

## Meeting Notes

# Project 2021-06 Modifications to IRO-010 and TOP-003 | Drafting Team Conference Call

October 28, 2021 | 1:00 - 3:00 p.m. Eastern

### 1. Texas RE

#### a. Zero defect

- i. Improve upon the thresholds identified in the Texas RE and ERCOT comments and thinks they are too lenient and maybe include a tier system to help
- ii. It's apparent from comments to assume that there is no zero defect expectations in regions while others have it in regions, looks to revising the scope; tighten this up. Including this concept and look at regions to develop their own thresholds
- iii. Does not have causation, some entities have it embedded, standard doesn't have it in, the entity does have any expectation, the expectation is to have a zero defect, agreement, or consultation on data specifications. This shows the use and need of data, this is admin burden to defend from zero defect. Consolation is an approach.
- iv. Went through standards, a lot of words from industry, the language is open enough, Standard Authorization Request (SAR) has a good space for the entity to determine what it is. Get away from words, look at process, and look at the intent. Specific and general. Entities look at the intent and meaning but they need to answer to zero defect.
- v. Questions Texas RE's comment, not sure of the underlying point, the four reliability tasks, SAR need to assume that because that's how it exists already. Do we need to firm it up?
- vi. Mentions 2014 and 2015-09, FERC made comments about redundancy with 2021-06 standards, needs a specification requirement, since specific action, RTA is broad, needs to be more specific and communicated. Fear if this is eliminated under the balancing authority analysis then something with be dropped.
- vii. Texas RE's concern is, the information received used for other purpose?
- viii. Other purpose but not concern. More eop11 ex attachment SOL and OPA and RTA, 2014-03 need to communicate sol, communicate top-003 and iro-010 risk to do so is so high.
- ix. The fear is that specific requirements will removed under this project because the current practice is to get the data from a data request and we shouldn't do that where the standards are specific. Look at other standards, that's the concern, example: SOL and IROL requirements. RC may get this data from a data request under IRO but we shouldn't delete from other standards.
- x. Wording is broad enough, risk is great to not do so and need checks for the risk tolerance.

- xi. Would a clarifying sentence be in order?
  - xii. Mike opinion about objective of the SAR: a sentence in scope would elevate, says redundancy removed,
  - xiii. Condition, loss of specificity, can be altered but FERC supports specificity where needed.
  - xiv. Agrees, ds is not calling out data and says its high level on data
  - xv. Drafting team would go over this not extra, ds
  - xvi. Clarifications from Chat “  
Wording: The intent is not to do away with specific requirements in other standards under the assumption that the same data falls under the 4 reliability tasks contained in the IRO and TOP standard articulated in the SAR scope.  
The SDT should evaluate any potential reliability risk incurred by removing a perceived redundant requirement prior to recommending doing so.  
I prefer 2nd version.”  
The sentences do not conflict and are not mutually exclusive so both can be used.
- b. Risk based data specification
- i. “Texas RE believes that such approaches are best determined within the framework of the specific data specification itself rather than prescribed through the IRO-010 data specification standard itself.”
    - (1) Texas RE is saying is risk-based approach, waiting until an event to trigger performance doesn’t agree with the approach, this instance, good data and consistence is better approach.
  - ii. QUESTIONS
    - (1) Is the purpose of the activity currently within the scope of one or more of the tasks and consequently IRO-010-2 and TOP-003-3? If so, then remove as redundant.
    - (2) Modifications (especially Real-time monitoring and Balancing Authority analysis functions), then would the activity be within the scope of those standards? If so, then revise and remove as redundant.
    - (3) Does the receiving Registered Entity have an obligation to use the information? If so, then identify the existing requirement or create a new requirement for them to use it. If not, then retire outright as unnecessary for reliability of the BES.
    - (4) 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.

- iii. Define unnecessary admin burden.
  - (1) [https://www.nerc.com/pa/Stand/Project%20201302%20Paragraph%2081%20DL/P81\\_Phase\\_I\\_technical\\_white\\_paper\\_01-05-13\\_clean\\_final.pdf](https://www.nerc.com/pa/Stand/Project%20201302%20Paragraph%2081%20DL/P81_Phase_I_technical_white_paper_01-05-13_clean_final.pdf)
  - (2) Page 8 Criteria B B1. Administrative
- iv. Get away from zero defect is have a tolerance level. If everything is going ok but do not provide but you get a volition but no issues happened.
  - (1) Ex: auditors, because entity did not do, ex three part communication.
- v. Re-wording of SAR
  - (1) Suggested Texas re response: Thanks for pointing this out but this will be passed to SDT.
- vi. Talks about data quality, nothing today
- c. Reliability related tasks
  - i. Observed, Texas re-think, were only look at the 4 scopes for the standards, not sure what we can do. Texas re is looking at globally,
  - ii. Not taking the OPA RTA away, anything outside has room for an argument, entity may argue but RC top BA task needs it for. Entity provide it. Going beyond, but data is broad.
  - iii. Opposing opinions, none
  - iv. Per 5 for tasks
  - v. Brings up about the word tasks, instead of sub processes.
  - vi. brings up definitions of RTA ,
  - vii. Two terms are not defined- RT monitoring and BA analysis
  - viii. Philip Shafeei SEC: says software and contingency, the data is part as needed. What does statement say?
  - ix. Change SAR scope to be “may” rather than “will...require.”
  - x. Minimum will have revision in NERC Glossary, recommendation not sure if should keep book open, to required.
    - (1) UPDATE TOP-003 version and IROaked.
- d. Requirements proposed for possible retirement
  - i. Clarification address these concerns.