

Utility Services, Inc.

To Whom it may concern:

Utility Services appreciates the opportunity to comment on the latest revision to the 2021 NERC Business Plan and Budget. In reviewing the Second Draft of the 2021 NERC Business Plan and Budget, Utility Services wishes to inquire about and make comment on certain aspects of the proposal. The first inquiry is in regards to the following section, highlighting the work scope outlined for the NERC PRISM group:

In support of Focus Areas 1, 2, and 4 of the *ERO Enterprise Long-Term Strategy*, key efforts underway for the PRISM group include:

- Completing NERC position documents for Distributed Energy Resources (DER), Interconnection Reliability Operating Limits (IROL) and System Operating Limits (SOL), and Battery Storage;
- Developing statistical analysis around misoperations data to identify trends and discrete areas for improvement;
- Developing statistical analysis around balancing (BAL) standards and the effects of frequency response within the four interconnections; and
- Conducting Reliability Standards training for NERC staff to enable consistent understandings.
- Launch of the cross cutting tool, wEROck discussed above; and
- Measuring the effectiveness of the recently approved Electric Gas Working Group (EGWG) industry guideline on fuel assurance. Appropriate measurement and determination of the efficacy of this guideline will be a key driver in a potential fuel assurance standard.

In this particular section, first of all, Utility Services agrees with the bullet measuring the effectiveness of the recent EGWG reliability guideline on fuel assurance. The EGWG is working to bring forward a “follow up and follow-through” plan to raise awareness and education to respective teams responsible for resource adequacy. The Reliability Guideline is a follow up on the NERC Special Assessment on Natural Gas Disruptions and highlights how control areas, systems, or any planning body can take into consideration fuel and resource limitations when examining adequacy. It will be important for NERC and the EGWG to monitor and training, and then measure the benefits from the Reliability Guideline effort.

Second, in the first bullet, NERC PRISM indicates that there is ongoing and continuing work on a few subject areas like DER, IROL/SOL, and Battery Storage. As there are technical committees working particularly hard on these topics, we question what work is being contemplated and or possibly assessed within PRISM. The SPIDERWG and IRPTF are investing significant time commitments and efforts to bring forward to the industry several documents and proposals on these subject areas for industry consideration. How does the NERC PRISM efforts complement rather than duplicate those efforts?

Third, we note the bullet that states that the NERC PRISM group is planning to conduct standards training. This seems like an odd placement for this effort and seems to be in conflict with other areas of the NERC, e.g. CMEP and Standards. Can you elaborate on what the training is for and how it will be impacting the industry?

Lastly on this section, we note that NERC PRISM is requesting the launching of another software tool named “wERock”. This appears to be the first time where this tool is being promoted. How does the development of this tool fit into the rest of the development of NERC software tools, like CORES, Align, and SEL, as well as the maintenance services for other tools like BESnet, ERO Portal, SBS, etc? It appears to be outside of those efforts, but which entity is going to be doing the system design, implementation, and development work? How does the cost fit into the rest of the NERC software development budget, in light of the recent additional approval for added expenditures? We note the following language from the Business Plan on wERock:

Tools and Technology

The main tool used by the Reliability Standards program is NERC’s Standards Balloting and Commenting System (SBS). This system provides a seamless user interface for balloting and submitting comments on Reliability Standards under development. NERC’s annual budget accounts for ongoing maintenance and any necessary enhancements for this system. Additionally, the PRISM group is working to launch a cross cutting tool, wERock, which will serve as a repository to track RISC-identified issues as well as work plan items from all NERC stakeholder committees as well as Regional Entity committees and subcommittees.

In Part 2 of our comments, we note the following section in the Business Plan:

Future Plans

In 2022 and beyond, as emerging technologies that are interconnected at scale continue to provide challenges and uncertainties to BPS reliability, standards alignment with the effects of these technologies is critical. This includes battery storage, DER, the proliferation of electric vehicles, cyber implications on system design, operations, and restoration, and systemic risks from interdependencies among gas, electric, and communications systems. NERC has access to increasing amounts of data that must be leveraged to quantitatively determine the efficacy of standards with respect to these emerging risks, and must continually evaluate approaches to ensure that standards are developed appropriately with respect to the commensurate cross-cutting influence and expertise available.

It states that “NERC has access to increasing amounts of data that must be leveraged....” What data is NERC planning to use and leverage? How will NERC seek permission to use data for these purposes when such data was not gathered for these purposes? To use any industry data and or information without the consent or authorization by the entities creates a strong apprehension to providing data in the future, especially if the data points will be used for purposes beyond its original intention. Further as we have learned in other exercises, Misuse of data can establish misrepresentations or situations of mischaracterization when applied in other forums than its intended use. Recently, we discovered that use of the NERC LTRA report has been used in other forums to represent conditions outside of the intent of the LTRA. It would be very inappropriate to use data for which it was not intended or accepted by the industry entities.

Thank you and we look forward to hearing your responses.