

Comment Form - Reliability Standards Development Procedure

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IMPORTANT NOTE: *Please make sure to hit the FINISH button at the bottom of this survey to have your comments be submitted to NERC. You will then go to a final screen containing a code to verify your comments have been recieved.

Survey Response: Comment Form - Reliability Standards Development Procedure
Comment Request - Modifications to the Reliability Standards Development Procedure to Support BOT Actions
Response GUID: b8e2f6fa-1d5a-4952-b618-702cdd442cb7
Started: 4/27/2009 11:00:03 AM
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1) **Individual or group.**
Group

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2) **Group Name**
Transmission Access Policy Study Group (TAPS)

3) **Lead Contact**
William J. Gallagher

4) **Contact Organization**
Vermont Public Power Supply Authority (Registered Ballot Body selections are based on all TAPS members, not just VPPSA.) (Some other TAPS members are listed below with contact names and segments memberships; the full membership is too numerous to list here.

5) **Registered Ballot body segment (check all applicable industry segments)**
1 - Transmission Owners
3 - Load-serving Entities
4 - Transmission-dependent Utilities
5 - Electric Generators
6 - Electricity Brokers, Aggregators

6) **Contact Telephone**
(###) ###-####
(802) 839-0562

7) **Contact E-mail**

bgallagher@vppsa.com

8) Please complete the following information.

	Additional Member	Additional Organization	Region	Segment Selection
1.	Raymond Phillips	Alabama Municipal Electric Authority	SERC	4
2.	Frank Gaffney	Florida Municipal Power Agency	FRCC	3, 4
3.	Gayle Mayo	Indiana Municipal Power Agency	RFC	4
4.	Bob Thomas	Illinois Municipal Electric Agency	RFC	4
5.	Eric Ruskamp	Lincoln Electric Systems	MRO	1, 3, 5, 6
6.	Roy Thilly	WPPI Energy	MRO	4, 5
7.				
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9) Question 2:

The Standards Committee revised the Reliability Standards Development Procedure manual to reflect the board’s October 2009 directive to modify the manual to address standards developed in response to national security emergency situations. Do you agree that the modifications made to the manual on pages 31–33 accurately support this board action? If you disagree with the accuracy of the proposed changes or if you believe additional changes should have been made, please explain in the comment area.

No

10) Question 2 Comments:

The proposed changes unnecessarily and inappropriately limit commenting on a “confidential standard” to entities that will be subject to the standard. The ability to comment on such a standard should be limited only based on whether an entity’s representative has signed or is willing to sign the relevant confidentiality agreement.

Entities that will not be subject to a proposed standard could legitimately be interested and should be allowed to comment. For example, entities that could be registered in the future for the relevant function (based on projected load

growth or other factors); entities whose member cities will be subject to a proposed standard; and entities who are registered or subject to registration for the relevant function but are not currently subject to the relevant standard because another entity is complying on their behalf pursuant to a Joint Registration Agreement would all have an interest in a proposed confidential standard.

Therefore, if an entity's representative agrees to the confidentiality restrictions required by NERC, the entity should be allowed to comment on the proposed standard, regardless of whether the entity will be subject to the standard.

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Save and Quit

Finish

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Comment Form - Reliability Standards Development Procedure

Thank you for completing the comment form for the Reliability Standards Development Procedure.

Verification Code: RSDP

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