Unofficial Comment Form
Project 2015-04 Alignment of Terms

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the proposed revisions to the Glossary definitions by 8 p.m. Eastern, Monday, July 27, 2015.

Documents and information about this project are available on the project page. If you have questions, contact Standards Development, Lacey Ourso (by email) or at 404-446-2581.

Background Information
As outlined in the SAR for Project 2015-04 – Alignment of Terms, the purpose of this project is to align the defined terms found in the NERC Glossary of Terms Used in Reliability Standards (Glossary) and the Rules of Procedure (ROP). In completing this work, the SDT identified all existing defined terms that are contained in both the Glossary and the ROP (“cross-over terms”). Currently there are fifty-five (55) cross-over terms, a complete list of which can be found in Attachment 1 to the “Proposed Revisions to Align Cross-Over Terms” document. Of the fifty-five (55) cross-over terms, forty (40) contain inconsistencies or differences in the definition narratives, which causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistency between the defined terms in the Glossary and the ROP will enhance reliability by providing the owners, users and operators of the BES, as well as the ERO Enterprise, with a better understanding of the terminology used in the Glossary and the ROP. To achieve this consistency, the SDT is proposing alignment revisions to twenty-six (26) Glossary terms and sixteen (16) ROP terms.

Standard Drafting Team Work
From this complete list of cross-over terms, the team then identified those cross-over terms that contained definitional differences. After analyzing these definitional differences, the SDT identified common alignment issues and categorized the terms into different “groups” based upon the type of alignment issue identified. A summary of the groupings can be found in Part II of the “Proposed Revisions to Align Cross-Over Terms” document.

The SDT undertook substantial background research before determining whether alignment revisions were appropriate for each of the cross-over terms under consideration, including an examination of the history of the term’s definition, previous drafting teams’ intent, relevant NERC filings to FERC, and any FERC orders approving the term’s definition. Additionally, the SDT examined how each term is used in the Glossary, Reliability Standards, and ROP provisions. Based on this thorough examination, the SDT determined whether revisions were appropriate. In some instances, the SDT concluded that alignment

1 Additionally, once the definition revisions are made, the standards drafting team (SDT) will also develop recommendations regarding how to enhance the current definition development processes in the Standards Process Manual and ROP to prevent misalignment or inconsistencies during future development of defined terms.
revisions were not appropriate due to differing application of the terms in the Glossary and/or ROP. A complete summary of the SDT research, assessment and proposed revision for each term can be found in the “Proposed Revisions to Align Cross-Over Terms” document. Attachment 1 to that document provides a complete listing of all cross-over terms. Attachment 2 contains a summary of all alignment revisions proposed by the SDT.

Commenting
A 45-day formal comment for the proposed Glossary revisions is open through 8 p.m. Eastern, Monday, July 27, 2015. Ballot pools for each of the 26 Glossary terms under revision are being formed through 8 p.m. Eastern, Monday, July 13, 2015. Note that a separate ballot pool is being formed for each of the 26 Glossary terms under revision. A 10-day initial ballot for each of the proposed Glossary terms will be conducted July 17-27, 2015.

Because there are separate and distinct processes for revising Glossary terms and ROP terms, the commenting for the Glossary and ROP will be conducted separately. However, the 45-day comment periods will run simultaneously because the proposed revisions to the Glossary and ROP are inextricably linked. Full details regarding how to participate in the Glossary and ROP revision processes are provided below. For any questions related to the commenting and balloting for this project, please contact Lacey Ourso.

Commenting and ballot for Proposed Revisions to the Glossary Definitions
The Glossary definition revision process is governed by the Standards Process Manual (see, Section 5). The definition development process, for the most part, mirrors the process for standards development. The drafting team is posting proposed revisions to 26 existing Glossary definitions for an initial 45-day comment and 10-day ballot period. The 45-day Glossary comment period is June 12, 2015 through 8 p.m. Eastern, Monday, July 27, 2015. There is one comment form for all 26 proposed Glossary term revisions. Ballot pool formation for the Glossary revisions is June 12, 2015 through 8 p.m. Eastern, Monday, July 13, 2015. Each Glossary definition will be balloted separately, so registration is required for each. As noted above, there will only be one comment form for all the proposed revisions, but individual ballot pools must be created for each definition under revision. The 10-day ballot period for each proposed Glossary definition revision will be July 17, 2015 through 8 p.m. Eastern, Monday, July 27, 2015. Note that the proposed ROP revisions are being posted for a 45-day comment period simultaneous with the proposed Glossary revisions. Below are details on how to comment and participate in the ROP revision process.

---

2 Also, for a number of terms, the SDT identified areas where the definition language could be improved, given industry usage. For such terms, the SDT will develop a Standards Authorization Request (SAR) outlining the identified issues, and the team’s proposal for how to address each issue.
Commenting for Proposed Revisions to Appendix 2 of the Rules of Procedure

The ROP revision process is governed by Section 1400 of the ROP, and these revisions are being proposed by the Standards Committee pursuant to those provisions. Under the revision process, NERC must provide public notice and opportunity for comment regarding proposed revisions to the ROP. There is no ballot requirement, and thus, no ballot pool formation. Participation in the commenting process is open to all persons who are directly and materially affected by the reliability of the North American Bulk Power System. A detailed overview of the proposed ROP revisions can be found in the “Proposed Revisions to Align Cross-Over Terms” document. You may submit comments regarding the proposed ROP revisions by going to the ROP webpage on the NERC website, or by clicking here. The 45-day comment period will be June 12, 2015 through 8 p.m. Eastern, Monday, July 27, 2015. At the conclusion of the 45-day comment period, NERC staff, along with the drafting team, will review the comments received. All comments will be considered, and a proposal will be made to the NERC Board of Trustees based upon the comments received. The Board will then vote on the proposed revisions. If adopted by the Board, the proposed revisions will be presented to FERC for approval.

Questions

1. **Term 4: Blackstart Resource (redline)**

   **Blackstart Resource**: A generating unit(s) and its associated set of equipment which has the ability to be started without support from the System or is designed to remain energized without connection to the remainder of the System, with the ability to energize a bus, meeting the Transmission Operator’s restoration plan needs for real, Reactive Power, Power capability, frequency and voltage control, and that has been included in the Transmission Operator’s restoration plan.

   The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “Real Power” and “Reactive Power” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

   **Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

   ![Yes](Yes) ![No](No)

   **Comments**: We agree with the consistency revisions proposed, but the need to capture the restoration needs and obligations of Reliability Coordinators under EOP-006-2 must be addressed. Suggest that the SDT add “and Reliability Coordinator’s” after each of the
“Transmission Operator’s” to reflect that, in EOP-006-2, the RC’s restoration plan also requires the utilization of Blackstart Resources. Also, the second part of the definition pertains to a generating unit that “is designed to remain energized without connection to the remainder of the System.” We suggest that the SDT consider deleting this aspect of the definition due to the fact that although such a generating unit could be utilized for system restoration, it would not (indeed, could not) be classified in advance as a Blackstart Resource within the restoration plan (i.e., there is no guarantee that the unit would be operating at the time of the disturbance).

2. Term 6: Bulk-Power System (redline)

Bulk- Power System:
(A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and
(B) electric energy from generation facilities needed to maintain transmission system reliability.

The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1], defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.

The SDT is proposing revisions to both the Glossary and ROP definition in order to align the two terms and maintain consistency with the Federal Power Act. Both the ROP and Glossary definitions have been approved by FERC (See, Glossary: FERC Order; and ROP: FERC Order on Compliance Filing, FERC Order Approving Amendments to the ROP). However, there are a number of differences, mostly minor, in the two definitions. The different language may be perceived to mean that the terms are intended to have different meanings, when this is not the case. There is no reason for the terms to have differing definitions, as both terms are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The SDT revisions align the terms by eliminating the unnecessary differences.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes  ☒ No

Comments: For consistency with federal documents, Bulk-Power System (with the hyphen) should be used in all documents where appropriate. For NERC documents, capitalization should be consistent. If, for example, Facilities is capitalized in the Glossary, then Facilities should be capitalized in the RoP regardless of how they are shown in federal documents.
3. Term 7: Cascading (redline)

Cascading:
The uncontrolled successive loss of *system* *System elements* *Elements* triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “System” and “Elements” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

**Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

☐ Yes
☒ No

**Comments:** Introducing the defined terms for System and Elements makes the definition for Cascading incoherent. The Glossary defines System as a "A combination of generation, transmission, and distribution components." and Element as "Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components." Both System and Element are composed of components. The System components are Elements, and components of Elements are make up the Element. The definition proposed for Cascading starts with "The uncontrolled successive loss of System Elements triggered by an incident at any location." The use of System Elements is redundant. System should be replaced with Bulk Electric System, or otherwise should not be capitalized.

Suggest adding the word “local” before the word “area.” Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents, within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.
4. Term 13: Distribution Provider (redline)

   Distribution Provider:
   Provides and operates the “wires” between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the Distribution distribution function at any voltage.

   The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Distribution” because it is not a defined term in Glossary (or the ROP).

   Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

   ☒ Yes
   ☐ No

   Comments:

5. Term 14: Element (redline)

   Element:
   Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element Element may be comprised of one or more components.

   The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Element” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

   Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

   ☒ Yes
   ☐ No

   Comments:

6. Term 17: Generator Operator (redline)
Generator Operator:
The entity that operates generating Facility(ies) unit(s) and performs the functions of supplying energy and Interconnected Operations Services.

The SDT is proposing to revise the Glossary definition to align with the ROP. This is because the term “unit” (used in the current Glossary definition) is not a NERC defined term, and thus introduces the possibility of inconsistent use or application of the definition. The ROP definition provides greater clarity because it uses the term “Facility(ies),” which is defined by NERC as, “a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).” \(^3\) (See also, NERC Limited Answer to RBR Comments, pp. 6-7: “Finally, NERC’s proposed changes to the definitions of “Generator Owner” and “Generator Operator” which include replacing the undefined term “generating units” with the term “Facilities,” are appropriate. The term “Facilities” is defined in the NERC Glossary as a Bulk Electric System element, which ties in directly to the new BES definition. Use of the term “Facilities” has allowed NERC to eliminate the Part III threshold criteria and use the new Bulk Electric System core definition, inclusions and exclusions to identify Bulk Electric System generator assets.”)

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: Considering the definition of Facility listed in the Glossary, a TOP operating a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as operating a “generating Facility”. Would the TOP therefore be under an obligation to register as a GOP? Even though Footnote 3 on page 6 preceding mentions that “the clarity and content of the current definition could be improved”, and a SAR will be drafted, this should be taken care of now under this project.

7. Term 18: Generator Owner (redline)

Generator Owner:
Entity that owns and maintains generating Facility(ies) unit(s).

\(^3\) Additionally, the SDT notes that during the course of its work on this project, the team reviewed and assessed the quality of the definition of “Facility.” The SDT believes the clarity and content of the current definition could be improved. As a result, the SDT will draft a SAR proposing to revise the definition in order to address the issues identified by the SDT.
The SDT is proposing to revise the Glossary definition to align with the ROP. This is because the term “unit” (used in the current Glossary definition) is not a NERC defined term, and thus introduces the possibility of inconsistent use or application of the definition. The ROP definition provides greater clarity because it uses the term “Facility(ies),” which is defined by NERC as, “a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).” ⁴ (See also, NERC Limited Answer to RBR Comments, pp. 6-7: “Finally, NERC’s proposed changes to the definitions of “Generator Owner” and “Generator Operator” which include replacing the undefined term “generating units” with the term “Facilities,” are appropriate. The term “Facilities” is defined in the NERC Glossary as a Bulk Electric System element, which ties in directly to the new BES definition. Use of the term “Facilities” has allowed NERC to eliminate the Part III threshold criteria and use the new Bulk Electric System core definition, inclusions and exclusions to identify Bulk Electric System generator assets.”)

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes  ☒ No

Comments: Considering the definition of Facility given in the Glossary, a TO owning a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as owning a “generating Facility”. Would the TO, therefore, be under an obligation to register as a GO? Even though Footnote 4 on page 7 preceding mentions that “the clarity and content of the current definition could be improved”, and a SAR will be drafted, this should be taken care of now under this project.

8. Term 20: Interchange Authority (redline)

Interchange Authority:
The responsible entity that authorizes the implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures communication of Interchange information for reliability assessment purposes.

⁴ Additionally, the SDT notes that during the course of its work on this project, the team reviewed and assessed the quality of the definition of “Facility.” The SDT believes the clarity and content of the current definition could be improved. As a result, the SDT will draft a SAR proposing to revise the definition in order to address the issues identified by the SDT.
The SDT is recommending errata changes to both the Glossary and ROP definitions, as follows:

1. For the Glossary, add the word “the” to align with the ROP definition.
2. For the ROP, remove the “s” from “communications” to align with the Glossary definition.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

- Yes
- No

Comments: Regarding communication, suggest revising the definition to read:
The responsible entity that authorizes the implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures the communication of Interchange information for reliability assessment purposes.

“Interchange Coordinator” would be more a more consistent title to be used with the definition. A “Coordinator” can authorize. We recognize that this is a substantive change that must be addressed.

9. Term 24: Interconnected Operations Service (redline)

Interconnected Operations Service:
A service (exclusive of basic energy and transmission services) that is required to support the reliable operation of interconnected Bulk Electric Systems.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “Transmission Services” and “Reliable Operation” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

- Yes
- No

Comments:

10. Term 25: Interconnection (redline)
Interconnection:
A geographic area in which the operation of Bulk Power System components is synchronized such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system to maintain Reliable Operation of the Facilities within their control. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.

The SDT is proposing revisions to both the Glossary and ROP definitions (effective no earlier than July 1, 2016). The ROP definition is broader than the Glossary because it provides a description of what constitutes an interconnection, as opposed to identifying the specific geographical areas in North America that currently constitute an interconnection. The ROP definition tracks the Federal Power Act (note it is marked with ++ indicating such). Because the Glossary limits application of the definition to the specific interconnections identified therein, it could be perceived as intended to be more limiting and/or intentionally different than the ROP definition. In order to align the two definitions, without losing the clarity provided by the FERC-approved Glossary definition, which specifically identifies the current Interconnections in North America, the SDT is proposing to combine the two definitions. However, because the recently FERC-approved Glossary definition is not effective until July 1, 2016, the SDT is proposing that the alignment revisions do not take effect until July 1, 2016, at the earliest.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: The Glossary definition should align with the RoP; however, “system” should be changed to “Bulk Power System”:

“Interconnection” means a geographic area in which the operation of Bulk Power System components is synchronized such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system Bulk Power System to maintain Reliable Operation of the Facilities within their control...

Concerned with the phrasing “When capitalized...” When defined terms are used in Reliability Standards, they are capitalized as an indication that the term is defined in the Glossary of Terms. By utilizing the caveat that the definition is specific “when capitalized” it could only ever be defined as “…any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec” in a Reliability Standard. Otherwise it would not be capitalized and therefore an undefined term in the Reliability Standard. Suggest removing “When capitalized” and identify specifically or rely on context when the four major electric system networks in North America are intended.
We agree with the first part of the proposed addition to clarify the synchronized operation as a defining characteristic of an Interconnection, but do not support the additional qualifiers regarding failures and reliable operation. The additional language could be read as creating one all-inclusive interconnection because, for example, the failure of one component in the Quebec Interconnection may have adverse effects in the Eastern Interconnection.

11. Term 28: Load-Serving Entity (redline)

**Load-Serving Entity:**
Secures energy and transmission service (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Transmission Service” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

**Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

☐ Yes
☐ No

Comments:

12. Term 31: Planning Authority (redline)

**Planning Authority:**
The responsible entity that coordinates and integrates transmission facility, facilities and service plans, resource plans, and protection systems.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “Facilities” and “Protection Systems” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.
Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: Transmission should be capitalized. Transmission Facilities should be uniquely defined. The definitions of Transmission and Facility(ies) should not have to be merged by a reader to create the Transmission Facilities definition.

13. Term 33: Point of Receipt (redline)

Point of Receipt:
A location that the Transmission Service Provider specifies on its transmission system where an Interchange Transaction enters or a Generator delivers its output.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Generator” because it is not a defined term in Glossary or the ROP.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: Transmission System should be capitalized. Transmission System should be uniquely defined. The definitions of Transmission and System should not have to be merged by a reader to create the Transmission System definition.

14. Term 36: Reactive Power (redline)

Reactive Power:
The portion of electricity that establishes and sustains the electric and magnetic fields of alternating-current equipment. Reactive Power must be supplied to most types of magnetic equipment, such as motors and transformers. It also must supply the reactive losses on transmission facilities. Reactive Power is provided by generators, synchronous condensers, or electrostatic equipment such as capacitors
and directly influences electric system voltage. It is usually expressed in kilovars (kvar) or megavars (Mvar).

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Power” because “Reactive Power” is a defined term and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes  ☒ No

Comments: Transmission Facilities should be capitalized. Transmission Facilities should be uniquely defined. The definitions of Transmission and Facility(ies) should not have to be merged by a reader to create the Transmission Facilities definition.

Should the “k” in kvar be capitalized?

15. Term 37: Real Power (redline)

Real Power:
The portion of electricity that supplies energy to the load.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “load” in the Glossary because it is a defined term and its usage in this definition narrative is intended to have the meaning of the defined term. In the definition narrative of Real Power, use of the word load is intended to mean an end-use device or customer.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☒ Yes  ☐ No

Comments:

16. Term 38: Reliability Coordinator (redline)

Reliability Coordinator:
The entity that is the highest level of authority who is responsible for the **Reliable Operation** of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator’s vision.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Reliable Operation” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

**Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

☐ Yes
☒ No

**Comments:** Transmission Systems should be capitalized because both are terms defined in the NERC Glossary. Real-time should be capitalized.

**17. Term 40: Reliability Standard (redline)**

**Reliability Standard:**
A requirement, approved by the United States Federal Energy Regulatory Commission under this Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk- Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk- Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk- Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

The SDT is proposing revisions to the FERC-approved Glossary definition to clarify that defined terms contained in the definition narrative are not capitalized in order to maintain consistency with the Federal Power Act.
Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: There is the note in the definition of Bulk Power System (Question 2) that defined terms are not capitalized to be consistent with the Federal Power Act. In this definition, that same note is made, yet terms in capitals are added in brackets. There should be consistency.

The definition of Reliability Standard in the NERC Glossary is significantly different from that in the Rules of Procedure. We recognize that this is a substantive change that must be addressed.

18. Term 41: Reliable Operation (redline)

Reliable Operation:
Operating the elements of the bulk-power system [Bulk Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

The SDT is proposing revisions to the FERC-approved Glossary definition to clarify that defined terms contained in the definition narrative are not capitalized in order to maintain consistency with the Federal Power Act.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: There is the note in the definition of Bulk Power System (Question 2) that defined terms are not capitalized to be consistent with the Federal Power Act. In this definition, that same note is made, yet terms in capitals are added in brackets. There should be consistency.
Cyber Security Incident should be capitalized and the words Cyber and Security should be separated as they are in the Glossary.

19. Term 42: Reserve Sharing Group (redline)

Reserve Sharing Group:
A group whose members consist of two or more Balancing Authorities that collectively maintain, allocate, and supply operating reserves required for each Balancing Authority’s use in recovering from contingencies within the group. Scheduling energy from an Adjacent Balancing Authority to aid recovery need not constitute reserve sharing provided the transaction is ramped in over a period the supplying party could reasonably be expected to load generation in (e.g., ten minutes). If the transaction is ramped in quicker (e.g., between zero and ten minutes) then, for the purposes of Disturbance Control Performance, the Areas become a Reserve Sharing Group.

The SDT is recommending changes to both the Glossary and ROP definitions. Specifically, the SDT is proposing to revise the Glossary definition by removing the capitalization for the terms “Disturbance Control Performance” and “Area” because these are not defined terms. (Note that Disturbance Control Standard and Disturbance are both defined terms). Also, in the ROP definition, the SDT is proposing removal of the unnecessary commas to align with the Glossary definition.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☐ No

Comments: Disturbance should be capitalized because it is a defined term in the NERC Glossary.

20. Term 43: Resource Planner (redline)

Resource Planner:
The entity that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority Area.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Area” because it is not a defined term in Glossary or the ROP.
Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: Loads should be capitalized.

21. Term 48: System Operating Limit (redline)

System Operating Limit:
The value (such as MW, MVar, Amp, Frequency, or Volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:

- Facility Ratings (Applicable pre- and post-Contingency)
- Transient Stability Ratings (Applicable pre- and post-Contingency)
- Voltage Stability Limits (Applicable pre- and post-Contingency)

The SDT is proposing revisions to the Glossary definition. Specifically, the SDT is proposing to revise the Glossary definition to lowercase those terms that are not defined terms, and thus, should not be capitalized in the definition narrative.

Do you agree with the proposed Glossary definition revisions? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: “Facility Ratings” and “Equipment Ratings” should be capitalized in the Rules of Procedure to match the Glossary.

22. Term 49: Transmission Customer (redline)
Transmission Customer:
1. Any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.
2. Any of the following responsible entities: Generator Owner, Load-Serving Entity, or Purchasing-Selling Entity.

The SDT is recommending the following changes:
(1) Revise the Glossary definition to capitalize the term “Transmission Service” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.
(2) Remove the word “responsible” to align with the ROP definition. The word “responsible” was originally included in the ROP definition, but was recently removed by the Risk-Based Registration project. The Glossary should be updated to reflect these recent changes.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes  ☐ No

Comments:

23. Term 50: Transmission Operator (redline)

Transmission Operator:
The entity responsible for the reliability of its “local” transmission system, and that operates or directs the operations of the transmission facilities.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Facilities” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes  ☒ No

Comments: In addition to Facilities, Transmission should be capitalized.
Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.

24. Term 51: Transmission Owner (redline)

Transmission Owner:
The entity that owns and maintains transmission facilities.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Facilities” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes
☒ No

Comments: Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.

25. Term 52: Transmission Planner (redline)

Transmission Planner:
The entity that develops a long-term (generally one year and beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion of the Planning Authority area.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Area” because it is not a defined term in Glossary or the ROP.
Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☐ Yes  ☒ No

Comments: Transmission Systems should be capitalized. Both are defined terms in the NERC Glossary. Transmission System should be uniquely defined. The definitions of Transmission and System should not have to be merged by a reader to create the Transmission System definition.

26. Term 54: Transmission Service Provider (redline)

Transmission Service Provider:
The entity that administers the transmission tariff and provides Transmission Service to Transmission Customers under applicable Transmission service agreements.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Transmission Service” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

☒ Yes  ☐ No

Comments:

27. If you have additional comments on the proposed revisions to the Glossary definitions that you have not provided in your above responses, please provide them here:

☒ Yes  ☐ No

Comments: Is there a NERC endorsed consistent format for capitalization when you have a term that is made up of several words, and is not defined in the NERC Glossary, but some of the words are defined? For example, in PRC-002-2 Disturbance Monitoring and Reporting Requirements, the Standard uses the term dynamic Disturbance recording. Only Disturbance is capitalized because it is the only word in the NERC Glossary.
This Comment Form is asking for input on the alignment of the terms in the NERC Glossary and the RoP. To ensure a comprehensive comparison and review, why aren’t all the terms listed in the Proposed Revisions to Appendix 2 of the Rules of Procedure - Project 2015-04 Alignment of Terms included in this Comment Form?

The term ‘Reliable Operation’ must be also capitalized in the definition of ‘Frequency Response Obligation’; ‘Interconnected Operations Service’ or archive terms such as ‘Frequency Bias Setting’ 2005; ‘Overlap Regulation Service’.