

Meeting Notes

Project 2021-06 Modifications to IRO-010 and TOP-003 Drafting Team

February 6, 2023

Review NERC Antitrust Compliance Guidelines and Public Announcement

Josh Blume reviewed the NERC Antitrust Compliance Guidelines and noted that the meeting was public.

Roll Call

J. Blume called roll. See page five for attendance.

Chair's Remarks

J. Blume thanked everyone for joining the call. Dennis Sauriol advised the group that they would be reviewing comments received and redlining standard authorization request. He reminded observers their input is important and asked them to provide comments or ask questions as desired. J. Blume took secondary notes for the day.

Review/Discuss Redline Standards TOP-003 R1

The team continued reviewing the comments received and started redlining the TOP-003 Standard. High level themes/notes are provided below.

Review of responses:

- The intent was to try and bridge gap between an entity you are requesting data from you should have redundant communications setup. This was an attempt to circumvent by taking advantage of an intermediary where redundant communications are already setup. The team agrees this does not add to reliability but that was not the point.
 - ERCOT has run into this situation before and they are ok without this language because they have other protocols that would deal with this.
 - Review of most comments indicate that this language is not needed or desired.
 - It was discussed that if we remove this language from the proposed re-write then we mention it is because of the comments received and the fact that this issue can be addressed by other means.
 - Josh to send this topic to entire team and we do a group vote.
 - Revised 1.4 to the following, removing "intermediary" language

- Started 1.4 with this:

1.4. The deadline by which the respondent is to provide the indicated data and information that includes, but is not limited to:-
1.4.1. Specific deadlines or periodicity in which data and information is to be provided;
1.4.2. Performance criteria for the availability and accuracy of data and information, as applicable;
1.4.3. Provisions to update or correct data and information, as applicable or necessary.
1.5. Identification of the mutually agreed upon format.
1.6. Identification of the mutually agreed upon process for resolving conflicts between the Transmission Operator, the responsible respondent identified in Part 1.1 that has the required data and information.
1.4. Identification of the mutually agreed upon security protocol or method for securely transferring data and information.
1.7.

- Changed Protocols to Methods and changed 1.6 to the following:

1.4. The deadline by which the respondent is to provide the indicated data and information that includes, but is not limited to:-
1.4.1. Specific deadlines or periodicity in which data and information is to be provided;
1.4.2. Performance criteria for the availability and accuracy of data and information, as applicable;
1.4.3. Provisions to update or correct data and information, as applicable or necessary.
1.5. Identification of a mutually agreeable format.
1.6. Identification of the mutually agreed upon process for resolving conflicts.
1.4. Identification of the mutually agreed upon methods for securely transferring data and information.
1.7.

- R5 was changed to the following:

R5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall satisfy the obligations of the documented specifications. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*

- Comments below

Name	Company	Answer(yes,no)	Comment	Document
Mark Gray	Edison Electric Institute	No	While EEI would not be opposed to adding language in IRO-010-5 and TOP-003-6 to specifically address the use of third-party intermediaries, however, this issue is not a reliability gap and is not a sufficient reason to open these two Reliability Standards. The primary purpose of this project was to address issues identified under the SER Phase 2 project which identified evidence and data retention as the number one concern identified by entities that needed to be addressed. Our review of the changes indicates this was not addressed and there is insufficient reason to open these two standards and make the modifications proposed.	

Chris Wagner	Santee Cooper	No	Santee Cooper believes that this will create additional administrative burdens and that it does not increase reliability. We also believe that 'identification of intermediaries' is NOT within the scope of the SAR and the current language appears to place the burden on the intermediary if the end-user specifies so in their protocol. Any protocols regarding accuracy and data correction should not place any responsibility on the intermediary who is only an information conduit.
James Baldwin	Lower Colorado River Authority	No	
Kathleen Goodman	ISO New England, Inc.	No	The ISO/RTO Council Standards Review Committee (SRC) does not see a reliability need to have this provision (IRO-010, Part 1.4 and TOP-003, R1.4) in the standard. As entities are successfully able to utilize an intermediary today, we do not see the value in adding this commercial (contractual) provision to a mandatory reliability standard. Further, as this project was initiated pursuant to the Standards Efficiency Review (SER), the

Kendra Buesgens	MRO	No	<p>The MRO NSRF does not believe the additional language of "identification of an intermediary to pass through data and information unaltered from the entities" is needed to achieve the underlying purposes of the SAR: to mitigate zero defect expectations or reduce administrative burdens.</p> <p>The MRO NSRF does not see the value of the language:</p> <ul style="list-style-type: none"> • Intermediary may not be a NERC Registered Entity, there is no reliability value in identifying whom this intermediary is from an administrative standpoint. • Further, the intermediary would already be known to the RCs, TOPs & BAs, as the data received would be coming from this intermediary. • The data should always remain 'unaltered' if a responsible entity, whether NERC Registered Entity, is to meet compliance with the IRO-010-5 & TOP-003-6 data specification. • If an Intermediary is to be used, the contractual terms & conditions with the NERC Registered Entity, would ultimately specify who, what, where, when & how. • Identifying the intermediary could lead to miscommunications and reliability gaps if there ever was a problem with the data. The RCs, TOPs & BAs could contact the intermediary rather than the responsible entity to resolve/question data integrity issues.
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- Discussed the following comment to point to R1 instead of sub requirements

• We consider the use of the word "criteria" in R3 "receiving a specification in Requirement R2 shall satisfy the documented specifications using the criteria established in Requirement Parts 1.5 through 1.8" to be misleading, since only 1.5.2 identifies criteria. Furthermore, 1.4 is more in line with 1.5 through 1.8 than with 1.1 through 1.3. So the text should refer to "1.4 through 1.8". That said, since all these elements (1.1 through 1.8) are all required in the specification, it seems to us simpler and sufficient to write "Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a specification in Requirement R2 shall satisfy its requirements established per R1."

• Title in header of document needs to be modified to reflect changes to the title in Section 1.

Future Meeting

February 15, 2023

The meeting adjourned at 4:00 p.m. Eastern.

Attendance for February 6, 2023

Name	Company	Member/ Observer	Questions assignment	Conference Call/Web (Y/N)
Matthew Harward	Southwest Power Pool, Inc.	Member	3 2	Y
Dennis Sauriol	American Electric Power	Member	4 9 10	Y
Jennifer Richards	SCPSA (Santee Cooper)	Member	5 3 6	Y
Barry Jones	Western Area Power Administration (WAPA)	Member	2 5	N
Bob Cielen	BC Hydro	Member	6 1	N
Stephen Solis	Electric Reliability Council of Texas, Inc.	Member	1, 10 8	Y
Nick Messner	California ISO	Member		Y
Rachel Melton	California ISO	Observer	8,9 4	Y
Lauren Perotti	NERC	Observer		N
Jordan Mallory	NERC	Observer		Y
Michael Gandolfo	FERC	Observer		N
Michael Brytowski	PMOS	Observer		Y
Phillip Shafeei	Seminole Electric	Observer		Y