



NextEra Commenting on NERC Standards

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Agenda

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- **Internal parties involved in standard commenting**
- **Tool utilized by NextEra to monitor standards**
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NextEra finds commenting on standards to be an excellent way to address upcoming requirements and ensure that the stakeholder process is followed

Importance of commenting on NERC Standards

- **Commenting on NERC standards under development ensures that all stakeholders have input into the process**
- **The standard development process is transparent and highlights how all comments are addressed**
- **Without stakeholder input and based on the make-up of the team, a standard could be approved and may increase various companies' compliance exposure levels**
- **NextEra is a supporter of the stakeholder process and submits comments for all standards which apply to its generation types and NERC registrations**

Internal parties involved in commenting on standards

- **Various internal parties are utilized during commenting on NERC standards based on the standard's subject matter including:**
 - Transmission and Substation personnel – Protection System Standards and various other topics, including Vegetation Management
 - Information Management – CIP Cyber Standards
 - Plant Operations – All relevant standards
 - Real-time desk staff – IRO and TOP standards
- **In addition, NextEra utilizes commenting made by Florida Power & Light, which is also part of FPL Group to ensure consistency**

Tool utilized in standard commenting

- NextEra utilizes Sharepoint to keep track of and maintain comments on the various standards under development
- Outlook reminders are set up for various Subject Matter Experts to ensure due dates for comments are met
- All details on the individual standard under development is also maintained in the Sharepoint list

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Nerc Standards Development, Commenting, Review, and Analysis Activity Tracking. For questions or concerns please contact Mike Sonnellitter

Type	Title	Category	Internal Status	External Status	RCG Priority	Due	RCG Meeting	Action Owner	Region	Applicability Matrix	Posting Status	Edit	Modified
	PRC-002-NPCC-1 (Disturbance Monitoring)	PRC	Review in Progress	Drafting	Medium	11/16/2009			NPCC	NextEra	Active		10/8/2009 10:13 AM
	Project 2009-21: Cyber Security Standards	CIP	Review in Progress	Drafting	High	11/12/2009			NERC	Both	Active		10/15/2009 10:52 AM
	Project 2007-06: System Protection Coordination	PRC	Commenting	Drafting	High	10/26/2009	10/22/2009 2:00 PM		NERC	Both	Active		10/23/2009 1:28 PM
	NERC Project: Functional Model - Version 5		Review in Progress	Drafting	Low	10/26/2009			NERC	Both	Active		10/8/2009 10:13 AM
	Project 2007-07: Vegetation Management (FAC-003-2)	FAC	Review in Progress	Drafting	Low	10/24/2009			NERC	Both	Inactive		10/26/2009 12:04 PM
	Project 2006-02: Assess Transmission & Future Needs	TPL	Review in Progress	Drafting	Low	10/16/2009			NERC	Both	Active		10/8/2009 10:13 AM
	SERC - PRC-006 - UFLS Standards	PRC	Commenting	Drafting	Low	10/15/2009				NextEra	Inactive		10/26/2009 12:04 PM
	SPP PRC-006	PRC	Review in Progress	Drafting	High	9/30/2009		Medina	SPP	NextEra	Inactive		10/8/2009 10:12 AM
	Project 2008-1: Voltage & Reactive	VAR	Commenting	SAR	Low	9/16/2009		TBD	NERC	Both	Inactive		10/8/2009 10:12 AM



NextEra commenting in other regions

- **NextEra is extensively involved in various regional standard development committees and contributes to regional comments on NERC standard development, including at the NPCC RSC Committee**
- **The Scope of Work for the NPCC RSC Committee includes providing consolidated regional commenting per the statement below:**

Scope of Work for the Regional Standards Committee (RSC)

The NPCC Regional Standards Committee (RSC), a committee of the NPCC Board, is charged with:

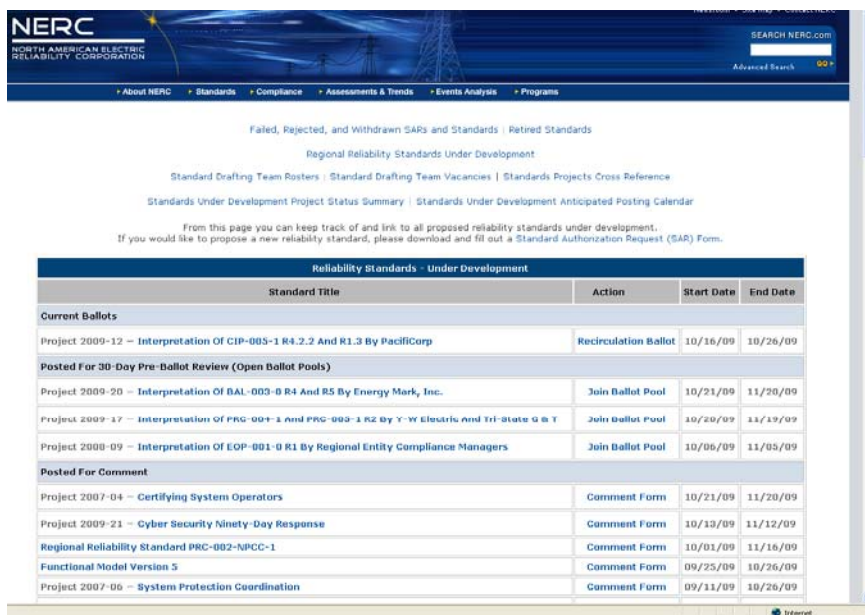
- (a) managing the NPCC Regional Standards Development Procedure; and
- (b) providing consolidated NPCC Regional review and comment to the existing and proposed NERC Standards and participate in the NERC Reliability Standards Development Procedure.



Recent commenting examples

- **NERC Generator Owner / Transmission Owner Team**
 - NextEra commented extensively on the work product of the NERC GO/TO Team
 - NextEra supported the direction with which the team is heading and wanted to ensure that the proper level of detail is provided to support several statements, including unit criticality and material impact
- **PRC-001 Standard Drafting Team**
 - NextEra commented on various statements made in the proposed standard including:
 - Providing more detail on the dispute resolution process
 - Deadlines for coordination (of six months) should be altered to accommodate the interconnection agreement process and more detail should be provided with regard to record keeping for protection system coordination

Where to go for additional resources



Failed, Rejected, and Withdrawn SARs and Standards | Retired Standards
Regional Reliability Standards Under Development
Standard Drafting Team Rosters | Standard Drafting Team Vacancies | Standards Projects Cross Reference
Standards Under Development Project Status Summary | Standards Under Development Anticipated Posting Calendar

From this page you can keep track of and link to all proposed reliability standards under development.
If you would like to propose a new reliability standard, please download and fill out a Standard Authorization Request (SAR) Form.

Reliability Standards - Under Development			
Standard Title	Action	Start Date	End Date
Current Ballots			
Project 2009-12 - Interpretation Of CIP-005-1 R4.2.2 And R1.3 By PacifiCorp	Recirculation Ballot	10/16/09	10/26/09
Posted For 30-Day Pre-Ballot Review (Open Ballot Pools)			
Project 2009-20 - Interpretation Of BAL-003-B R4 And R5 By Energy Mark, Inc.	Join Ballot Pool	10/21/09	11/20/09
Project 2009-17 - Interpretation Of PRC-001-1 And PRC-002-1 R2 By Y. W. Electric And Tri-State G & T	Join Ballot Pool	10/20/09	11/19/09
Project 2008-09 - Interpretation Of EOP-001-0 R1 By Regional Entity Compliance Managers	Join Ballot Pool	10/06/09	11/05/09
Posted For Comment			
Project 2007-04 - Certifying System Operators	Comment Form	10/21/09	11/20/09
Project 2009-21 - Cyber Security Ninety-Day Response	Comment Form	10/13/09	11/12/09
Regional Reliability Standard PRC-002-NPCC-1	Comment Form	10/01/09	11/16/09
Functional Model Version 5	Comment Form	09/25/09	10/26/09
Project 2007-06 - System Protection Coordination	Comment Form	09/11/09	10/26/09

- The Standard Development section is divided up into five sections: Current Ballots, Posted for 30 Day Pre-Ballot, Posted for Comment, Team Nominations Open and SARs and Standards Under Development
- The address to the Standards Development section is - http://www.nerc.com/filez/standards/Reliability_Standards_Under_Development.html

Typical Standard Comment Form

***Please use the [electronic comment form](#) to submit your final responses to NERC.**

1. The SDT determined that this standard is applicable to following registered entities: Transmission Owners, Generator Owners and Distribution Providers according to the NERC Glossary of Terms that clearly defines these entities in all NERC Regional Reliability Organizations. Do you agree with this? If not, please explain in the comment area.

Yes

No

Comments:

2. Due to the many meanings of coordination and our intention to clarify the purpose of the standard, the SDT has included a definition for the term "System Protection Coordination" as it applies to this standard. The intention was to target coordination of fault clearing protection systems. Do you agree that the definition is appropriate for this standard? If not, please explain in the comment area.

Yes

No

Comments: We do not disagree with the definition as written and suggest modifying the statement to end after "Fault."

3. This draft standard has placed specific deadlines in the requirements for information exchange, review, agreement and implementation. Do you believe that the amount of time provided for each of these actions is acceptable? If not, please explain in the comment area which times should be changed and what would be more appropriate.

Yes

No

Comments: The six month lead time on in-service dates is problematic. The timelines mentioned in the standard do not in any way improve reliability which is the primary purpose of any reliability standard. Also, if there are "business agreements/contractual agreements" between Generator Owner & Transmission Owner that provides timelines for the project, they should be the governing documents for those timelines. Creating new deadlines as in this standard might likely contradict standing business agreements/contractual agreements and will be confusing. Also, these timelines will be difficult to track and will require logging and maintenance of every phone call, email, document, etc to comply with the standard. This level of record keeping is cumbersome

- **The typical standard comment form has a list of questions for which an entity can answer "Yes" or "No" and also includes a comment section for each question, as well as a general comment area**

Questions and Comments

