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

October 29, 2021 | 1:00 – 3:00 p.m. Eastern

Agenda Items

1. **Continuing Texas RE comment 1:**
   a. Requirements proposed for possible retirement:
      i. We will review any requirements before
      ii. Thank you for comments, and we do not delete language and redundancy
      iii. Do not do away with an specific requirements

2. **APS 1**
   a. Thank you for the comment and support.

3. **AEP 1**
   a. External entity is from RTO, TOP similar, they get it from other entities but not direct data links, probably from RTO
      i. The data request what the RTO already has, models from RTO, the data specifications is a burden since AEP has no direct links
      ii. Generators bought and sold, new data specification is new, AEP just gets it from RTO.
      iii. Burdensome to make all these links, a lot for a top, the link brings top 1 into play. R20 redundant data from control center, top gets from RTO so cost of infrastructure is not in play.
   b. Entities that required, local places, and an inner middle person that provides data to RTO. Qualified scheduling entity is inner middle man. SAR needs to clarify these circumstances.
   c. RTO has no functional entity, create a new function entity that's an RTO or recognize that some RC's are part of an RTO?
   d. Data originates with in one function entity, but traverses from other entities from not original entities, where do these mediaries play?
   e. Main point of contact for data specification?
   f. Communication infrastructure would be increased by a factor of 10 when expanding the communication middle man. Middle man is just taking call and passing it on, creates compliance issues, and logistical aspect.

    g. Future

        i. Adding language make sure it is in scope

        ii. Passing on to drafting team to address and discuss

    h. If in scope of SAR then not evident

        i. Discuss and possibly expand the quote

        (1) Reduce admin burden

    i. Top 1 r20 tie back, audits sending to 10 different entities, TOP 1 redundancies

4. **Southern Company 1:**

    a. What is new in this SAR, or any changes in SAR

        i. The changes will reduce administrative burden, not to change the ability to receive

        (1) Addressed

        ii. "Thank you for the comment and see revised SAR to see if it address this comment."

5. **CAL ISO 1:**

    a. The functional model is a historical model and not maintained

    b. NERC functional model Substance presidential power, direct power enforced in future standards.

        i. Thank you for the comment, the functional model has been retired. The functional model is no longer used.

    c. Similar to before, requesting entity, get the data goes through other entities. Not in architecture in the standard, person in between is a theme

        i. RC need information functional model doesn't create a frame work. Not an enforceable document.

    d. FERC from before about the functional model, reframe the cold weather.

    e. Recognize the concern raised by ERCOT in their comment before,

    f. Cip 12 ties to TOP 003 and IRO 010, relates to rating and data requests

        i. This may addresses by ERCOT and RE

        ii. Do remove redundant data request related standards

    g. SAR gives flexibility to evaluate this and <u>including but not limited to</u> this list, not an all-encompassing list. This is in the scope. Forward the standards to drafting team

    h. Information and data is the same, but they are not, information vs data, information is operation, data is bits and bytes to transfer information.

        i. Leave vague of all standards

      i.   Fac07 r8, this doesn't prevent IRO 010 from making the request. Are there not requirements in other standards?

         i.   Consider both bullets together.

6. **EVErgy, please see the response to EEI.**

7. **American Public Power Association**

    a.   Clarification for zero defect

      i.   Thank you for the comment and support, we will be addressing these in the next redline

    b.   1st para:

      i.   risk based assessment vs risk based standard

      ii.   Nothing to address

8. **EEI**

    a.   Thank you for the support, the SAR has been reflected to show the most recent version of iro-010 and top-003.

9. **Southwest PP**

    a.   Support nsrf

      i.   Confidential concerns

      ii.   Methodology how to

         (1) Dispute resolution

      iii.   Mutual agreeable timing requirement

      iv.   Bullet 4 cannot tackle.

    b.   Thank you for your comment, please see the revised sar.

      i.   010.3

         (1) Periodicity

            (a) Current language is good or dictate when they want to respond.

            (b) Is this broad enough to respond

         (2) Not the best, in the west, requester specifies the time period receive it, alternative can be requested. Mutually agreeable is not required but best utility practice.

      ii.   Do not add to scope, but could be passed on the SDT

10. **Alameda Municipal Power**

    a.   Related to CAL ISO functional model and same underlying issue as CAL ISO

    b.   How to provide data specification without providing it back.

       i. Ex, inner connection with generator brought into top then gives it RC but third party is getting data. It is awkward to auditors and compliance. No mapping.

   c. Who responsible for the data provision?

   d. This adds to the burdens, data requests adds burdens,

   e. This is trying to expand the scope

   f. Look at implementation guidance, the standards drafting team, look at approved organization though.

       i. Thank you for the comments, the SAR drafting team decided to not expand the scope but will forward your comment to the standards drafting team for review.

11. Mid content ISO

   a. Similar themes to before

       i. Zero defect

   b. Make sure revisions limit data exchange to SCADA only, not outage data

       i. Unattended consequences.

   c. The scope is specified to specific standards such as CAL ISO, but miso would allow a full RE write but we have so much support

       i. The SAR drafting team is inclined to leave the SAR as is with the support shown by industry

   d. Do not need to constrict the standard for only reliability needs.

   e. Refer to documents, data to consider in a data request.
https://www.nerc.com/files/TOP-005-2.pdf
It's Attachment 1-TOP-005