

**Project QC-2014-01
Responses to comments received during the first consultation period**

This document provides a summary of the comments presented by the entities, as they were received and in the language used by them during the first consultation period concerning Project QC-2014-01.

The comments from Shell Energy North America (Canada) Inc. ("Shell Energy") were presented in English.

Document concerned	Section concerned	Comment	Entity	Accepted	Response from reliability coordinator
IRO-005-3.1a	1. Assessment of Relevance and 4. Applicability	<p>Shell Energy objects to the inclusion of Purchasing-Selling Entity in the IRO-005 standard. This standard is not relevant to the activity of PSEs in Quebec (or elsewhere) and not suitable for adoption in Quebec. The currently approved standard suggests that PSEs play a role in determining system operating limits and in operating the system to such limits. This is not true. PSEs have no authority or influence in establishing such limits and do not operate the system. Rather, a PSE is subject to the actions, including curtailment of transactions, of the entities with such authority. Shell Energy recommends amending the standard to remove applicability to PSEs and their removal from Requirement 10 and Measurement 10.</p> <p>NERC has recognized the error in the current standard for many years, but unfortunately the old standard remains currently effective. This error has been agreed by NERC and participants and addressed, as applicability to PSEs was removed under Project 2006-06 (link) amending many of the IRO and TOP standards. NERC is re-assessing some of these changes as requested by FERC under Project 2014-03 (link) however, the removal of the PSE applicability is not under review and will not change.</p> <p>Regardless of the NERC process to remove applicability, the "Assessment of Relevance" performed by TransEnergie should have concluded that the current version of IRO-005 is not relevant and not suitable for adoption in Quebec as it relates to PSEs. Including PSEs in the standard does not support the reliable operation of the electrical system in Quebec. If the standard is adopted as proposed, TransEnergie should not implement any requirements, including self-certification, in their Compliance Monitoring and Enforcement Program (CMEP) for PSEs related to this standard.</p> <p>http://www.nerc.com/pa/stand/pages/relaibilitycoordinationproject20066.aspx http://www.nerc.com/pa/stand/pages/project-2014-03-revisions-to-top-and-iro-standards.aspx</p>	Shell Energy		<p>The Reliability Coordinator agrees with your comment regarding the role of the purchasing-selling entity. The purchasing-selling entity does not operate the system contrary to what is suggested by requirement R10.</p> <p>Quebec appendix (QC-IRO-005-3.1a) will be modified in order to remove the purchasing-selling entities from the "Applicability" section of the standard.</p>
EOP-005-2 EOP-006-2	6. Effective Proposed Dates	The proposed effective date should be the first day of the calendar year since the training programs established under requirements R11 (EOP-005) and R10 (EOP-006) must be based on calendar years. Compliance with these requirements must also be evaluated on a calendar years basis.	Reliability Coordinator		Proposed effective dates will be modified to correspond to the first day of the calendar year following the adoption of the standard by the Régie.