

via e-mail to ROPcomments@nerc.net

**COMMENTS OF TRANSMISSION ACCESS POLICY STUDY GROUP ON MAY 16,
2016 POSTING OF PROPOSED NERC RULES OF PROCEDURE DEFINITION OF
SYSTEM OPERATOR**

TAPS appreciates the opportunity to comment on NERC's proposed revisions to its Rules of Procedure ("ROP") to add the defined term "System Operator" and make related changes. The proposed definition is:

an individual at a control center of a Balancing Authority, Transmission Operator, or Reliability Coordinator, who operates or directs the operation of the Bulk Electric System (BES) in real-time.**

NERC states in the Summary of the proposed changes that "[i]nclusion of the term 'System Operator' within the [ROP] will more closely align the NERC ROP with the Glossary of Terms Used in NERC Reliability Standards as approved by [FERC]." Unfortunately, while the Glossary definition of "System Operator" includes the Glossary-defined terms Control Center and Real-time, those terms are not currently defined in the ROP and thus are not capitalized in the proposed ROP definition. As a result, contrary to the proposed definition's indication (with two asterisks) that it is "taken from the NERC Glossary," the proposed ROP definition of System Operator is not identical to the Glossary definition, and in fact is significantly different.

Specifically, the use of (undefined) "control center," unlike the Glossary-defined "Control Center" used in the Glossary definition of System Operator, could be interpreted to mean, and to require NERC-certified operators for, a center that is *not* used to perform the reliability tasks of "1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations." The Glossary definition of "Control Center" therefore needs to be added to Appendix 2 of the Rules of Procedure, and the term needs to be capitalized as appropriate throughout the ROP. The only instance of "control center" (capitalized or uncapitalized) in the currently-effective ROP that we are aware of is in Appendix 5A, Section IV, Organization Certification Process, where "relocation of the control center" is one factor that can be considered in deciding whether to certify changes to an already operating and certified Registered Entity. TAPS suggests that this occurrence of the term "control center" is meant to refer to a "Control Center" as defined in the Glossary, and should accordingly be capitalized.

"Real-time" is defined in the Glossary as "[p]resent time as opposed to future time." Because this definition is not significantly different from the common understanding of the term, the use of "Real-time" versus "real-time" does not affect the System Operator definition. In order to be consistent with the NERC Glossary, however, the term should be capitalized in the System Operator definition and added to Appendix 2, and instances of "real-time" throughout the ROP

should be capitalized as appropriate. From our review, it would be reasonable to use the defined capitalized term for all but two of the occurrences of “real time” or “real-time” in the ROP; those two are in the definitions of Balancing Authority and Reliability Coordinator in Appendix 2, both of which are taken verbatim from the NERC Glossary, which does not capitalize the term.

The revised definition of System Operator would thus be:

an individual at a ~~control-center~~ Control Center of a Balancing Authority, Transmission Operator, or Reliability Coordinator, who operates or directs the operation of the Bulk Electric System (BES) in ~~real-time~~ Real-time.**