Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Unofficial Standard Comment Form

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the Standard. The electronic comment form must be completed by 8 p.m. ET **August 2, 2012**.

If you have questions please contact David Taylor at [David.Taylor@nerc.net](mailto:David.Taylor@nerc.net) or by telephone at 202-644-8089.

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**Background Information**

This posting is soliciting formal comment.

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> “1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary.”

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation are contained in the Electricity Modernization Act of 2005. Inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address three outstanding Commission directives.

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation contained in the Electricity Modernization Act of 2005 were previously submitted by NERC in a petition to FERC,
dated November 29, 2011. The petition requested approval of numerous revisions to NERC’s Rules of Procedure (ROP); including, but not limited to, a new Appendix 2 to the ROP, Definitions Used in the Rules of Procedure. On January 31, 2012, the Commission issued an Order approving NERC’s November 29, 2011 request.

The proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation are identical to the definitions approved by the Commission in their January 31, 2012 Order and are responsive to the Commission’s directives from Paragraph 1894 of Order 693. Approval of the proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation also ensures both the NERC Glossary of Terms used in Reliability Standards and the NERC ROP contain consistent (identical) definitions for these terms.

The following definitions are proposed to be added to the NERC Glossary of Terms used in Reliability Standards in order to comply with the FERC directives in Paragraph 1894 of Order 693:

- **“Bulk Power System”** means, depending on the context: (i) Facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- **“Reliability Standard”** means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.

- **“Reliable Operation”** means operating the Elements of the 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 Cyber Security Incident, or unanticipated failure of system Elements.
As the proposed definitions for Bulk Power System, Reliable Operation, and Reliability Standard are the statutory definitions for these terms contained in the Electricity Modernization Act of 2005 and are identical to the definitions approved by the Commission in their January 31, 2012 Order, NERC is proposing to make no modifications to the statutory definitions already approved in the ROP. The outstanding FERC directive requires...“the ERO to modify the glossary through the Reliability Standards development process.”

On May 10, 2012, the Standards Committee (SC) authorized posting the Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards for a 45-day formal comment period, with an initial ballot during the final 10 days of that comment period.

Enter All Comments in Simple Text Format. Bullets, numbers, and special formatting will not be retained.

Do you have any comments regarding the inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards?

☐ Yes
☐ No

Comments: There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word “necessary” is also used in the definition. The use of the term "necessary" can be left to interpretation. What “Facilities and control systems...” are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but because of the system configuration does not increase system reliability pre and post contingency. What is meant by “depending on the context”? This implies that there are multiple definitions of “Bulk Power System”. What are they?