsibility and authority to implement actions
X	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis
<p>Does the proposed Standard comply with all of the following Market Interface Principles?</p> <p style="text-align: right;">Yes</p> <p><i>(Enter 'yes' or 'no')</i></p>	
1. Interconnected The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy	
2. An Organization Standard shall not give any market participant an unfair competitive advantage	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard	
5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards	

Define (Physical) Connection Requirements

<i>SAR Commenter Information</i>			
Name	David H. McMillan		
Organization Calpine			
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E-mail	dmcmillan@calpine.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Bill Carr		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The purpose/industry need section should start with: The purpose of this standard is to ensure that a consistent, uniformly applied standard is developed for ...			

<i>SAR Commenter Information</i>			
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E-mail	jhughes@elcon.org/janderson@elcon.org		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The establishment of this SAR is premature. All commercial implications of the SAR should be identified and mitigated prior to the drafting.			

<i>SAR Commenter Information</i>	
Name	Phil Park
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: If this SAR is to address physical connection requirements, then the sentence "These connection requirements will include a description of real and reactive power requirements for all elements of the transmission system (including generators)" should be eliminated. It is not clear why real power requirements need to be specified. Load power factors can be specified by TOs and DSPs. See my other comments below.</p> <p>Other comments: The purposes served by this SAR could theoretically be determined in a commercial venue on a generator by generator basis through negotiations with the connecting utilities. One purpose for having a standard on this would be to provide a standard treatment for all generators. Consequently this SAR is more of a technical specification for a commercial requirement, rather than a core reliability requirement. We would have a specification such as this if required to ensure equal treatment of generators or if the cost of meeting the specification was low enough that it was not worth negotiating one-off requirements for each generator. One option to the reactive power requirements proposed for this SAR could be ancillary services charges/payments for reactive power associated with transfers, which ties this SAR into the tariffs. This SAR appears to have significant commercial issues.</p>	

<i>SAR Commenter Information</i>			
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Organization	MAAC		
Telephone	610-666-8854	Fax	610-666-2297
E-mail	dicapram@pjm.com		
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments:</p> <p>Physical Interconnection Agreements are contractual arrangements. These arrangements are directly tied to Transmission Facility owners and NOT to North American standards.</p>			

<i>SAR Commenter Information</i>			
Name	Mike Miller		
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None			

<i>SAR Commenter Information</i>			
Name	Alan Johnson		
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Mirant does not believe that this standard is necessary. It encompasses issues that are covered in other SARs. If it is determined that the standard is necessary however, must keep in mind that today's Interconnection Agreements are contracts which cover issues other than reliability. The standard must not attempt to resolve non-reliability oriented, commercial issues.</p>			

April 23, 2002

SRP Comments on NERC 11 SAR sent out on April 2, 2002.

All 11 SAR's (this group of 10 plus the one sent out earlier) don't contain enough information to make the kind of judgments requested on the forms. Therefore the forms are not filled out.

We recommend all the SAR's be advanced to the next step to develop the specific standards and associated measurements for each standard so that we can evaluate and comment on them.

All of these SAR's are needed for reliable planning and operation of the bulk electric transmission system and meet the principle requirements.

Comments on the White paper:

1. The paper fails to state what standards are supposed to be. This seems so basic; one has to assume that those drafting the white paper want to redefine the definition contained in the Organizational Standards Manual. This leads to a lot of confusion and is not the place to do that.
2. The Planning Standards were written in a different time period than the Operating Policies with different objectives. Thus they are different and that should be recognized. For instance the development of a Planning Functional model has absolutely nothing to do with whether control areas exist or not and whether companies have restructured or not. The statement about control areas may be true for the Operating Policies but it is not true for the Planning Standards.

The Planning Standards (Templates) were written to meet the definition of a standard in the Organizational Standards Manual, to meet at least one of the Reliability Principles, to comply with all the Market Interface Principles and to contain the compliance administration elements. This is very different than what is contained in the Operating Policies. The Planning Standards need to go through the new process so that both the Operating elements and Planning elements of the Organizational Standards are consistent, are not duplicative and are needed for reliability.

3. The term "core reliability requirement" is used in the white paper but is never mentioned in the Organizational Standards Manual. Using an undefined term is very misleading and should be avoided.
4. The paper in several places address "what performance must be achieved". As noted above, an Organizational Standard can be broader than that and this write up is misleading.
5. The process has been lengthened because of the multiple posting of the SAR's. NERC has a body of reliability requirements written up into Compliance Templates. With very little effort these could be written up into SAR's that would provide sufficient detail for NERC to evaluate them. It is very hard to comprehend why one does not use this work to expedite the process. Instead SAR's are sent out with insufficient information. The process is long enough. We should be looking for all ways possible to speed it up.

Comments on the SAR write-up:

1. The SAR write-up only contains the purpose and brief description of a standard. Where is the Standard? I thought that is what the SAR is for?
2. The descriptions are in most cases extremely vague. The write-ups contain words like "such as" or "as defined in the standard". These are big enough to cover a MAC truck. Once again there is insufficient information to make a good judgment.



April 29, 2002

Guy V. Zito
Manager, Planning
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RE: NEPOOL Compliance Working Group (NCWG) comments pertaining to the 10 Standard Authorization Requests (SARs) posted for open comment

The NCWG has reviewed the 10 SARs posted for open comment and has agreed they are core standards, which serve a purpose in support of reliability.

Standard Title:

Prepare for and Respond to Abnormal or Emergency Conditions
Prepare for and Respond to Blackout or Island Conditions
Coordinate Interchange
Coordinate Operations
Monitor and Analyze Disturbances, Events and Conditions
Operate Within Limits – Monitor and Assess Short-term Transmission
Define (Physical) Connection Requirements
Design, Install, and Coordinate Control Protection Systems
Assess Transmission Future Needs and Develop Transmission Plans
Determine Facility Ratings, Operating Limits, and Transfer Capabilities

We do not agree that the **SAR Type** is a new standard. We suggest that at a minimum the SAR should indicate the existing standard and whether or not it will be withdrawn when the revised standard is adopted. We suggest that NERC stop the open process of reviewing existing policies and standards if these Organizational Standards will replace them. NERC should clearly indicate that one purpose of the Organizational Standards Process is to replace existing standards.

Sincerely,
Daniel L. Stosick

Chairman, NEPOOL Compliance Working Group
C/o ISO New England, Inc.
One Sullivan Road
Holyoke MA 01040-2841

Cc: NEPOOL Compliance Working Group
CP9 Working Group
Paul Shortly
Richard Burke
Richard Kowalski

<i>SAR Commenter Information</i>			
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E-mail	robert.smith@aps.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Mr. Charles Moser (Northborough, MA) and Mr. Ronald Halsey (Syracuse, NY)
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Again, the standard as written is much too detailed to be useful to all Regions. All that is required is that the Regions have in place Connection Requirements that will allow the Region to meet the transmission system performance based reliability requirements defined in the first standard.</p>	

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Other comments: Comments to be provided by others			

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Paul Rocha
Organization	Reliant Energy HL&P
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<p>Interconnection schemes should be designed to meet the applicable planning standard for the transmission system. HL&P sees no value in developing a separate, stand-alone interconnection standard. If a standard is developed, the same tradeoff between reliability, costs, and landowner impact exists as discussed in our comments concerning transmission planning standards. Therefore, like the transmission planning standard, we believe that if NERC chooses to develop a standard, it should not apply to the intrastate ERCOT region.</p> <p>Furthermore, it is worth noting that, like the issue of generator control standards, there are commercial and public policy considerations in the design of interconnection schemes. It has long been the case that, whether connected at the distribution level or transmission level, some customers will desire more reliability than others. Typically, the rules for how this issue is addressed are found in individual utility service extension tariffs reviewed and approved by regulatory authorities. Most tariffs contain the concept of providing a standard service extension, with cost responsibility for non-standard service borne by the requesting customer, so that other customers are not harmed by the additional requirements of such customers.² These issues are best addressed by regulatory authorities, not by NERC.</p>	
<p>² A non-standard service request could be for additional reliability or for other reasons, such as aesthetics (underground service extension lines, for example).</p>	

<i>SAR Commenter Information</i>			
Name	Brant Eldridge		
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<p>ECAR has conducted a survey of its member companies regarding the eleven SARs, which NERC has initiated to-date. We recognize that the comment period for the first SAR issued ("Balance Resources and Demand") has already closed. However, considering that the first SAR was issued earlier than the other ten primarily just to get the process started, and further considering that all 11 SARs are viewed by NERC as a possible complete set of Organization Standards (re: the "White Paper"), ECAR believes that comments on the first SAR should still be considered along with those on the other ten.</p> <p>11 of the 18 ECAR Full Members, along with two Associate Members, submitted responses to the SAR survey. Some of the responses were submitted using the NERC "SAR Comment Form", while others were contained in narrative e-mails, and one was faxed to us. Therefore, a complete set of the ECAR member company responses will be sent to the Standards Process Manager at NERC via Fed Ex to arrive at NERC by May 3rd. The Fed Ex package will include a copy of this e-mail. FYI, NERC may also receive some of the ECAR member company responses directly from the companies. Some of the individual company responses will be identical to what will be in the Fed Ex package and some will contain more detailed comments.</p> <p>The ECAR member company responses contain numerous and wide-ranging comments about the need for each of the 11 proposed Organization Standards, as well as comments regarding the scope and applicability of the SARs. As your review of these responses will show, there is general ECAR consensus – but not unanimity -- that the 11 SARs as a set cover the scope of performance needed to ensure reliability of the interconnected North American bulk power systems. Some ECAR members feel that there are performance areas not covered in the proposed set of Organization Standards, and they have provided what they think is missing. Others believe that some of the proposed Organization Standards are not needed, and they explain why they feel that way. Numerous comments were directed at the scope and applicability of the SARs. Several ECAR companies questioned the inclusion of the "Distribution Provider" function in the applicability section of the SARs, believing that NERC should stick to its traditional focus on the bulk power systems and stay out of the distribution arena.</p> <p>The recent call for nominees to serve on SAR Drafting Teams is the appropriate next step. ECAR believes that all 11 SARs need to be refined to reflect industry comments and then posted again for another round of industry comments. Before proceeding into actual development of Organization Standards based on these 11 SARs, NERC must have clear industry consensus on the need for each of the Organization Standards outlined in the 11 SARs, as well as consensus on the scope and applicability of those SARs.</p> <p>If the wide-ranging comments received from ECAR members are any indication, there is still some serious work to be done to achieve the needed clear industry consensus on how to proceed.</p>			

<i>SAR Commenter Information</i>			
Name	David L. Hart		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: Once again are the transmission owners the ones that should be responsible? What about operators or providers?			

<i>SAR Commenter Information</i>			
Name	Lew Gray, Mike Holtsclaw, Steve Clouse		
Organization	Indianapolis Power & Light		
Telephone	317-261-8126	Fax	317-261-8996
E-mail	lew.gray@aes.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	David W. Sandefur		
Organization	Hoosier Energy REC, Inc.		
Telephone	812-876-0267	Fax	812-876-3139
E-mail	dsandefur@hepn.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
Other comments: The Distribution Provider functional area should be removed from this Standard since NERC standards should continue to focus on regional or larger scale reliability issues. To reach down to the distribution level will broaden the scope significantly and unnecessarily.			

<i>SAR Commenter Information</i>	
Name	Verne B. Ingersoll, II
Organization	Progress Energy - Carolina Power & Light Company and Florida Power Corp.
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Coordination with all entities responsible for protective relaying. Coordination is a key component of this standard and is not addressed in the scope. The reliability functions should include coordination among all entities that design, install, operate, maintain and test controls and protective relays. For example, LSEs are the primary entities responsible for load shedding and are not included in the list.</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: It appears from the "Description" that this could include AGC. The AGC should be separate from the transmission system protection and controls. Other comments: It isn't clear what automatic control refers to. For instance, is capacitor control included, generation control, etc.</p> <p>It seems like a broad topic to cover such a short description.</p> <p>There should be a differentiation between AGC and transmission protection system and control areas. The two are not really related at the design level. AGC is covered by number 5 in the initial listing.</p> <p>The SDT will need to take care to include all previously approved Standards related to protection and control.</p> <p>Design standards are presently covered by IEEE and other organizations. NERC standards should not overlap with these technical standards.</p> <p>The title does not include maintenance and the purpose does. The description includes both.</p> <p>What are the reliability standards that are mentioned in the description? Does this refer to Table I in the current I.A. standard?</p>	

SAR Commenter Information	
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E-mail	cyeung@reliant.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: A plan is not a standard. This SAR does not propose any measurable or quantifiable boundary conditions for achieving reliability. It only proposes that a plan be assembled that describes the physical interconnection requirements necessary to achieve reliability requirements established through other standards.</p> <p>Other comments: Though such an interconnection plan may be beneficial to ensure interconnection of equipment to the grid is done in a reliable manner, such a requirement will not contain meaningful and measurable conditions. The core reliability that this SAR proposes to achieve is already contained in SARs such as: Determine Facility Ratings, Operating Limits and Transfer Capabilities; Design, Install, and Coordinate Control and Protection Systems; Prepare for and Respond to Abnormal Emergency Conditions, Prepare for and Respond to Blackout or Island Conditions; Monitor and Analyze Disturbances, Events and Conditions; Balance Resources and Demand. This standard as proposed will be difficult to measure and enforce. There are numerous procedures and requirements that may be required to facilitate the reliability needs, however, not all of them fall under the definition of a core Organization Standard that is measurable. NERC must distinguish these requirements from core Organization Standards and apply an appropriate standards development process for them.</p>	

<i>SAR Commenter Information</i>			
Name	Kirit S. Shah		
Organization	Ameren Services -Energy Delivery Technical Services		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The scope is too general.			

<i>SAR Commenter Information</i>			
Name	Dan Wheeler		
Organization	NorthWestern Energy		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	John K. Loftis, Jr.
Organization	Dominion Virginia Power
Telephone	804 - 273 - 3897
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E-mail	john_loftis@dom.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: (1) - This SAR also applies to the Planning Authority function. (2) - Consideration should be given to developing a "pro-forma" format for use in developing connection requirements documents. This "pro-forma" would provide guidelines on what required elements should be included, and would promote more consistency. Currently, some entities' facilities connection requirements consist of a 1 page document, while others have developed a 200 page document. (3) - Future development of this SAR should also take into consideration the direction of FERC regarding a "pro-forma"/standardized set of generation interconnection procedures.</p>	

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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	George Bartlett		
Organization	Entergy Services		
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E-mail	gbartle@entergy.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: Any requirements for the interconnection of generation, transmission or substation equipment should be established by the facility owner and the transmission owner. NERC should not be establishing equipment design, performance, coordination, installation, nor maintenance requirements. This is not a "core reliability" Organization Standard and should be eliminated.			

<i>SAR Commenter Information</i>			
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Other comments: To the extent that this SAR is transitioning an existing standard from the old world to the new world (Functional Model), then the standard should not go beyond the original scope. Consistent with our general comments, once the clarity is achieved on Standard Market Design and RTO formations, then this standard should be revisited and reevaluated.			

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Requirements for determining operating limits is already specified in another SAR - what is meant by this?</p> <p>Other comments: If this refers to the development of the connection document by the Transmission Owner then why are Distribution Providers and Generators indicated as functions that this standard will apply?</p>	

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
Organization Bulk Power Operations Southern Company			
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None			

<i>SAR Commenter Information</i>	
Name	Peter Burke (submitting comments provided by numerous ATC contributors)
Organization	American Transmission Company
Telephone	262-506-6863
Fax	262-506-6709
E-mail	PBurke@atcllc.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Guidelines for including connection requests in regional models.</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Any reference to connection of distribution provider connections unless in the judgment of the transmission provider it affects the reliability of the interconnected system. The bulk power system may need to be defined as those stations in the normal course or under single contingency. Also should only address new sites or where major revisions occur and can be feasibly upgraded.</p> <p>Other comments: (1) This standard should state the minimum requirements and should not prevent the transmission owner from establishing additional requirements if necessary.</p> <p>It seems that the Reliability Authority should play a role considering it is responsible for the reliability of the bulk transmission system. They should ensure that an entity connecting to the bulk transmission system conforms to their requirements.</p> <p>(2) May also need to address the issue of local regulatory input on reliability and access standards for distribution or customer choice.</p> <p>(3) It would seem that to facilitate the ability to provide a reliable transmissison system there is also a need to develop some guides for modeling requested connections in system models. The eastern interconnection can't do a reasonable reliability study right now because most parties responsible for planning the system have no idea which connections should be modeled in their own system let alone in surrounding systems.</p> <p>(4) The "transmission operator" reliability function should also apply since they are the people that will need to operate that physical connection.</p>	

<i>SAR Commenter Information</i>			
Name	Bob Pierce		
Organization	Duke Power		
Telephone	(704) 373-6480	Fax	(704) 382-7887
E-mail	rwpierce@duke-energy.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The SAR should also apply to the following organizations: Planning Authority, Transmission Operator, and Load-Serving Entity.			

<i>SAR Commenter Information</i>	
Name	David Little
Organization	Nova Scotia Power Inc.
Telephone	902 428-7580
Fax	902 428-7550
E-mail	david.little@nspower.ca
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p>Yes</p> <p>Is the Scope of the SAR fine as it is?</p> <p>No</p> <p>Other Comments</p> <p>Based on the Purpose / Description, as stated in the SAR, the purpose of the standard which is to follow is not clear.</p> <p>A standard based on this description appears to be getting into the "how" to design / build area. The White Paper on NERC's Organization Standards suggests that the standards will be focused on defining "what" performance levels are required.</p>	

<i>SAR Commenter Information</i>			
Name	Art Giardino		
Organization	Public Service Electric & Gas		
Telephone	973 430-6374	Fax	973 242-6074
E-mail	arthur.giardino@pseg.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: It is premature to continue development of this SAR until FERC has specified the organization to be responsible for the development of wholesale electric standards.			

<i>SAR Commenter Information</i>		
Name	Compliance Subcommittee	
Organization	SERC (Contact = Nancy Fallon)	
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None		

<i>SAR Commenter Information</i>		
Name	OPWG	
Organization SERC (Contact = Nancy Fallon)		
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None		

<i>SAR Commenter Information</i>		
Name	Planning Standards Working Group (PSWG)	
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Is there a reliability-related need for an Organization Standard to be developed on this topic?		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is		

<i>SAR Commenter Information</i>	
Name	Gary Won and Don Tench Comments submitted on behalf of the Independent Electricity Market Operator (IMO)
Organization	Independent Electricity Market Operator (IMO)
Telephone	905-855-6427
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E-mail	gary.won@theimo.com and don.tench@theimo.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>The SAR must be rigorously tested against the White Paper requirements to specify what performance must be achieved rather than how to achieve it. For example, in what way is a 'plan for the physical connection of generation....' a performance standard?</p> <p>The scope should be reduced to eliminate the development and implementation of a plan. The need is for a set of criteria applicable to the assessment of proposals for new or modified physical connections to the transmission system, to ensure that system reliability is maintained. These criteria would be applicable to generator, transmission and load facilities.</p>	

<i>SAR Commenter Information</i>	
Name	David Scarpignato
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	Fax
E-mail	scarp@bge.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entity(ies) is responsible for standards it will make sense to move forward with said entity.</p> <p>Even if NERC wants to cover reliability standards, almost all standards have a reliability and commercial impact; thereby, necessitating developing a single process that incorporates both commercial and reliability aspects of standards development. The current NERC process risks being changed soon, discounts commercial aspects, and is not part of a finalized overall industry process.</p> <p>Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.</p>	

<i>SAR Commenter Information</i>	
Name	R. Scott Henry, Chairman
Organization	Interconnected Operations Services Subcommittee, NERC
Telephone	(704) 382-6182
Fax	
E-mail	rshenry@duke-energy.com
Is there a reliability-related need for an Organization Standard to be developed on this topic?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is	

<i>SAR Commenter Information</i>	
Name Jim Cyrulewski Manager -Michigan Electric Power Coordination Center	
Organization Michigan Electric Coordinated Systems (MECS)	
Telephone 734-665-3628	Fax 734-665-3480
E-mail cyrulewskij@dteenergy.com	
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The Transmission Operator also has a role since the TO will be operating the transmission facilities that are interconnected.</p>	

<i>SAR Commenter Information</i>			
Name	Kent Saathoff		
Organization	Kent Saathoff		
Telephone	(512)225-7011	Fax	(512)225-7020
E-mail	ksaathoff@ercot.com		
Comments			
<p>This SAR and the other posted SARs provide an appropriate framework for transitioning existing NERC Operating Policies and Planning Standards into new, NERC Organization Standards. Multiple compliance measures may be defined and developed for each of the eleven proposed Organization Standards. The Organization Standards and related compliance measures should focus on what functions must be performed for reliability, on who is responsible for each compliance measure for each required function and not, on how the compliance measure is achieved. The compliance measure must be measurable or demonstrable to ensure compliance.</p> <p>Detailed physical requirements for connecting generation, transmission and substation facilities to an electric system will differ depending on the facility and system characteristics. A Standard addressing these requirements should only include the basic considerations needed to reliably connect the facility to the system.</p> <p>This Standard should also include requirements to Design, Install, and Coordinate Control and Protective Systems (SAR ID# PROTECT_SYSTEMS_01_01) related to these facilities.</p> <p>Requirements for coordinating switching procedures be included in this SAR or in SAR ID# COORD OPERATIONS 01 01.</p>			

<i>SAR Commenter Information</i>	
Name	Ronald Gunderson
Organization	MAPP Reliability Council
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Fax	(402)845-5205
E-mail	rogunde@nppd.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The scope of the standard should be specific to system reliability.</p> <p>Other comments: This Standard should define a requirement for the Transmission Owners to develop a document which defines what the physical connection requirement is. The elements to be included in this document should not be narrowly defined in the Standard but should be flexible in scope to address specific regional requirements which may exist.</p>	

<i>SAR Commenter Information</i>			
Name	Linda Clarke		
Organization	Exelon Corporation		
Telephone	(610) 765-6698	Fax	(610) 765-6698
E-mail	lclarke@pwrteam.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The other SARs should ensure that the connection requirements will meet the reliability standards. The plan is outside the scope of work. The FERC's Notice of Proposed Rulemaking for Generation Interconnections provides a means by which NERC can provide comments on the plan for physical connection.			

<i>SAR Commenter Information</i>			
Name	Carter B. Edge		
Organization	Southeastern Power Administration		
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E-mail	cartere@sepa.doe.gov		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: There needs to be a way to address an existing connection that has been operating reliably in the past. That is, if a proven connection is functioning reliably it should be evaluated rather than mandated to change its connection.			

<i>SAR Commenter Information</i>			
Name	Warren Schaefer		
Organization	Dairyland Power Cooperative		
Telephone	608/787-1252	Fax	608/787/1327
E-mail	wjs@dairynet.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The scope of the standard should be specific to system reliability.			
Other comments: This Standard should define a requirement for the Transmission Owners to develop a document, which defines what the physical connection requirement is. The elements to be included in this document should not be narrowly defined in the Standard but should be flexible in scope to address specific regional requirements, which may exist.			

<i>SAR Commenter Information</i>			
Name	Mike Miller		
Organization	Southern Company		
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None			

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
Organization Bulk Power Operations Southern Company			
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E-mail	jsgriffi@southernco.com		
None			

<i>SAR Commenter Information</i>	
Name	Southern Company
Organization	
Telephone	(205) 257-4222
	Fax (205) 257-1040
E-mail	DGPIATT@southernco.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments:</p> <p>We agree that NERC has a role in establishing a set of minimal requirements that provide direction for system interconnection; however, as written this SAR is entirely too broad and needs to be much more specific in nature. The scope of this standard should not be expanded beyond the current I.C.S1.M1 standard. Due consideration should be given to ensuring that existing plants do not have new requirements imposed upon them that exceed their current interconnection requirements. A grandfather and/or back-fit rule should be included to protect existing facilities, which are already interconnected with the grid. New requirements should only be imposed on existing plants where there is a clear reliability need with supporting technical justification.</p>	

<i>SAR Commenter Information</i>			
Name	Jon. Loesch		
Organization	FirstEnergy Solutions		
Telephone	330-315-7313	Fax	330-315-6773
E-mail	LoeschJ@FirstEnergyCorp.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include: responsibility for development of the interconnection plan by an independent entity.			

<i>SAR Commenter Information</i>	
Name	Ray Morella
Organization	FirstEnergy Corp
Telephone	330.336.9831
Fax	330.336.9024
E-mail	morellar@firstenergycorp.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: There should most definitively be a standard that governs the physical connection of generation substations, transmission facilities, and load substations to the transmission system. With the expanding market of independent generation we clearly need standards that will govern the connection criteria of these entites. Even without the expanding independent generator sector, our industry needs to create viable, equitable, and responsive criteria that addresses generation, transmission, and load connection points. FERC, with its pending ruling on generation standard protocol, has already taken a step in this process. A standard that NERC can develop that will be consistant with the FERC effort would be beneficial. No such standard that specifically addresses load and transmission, other than current NERC policy, exists today.</p>	

<i>SAR Commenter Information</i>			
Name	Scott Helyer		
Organization	Tenaska		
Telephone	817-462-1512	Fax	817-462-1510
E-mail	shelyer@tnsk.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: It appears that specifying requirements for operating limits and AGC go beyond the Physical Connection Requirements. We need to ensure that this Standard would not overlap another reliability standard on operating limits and that we do not create a reliability requirement that AGC is needed for all generators when the market should decide which generators require AGC. Writing a standard that indicates how AGC should be provided if a generator wishes to provide such a service would be acceptable.			

<i>SAR Commenter Information</i>			
Name	Kenneth A. Githens		
Organization	Allegheny Energy Supply		
Telephone	412-858-1635	Fax	412-856-2912
E-mail	kgithen@alleghenyenergy.com		
The scope of the SAR should be reduced to eliminate: This standard should define items directly related to the point of demarcation only (i.e. one breaker versus back-to-back breakers) and not issues that would have market implications.			

<i>SAR Commenter Information</i>	
Name	Chifong Thomas
Organization Pacific Gas and Electric Company	
Telephone	(415) 973-7646
Fax	(415) 973-8804
E-mail	clt7@pge.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: If this SAR also includes requirements for machine characteristics, such as AVR, relay coordination, etc. then Planning Authority and Reliability Authority Functions would need to be added.</p>	

<i>SAR Commenter Information</i>			
Name	Vahid Madani		
Organization	WECC Remedial Action Scheme Reliability Task Force		
Telephone	(510) 874-2300	Fax	(510) 874-2442
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None			

<i>SAR Commenter Information</i>	
Name	Ed Riley
Organization	California ISO
Telephone	(916) 351-4463
Fax	(916) 608-5906
E-mail	eriley@caiso.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: This SAR appears to be a duplicate of portions of the preceding SAR - "Determine Facility Ratings, Operating Limits, and Transfer Capabilities" - specifically the sections regarding transmission facilities and load substations. An addition to the preceding SAR may be more appropriate to cover new generator interconnections. Additionally, FERC has a NOPR out on generator interconnections which may codify some of the details of this SAR thus making a standard unnecessary or redundant.</p>	

<i>SAR Commenter Information</i>	
Name	Mr Paul Tremblay, Mr. Mike Penstone, and Mr Ajay Garg
Organization	Hydro One Networks Inc.
Telephone	416 345-5420
Fax	416 345-5422
E-mail	ajay.garg@HydroOne.com; mike.penstone@HydroOne.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: We do not believe that a detailed NERC standard, as written is required. Regions/RTO/ and entites operating Bulk Electric System should establish Connection Requirements to meet defined performance standards for the interconnected Bulk Electric System.</p>	

<i>SAR Commenter Information</i>			
Name	Marv Landauer		
Organization	BPA		
Telephone	360-619-6602	Fax	360-619-6945
E-mail	mjlandauer@bpa.gov		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The last sentence of the description should be modified to add the words "and safety" after "standards for maintaining reliability" and delete the words "the requirements for determining operating limits and". This standard should be for physical connections, not operations.			
Other comments: This standard must allow for Transmission Owners to supplement the standards with their own requirements.			

<i>SAR Commenter Information</i>	
Name	Francis J Halpin
Organization	Bonneville Power Administration - Power Business Line
Telephone	503 230 3000
Fax	503 230 5669
E-mail	fjhalpin@BPA
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate: To separate into additional standard(s).</p> <p>Other comments: This seems too broad. Would like the SAC to consider a separate standard for generator connections, at the least. It seems that measurement criteria would be unmanageable with every possible type of connection addressed under a single standard. There are a broad range of Functional Entities, which would be affected by this standard. (suggest adding RA, PA, TOP, PSE, LSE to the list of functional groups to which this standard would apply) Segmentation into two or more standards would allow for more specific target functional groupings.</p>	

<i>SAR Commenter Information</i>	
Name	Edward Stoneburg
Organization	Illinois Power Company
Telephone	(217) 362 6363
	Fax
E-mail	edward_stoneburg@illinoispower.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is. There is no need for this standard. The defining of physical connection requirements by a Transmission Owner is a commercial issue. In defining those requirements the Transmission Owner would adhere to appropriate reliability standards such as Control and Protection or establishing Operating Limits.</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Planning Authority & Transmission Operator: In reviewing the Planning Authority and Transmission Operator Responsibilities Illinois Power believes that the PA and TO will play a significant roll in defining physical connection requirements and therefore this standard should apply to them as well as the Transmission Owner</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: In Reviewing the Distribution Provider and Generator responsibilities in the Functional Model, neither has any responsibility indicated for the activities identified in the SAR. This standard should not be applied to them.</p> <p>Other comments: The SAR indicates that this standard would apply to Generators and Distribution Providers. Today NERC Policy and Standards do not apply to these Functions. For example, NERC has no authority to require its standards to be applied to determine connection requirements for distribution facilities. And the application of NERC standards to Independent Generators are carried out by transmission owners through interconnection agreements. Is NERC proposing that this will change and they will begin to impose standards directly on distribution providers and generators? In any case neither a SAR nor a Standard should define the plan for physical connection of a generator, rather it should only be defining the reliability standards to be adhered to and achieved.</p>	

<i>SAR Commenter Information</i>			
Name	Saif Mogri		
Organization WECC Technical Studies Subcommittee			
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E-mail	smogri@email.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: If this SAR includes requirements for machine characteristics, such as AVR, relay coordination, etc., then the Planning Authority and Reliability Authority Functions would need to be added.			

<i>SAR Commenter Information</i>	
Name	Gerald N. Rheault
Organization	Manitoba Hydro
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The Industry Need has not been defined for this SAR.</p> <p>This Standard should define a requirement for the Transmission Owners to develop a document, which defines what his physical connection requirement is. The elements to be included in this document should not be narrowly defined in the Standard but should be flexible in scope to address specific regional requirements, which may exist.</p>	

<i>SAR Commenter Information</i>			
Name	Donald D. Taylor, PE		
Organization	Westar Energy		
Telephone	785-575-6430	Fax	785-575-1798
E-mail	don_taylor@wr.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The Purpose specifies "load substation", but the Brief Description says simply "substation". The term "substation" by itself is expansive enough to include all of them. The Planning Authority should be included in the Reliability Functions to ensure broad regional uniformity of the connection requirements.			

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Planning Authority in Reliability Functions			