

April 20, 2007

Comments on the Posted Draft A-8, B-22, and C-32 Documents

The Independent Electricity System Operator (IESO) offers the following comments on the posted draft of the subject NPCC Documents.

A-8 Document

1. Section 3.2: "...if a participant is not a member of NPCC Inc., the Area may disclose the name the participant responsible for the violation if the Area is allowed to do so". It is not clear to us who allows the Area to do so. Please specify.
2. Section 3.2: "...shall disclose the name the participant responsible..." should be changed to "...shall disclose the name **of** the participant responsible..." (in two locations in the paragraph)
3. Section 4.3: Last paragraph, the term "EC" should be changed to "BOD".
4. Section 4.4: The title should be changed to Board of Directors (BOD).
5. Section 4.6: "...All costs incurred by each of the NPCC Inc. and the Disputing Area in connection with such an appeal to appropriate Governmental Authority shall be solely the responsibility of the party that incurred such costs." It is not clear who "the party" is. Does it mean "these parties", i.e., the NPCC Inc. and the Disputing Area?
6. Section 5.1: May consider removing "...standard and..." from the first sentence since the compliance templates for NERC standards have been removed.
7. Appendix A: Suggest adding a title to this Appendix, for example: "Compliance Templates".
8. Compliance Template for A3-1:
 - a. There is no sanction assigned to amount of load shedding less than 100% but more than 95% of the Area's requirement in any of the load steps. Should this range also be assigned a non-compliance level?
 - b. Levels 2 and 3: suggest putting in a range rather than simply stating "less than 95%" and "less than 90%".

B-22 Document

1. Section 3.1: "...compliance is confirmed when the either the Area..." should be replaced by "...compliance is confirmed when either the **Area**..." (Removal of an extra "the" and bold font for the word: Area)
2. Section 3.1.3, second paragraph: The scenario where the RCC determination of a compliance violation is undisputed but the associated sanction, if any, being disputed is not present – this paragraph should be consistent with section dealing with similar material from the A-8 document (section 4.3, second paragraph).
3. Section 3.1.3, last paragraph: Mentions of "the FERC or applicable Canadian Regulatory Authority" should be replaced by "applicable Governmental Authority" to be consistent to the A-8 document (section 4.6).
4. Section 3.14 "Once the violation determination process is completed the violation event will be posted in the NPCC Inc." should be changed to "Once the violation determination process is complete the violation ~~event~~ and the name of the violator(s) will be posted on the NPCC Inc Web site."
5. Section 3.2 1 Reporting and Disclosure 1st paragraph; Suggest that this 1st paragraph be retained and NPCC Inc. consider inclusion of NPCC Inc. disclosure policy in place of what has been deleted.
6. Section 4.0: The last paragraph appears to be open-ended – shouldn't there be a timeframe by which NPCC Inc. would publish the annual compliance schedule for the upcoming year?

C-32 Document

The IESO does not have any comments on this document.

Thank you for your attention to our comments and recommendations. In addition to this transmittal, the comments have also being posted on the NPCC Open-Process website.

Yours truly,



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