NORTH AMERICAN ENERGY STANDARDS BOARD
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July 9, 2009
comments filed via email to smartgridcomments@nist.gov

Dr. George Arnold
Deputy Director
National Institute of Standards and Technology
100 Bureau Drive, Stop 2000
Gaithersburg, MD 20899-2000

Dear Dr. Arnold,

NAESB appreciates the opportunity to offer these comments to the initial set of standards and specifications proposed by NIST for inclusion in Release 1.0 of the Smart Grid Interoperability Standards Framework. We understand from NIST documentation that Release 1.0 is a work in progress with the recognition that it is not complete, nor is it exclusionary.

For the criteria upon which the standards and specifications are selected by NIST as industry consensus work products, we offer the following comments:

- Standards and specifications to be applied at a national level should be developed at a national level, or at a minimum vetted at a national level, where entities that will be expected to use the standards have had an opportunity to vote on the standards or otherwise provide input into their development and acceptance through an open and transparent process. We are unclear if all the standards and specifications noted in the list (see attached appendix) have undergone such review and national endorsement, and we understand that some of the items on the list are only now undergoing such a review. For those items that have not completed a national review and vote by a Standards Development Organization, we would recommend that it is premature to endorse the item as part of the initial list until the review and vote, including the incorporation of any changes endorsed by the SDO, is completed.
- Similarly, for standards and specifications that were developed for use regionally and in place for regional use, but that are now proposed to be applied nationally, we would again recommend that entities that will be expected to use the standards have an opportunity to vote on the standards or otherwise provide input into their development and acceptance. For those items that have not completed a national review by a SDO, we would recommend that it is premature to endorse the item as part of the initial list until the review and vote, including the incorporation of any changes endorsed by the SDO, is completed.
- Interoperability extends from the Smart Grid to the Power Grid, and for standards and specifications that interact with the bulk power system and may impact standards already in place that support reliability or market transactions, coordination should take place with either the North American Electric Reliability Corporation or NAESB.

We commend the groups that prepared the list of the initial set of standards and specifications, particularly considering the large industry meetings held to identify the list. We hope that you find our comments helpful in support of the development of an interoperable Smart Grid. We look forward to continuing to participate in your process as the needed Smart Grid suite of standards and specifications are adopted and put to use in the energy market.

With Best Regards,

Rae McQuade

Rae McQuade, President, NAESB

cc: Michael D. Desselle, Chairman of the NAESB Board of Directors
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Appendix – List of Proposed Standards and Specifications

NIST STANDARDS AND SPECIFICATIONS IDENTIFIED FOR INCLUSION IN THE SMART GRID INTEROPERABILITY STANDARDS FRAMEWORK, RELEASE 1.0	
STANDARD	**APPLICATION / DESCRIPTION**
AMI-SEC System Security Requirements	Advanced metering infrastructure (AMI) and Smart Grid end-to-end security
ANSI C12.19 – 2008	Revenue metering information model
BACnet ANSI ASHRAE 135-2008	Building automation
DNP3	Substation and feeder device automation.
IEC 60870-6 / TASE.2	Inter-control center communications (ICCP)
IEC 61850	Substation automation and protection
IEC 61968	Application level energy management system interfaces
IEC 61970	Application level energy management system interfaces
IEC 62351 Parts 1-8	Information security for power system control operations
IEEE C37.118	Phasor measurement unit (PMU) communications
IEEE 1547	Physical and electrical interconnections between utility and distributed generation (DG).
IEEE 1686-2007	Security for intelligent electronic devices (IED)
NERC CIP 002-009	Cyber security standards for the bulk power system
NIST SP 800-53	Cyber security standards and guidelines for federal information systems, including those for the bulk power system
NIST SP 800-82	Cyber security standards and guidelines for federal information systems, including those for the bulk power system
Open Automated Demand Response (Open ADR)	Price responsive and direct load control
OpenHAN	Home Area Network device communication, measurement, and control.
ZigBee/HomePlug Smart Energy Profile	Home Area Network (HAN) Device Communication and Information Model