

## Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information			
SAR Title:	Operational Data Exchange Simplification		
Date Submitted:	June 23, 2020 <u>(Revised on March 16, 2022)</u>		
SAR Requester			
Name:	Standards Efficiency Review Phase 2 Team (Michael Cruz-Montes) <u>(Revised by Project 2021-06 SAR Drafting Team)</u>		
Organization:	CenterPoint Energy		
Telephone:	713-207-2132	Email:	michael.cruz-montes@centerpointenergy.com
SAR Type (Check as many as apply)			
<input type="checkbox"/> New Standard	<input type="checkbox"/> Imminent Action/ Confidential Issue (SPM Section 10)		
<input checked="" type="checkbox"/> Revision to Existing Standard	<input type="checkbox"/> Variance development or revision		
<input checked="" type="checkbox"/> Add, Modify or Retire a Glossary Term	<input checked="" type="checkbox"/> Other (Please specify)		
<input checked="" type="checkbox"/> Withdraw/retire an Existing Standard			
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
<input type="checkbox"/> Regulatory Initiation	<input type="checkbox"/> NERC Standing Committee Identified		
<input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/> Enhanced Periodic Review Initiated		
<input type="checkbox"/> Reliability Standard Development Plan	<input checked="" type="checkbox"/> Industry Stakeholder Identified		
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
The proposed project will enhance the effective and efficient administration of operational data exchanges between Responsible Entities essential for safe, secure and reliable operations.			
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):			
The primary purpose of this project is to simplify administrative burdens identified by the SER Phase 2 Team associated with the current IR0-010- <del>43</del> and TOP-003- <del>54</del> standards and limit unnecessary data retention requirements that do not contribute to BES reliability and resiliency. As written the standards may create a zero-defect expectation for each Registered Entity receiving a data specification to demonstrate perfect performance on every item in the data specification for an entire audit period. This can result in unnecessary administrative burdens for the Registered Entity to demonstrate compliance,			

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including excessive data retention. If instead a risk-based approach was developed and performance was triggered upon an event or unresolved data conflicts between entities, then the purpose of the standards would be achieved in an effective and efficient manner.

Therefore, the industry would benefit from continuing the efforts of Project 2014-03 and further revising IRO-010-~~43~~ and TOP-003-~~54~~ to enhance the “data specification” approach to reduce the administrative burdens of excessive data retention, while ensuring Registered Entities with operational responsibilities continue, as under the current standards, to request and receive the data necessary to support the four tasks identified in IRO-010-~~34~~ and TOP-003-~~54~~ (and described in the Detailed Description section below), while protecting public disclosure of commercially sensitive information and providing a dispute resolution process. To preserve the “data specification” concept, flexibility for differences in operational environments and emerging technology must be maintained. Therefore, creating a minimum list of items to include in a data specification is not desired. However, more clarity regarding the scope of the four tasks identified in IRO-010-~~43~~ and TOP-003-~~54~~ would be beneficial and is desired. The scope of the data specification would then just reflect the information necessary to cover the scope of the applicable tasks identified in IRO-010-~~43~~ or TOP-003-~~54~~ for the individual Registered Entity. The SER Phase 2 team received some feedback from industry participants who believe the scope of a data specification would only contain routine real time operating data typically provided systematically from field devices via SCADA/ICCP. Therefore, it is also necessary to clarify for industry if it should contain other data/information and methods of transfer such as phone, instant messaging, internet-based systems, etc.

A secondary purpose of this project is to evaluate removing other data exchange requirements dispersed in other standards. The drafting team would need to evaluate those requirements after proposed changes to the IRO-010 and TOP-003 are developed to determine if they are within the scope of the four tasks and consequently within the scope of IRO-010 and TOP-003. This may require enhancing the standards to allow each Registered Entity with responsibilities to perform the tasks identified in IRO-010-~~43~~ and TOP-003-~~45~~ the ability to request and receive any information it needs from other Registered Entities to perform those tasks. The intent of the project is not to do away with specific requirements in other Reliability Standards under the assumption that the same data will be requested per a data exchange under IRO-010-~~43~~ and TOP-003-~~54~~; and the Standard Drafting Team should evaluate any potential reliability risk incurred by removing a perceived redundant requirement prior to recommending changes to requirements in other Reliability Standards.

#### Project Scope (Define the parameters of the proposed project):

The scope of the proposed project is to simplify the administrative burden with IRO-010-~~43~~, TOP-003-~~54~~ by developing risk-based compliance expectations and clarifying the four tasks identified in IRO-010-~~43~~ and TOP-003-~~45~~. The proposed project may require revisions to IRO-010-~~43~~, TOP-003-~~54~~ and associated definitions (especially Real-time monitoring and Balancing Authority analysis functions) as necessary to mitigate expectations of zero-defect compliance (e.g., setting thresholds to address telemetry availability), include provisions for dispute resolution, negotiating data exchanges where entities disagree on the necessity of data for reliability, and address confidentiality concerns. The proposed

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project will need to utilize any available industry resource necessary to maintain flexibility for various operational environments and technology (i.e., SCADA/ICCP, phone, instant messaging, internet-based systems, etc.). The project may also require development of Implementation Guidance or other ERO guidance to simplify the administrative burden.

The proposed project may also require revisions to other standards as necessary to remove redundant data specification obligations contained in other Reliability Standards that are associated with the four reliability tasks identified in the Detailed Description below. The scope of the project should also include coordination with existing projects that have operational data exchange within their scope.

If necessary, the proposed project may also require revisions to address data and information exchanges and obligations between provider and requester that are facilitated through a third-party intermediary.

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification<sup>1</sup> which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition).

The project may require revisions to IRO-010-~~43~~, TOP-003-~~54~~ and associated definitions in the NERC Glossary (especially Real-time monitoring and Balancing Authority analysis functions) to clarify expectations for the “data specification” and associated tasks identified in IRO-010-~~43~~ and TOP-003-~~54~~. The revisions should continue to allow each Registered Entity with operational responsibilities to perform the tasks identified in IRO-010-~~43~~ and TOP-003-~~54~~ the ability to request and receive the information it needs to perform those tasks, while protecting public disclosure of commercially sensitive information and providing a dispute resolution process for conflicts between entities related to necessary data exchanges. The four tasks identified in IRO-010-~~43~~ and TOP-003-~~54~~ and associated standards are listed below.

- Operational Planning Analysis (IRO-008-2 and TOP-002-4)
- Real-time Assessments (IRO-008-2 and TOP-001-4)
- Real-time monitoring (IRO-002-5 and TOP-001-4)
- Balancing Authority analysis functions (BAL-001-2, BAL-002-3, BAL-003-1.1 and BAL-005-1)

This may necessitate revisions to the standards included above and any other standard or definition identified by the drafting team during the project as necessary to achieve the purpose of this project.

<sup>1</sup> The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

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The drafting team should also develop Implementation Guidance and/or work with NERC staff to develop other ERO guidance to simplify the administrative burden as needed.

Once those activities are clarified, the drafting team should also evaluate and revise, if necessary, ~~remove~~ potentially redundant operational data exchange requirements dispersed in other standards including, but not limited to, the following:

- BAL-005-1 R2
- EOP-005-3 R13
- EOP-005-3 R14.2
- FAC-014-~~32~~ R5
- FAC-014-~~23~~ R6.1.
- IRO-008-~~32~~ R5
- IRO-008-~~23~~ R6
- IRO-017-1 R3
- TOP-001-~~56~~ R9
- TOP-001-~~65~~ R15
- VAR-002-4.1 R3
- VAR-002-4.1 R4

~~The project should also evaluate any other standard identified by the drafting team during the project as necessary to achieve the purpose of this project.~~ The Standard Drafting Team should seek to identify opportunities to evaluate and revise ~~remove~~ redundant requirements ~~and, if necessary, retire requirements that are not needed for reliability~~; however, the Standard Drafting Team should not ~~revisetire~~ requirements that are not directly related to the four reliability tasks identified above. The evaluation at a minimum should consider the following questions:

- Is the purpose of the activity currently within the scope of one or more of the tasks ~~and consequently identified in~~ IRO-010-~~43~~ and TOP-003-~~54~~? If so, then consider removing-revising due to redundancy.
- If minor modifications were made to IRO-010-~~43~~, TOP-003-~~45~~ and/or associated definitions (especially Real-time monitoring and Balancing Authority analysis functions), then would the activity be within the scope of those standards? If so, then ~~consider removing~~consider revising due to redundancy.

The drafting team should reference precedence from past projects to support this effort, including background materials developed during Project 2014-03 that describe the “data specification” concept including the petition to the FERC and the [Project 2014-03 Mapping Document](#).

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

unknown

<b>Requested information</b>	
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):	
N/A	
To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):	
All NERC Functional Entities are potentially impacted by the scope of this SAR. The recommendations are both technical and administrative in nature but meant to address inefficiencies within requirements for data collection. Therefore, the drafting team should consist of members who are familiar with both aspects.	
Do you know of any consensus building activities <sup>2</sup> in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.	
The SER Phase 2 team hosted an industry webinar on February 22, 2019 presenting six efficiency concepts, including consolidating and simplifying information and data requirements. The presentation was followed up by an industry survey to assess support for the concepts. This concept received the second highest support from industry. In addition, an informal survey was conducted on the content of this SAR to assess industry support. The feedback from industry and SER Phase 2 team responses are located on the <a href="#">Standards Efficiency Review page</a> .	
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?	
The Standard Drafting team should coordinate with existing projects that have operational data exchange within their scope.	
Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.	
Yes, Implementation Guidance and/or other ERO guidance could assist with simplifying the administrative burden for the interim period while this project is being administered.	

<b>Reliability Principles</b>	
Does this proposed standard development project support at least one of the following Reliability Principles ( <a href="#">Reliability Interface Principles</a> )? Please check all those that apply.	
<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.

<sup>2</sup> Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

<b>Reliability Principles</b>	
<input checked="" type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

<b>Market Interface Principles</b>	
Does the proposed standard development project comply with all of the following <a href="#">Market Interface Principles</a> ?	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

<b>Identified Existing or Potential Regional or Interconnection Variances</b>	
Region(s)/ Interconnection	Explanation
<i>e.g.</i> , NPCC	

## For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff	<input type="checkbox"/> Final SAR endorsed by the SC
<input type="checkbox"/> Draft SAR presented to SC for acceptance	<input type="checkbox"/> SAR assigned a Standards Project by NERC
<input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> SAR denied or proposed as Guidance document

## Version History

<b>Version</b>	<b>Date</b>	<b>Owner</b>	<b>Change Tracking</b>
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk