

Technical Rationale for Reliability Standard

TOP-003-6

October 2022

TOP-003-6 – Transmission Operator and Balancing Authority Data and Information Specification and Collection

Rationale:

The primary purpose of this project is to reduce unnecessary administrative overhead and reduce potential zero defects expectations associated with the current IRO-010-4 and TOP-003-5 standards, while ensuring that Registered Entities request and receive the data and information necessary to support the four reliability tasks required to perform Operational Planning Analysis, Real-time Assessments, Real-time monitoring, and Balancing Authority analysis functions.

The SDT reviewed standards listed in the SAR's Detailed Description to determine whether additional changes could be proposed to the standards to address potential redundancy of requirements related to the four reliability tasks identified in IRO-010-5 and TOP-003-6. The SDT also reviewed the results of the Standards Efficiency Review initiative. Due to the criticality of the tasks and functions identified in (standards listed in the SAR's Detailed Description), the SDT determined there is insufficient justification(s) for the retirement of these requirements and are not proposing changes to the reviewed standards.

The data specification requirements in IRO-010-5 and TOP-003-6 are substantively similar, if not functionally identical therefore the SDT has revised both standards so that the language is parallel in form and function and uses similar vernacular in describing the underlying requirements.

The SDT has drafted revisions in a manner that retains flexibility for applicable entities to utilize available technologies, integrate new technologies, and to define expectations for data and information exchange. This allows entities to continue to receive the data and information they believe is necessary to perform its functions and promote reliability.

Proposed revisions include Title, Purpose, and Requirements sections.

Rationale for Title

The proposed Title change from "Operational Reliability Data" to "Transmission Operator and Balancing Authority Data and Information Specification and Collection" aligns with the Title section of IRO-010-5. This revision refers to the function of the standard whereas the previous title suggests a broader purpose than the four identified core reliability tasks.

Rationale for Purpose

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The proposed changes to Purpose in TOP-003 align with the purpose of IRO-010-5. The two standards are companions, whereas the former applies to RC data specifications, this standard applies to TOP and BA specifications. Throughout the standard, the SDT used the terms “data” and “information” to clarify that specifications include both “data and information.” The intent is to include data and information necessary for Transmission Operators and Balancing Authorities to perform their core reliability tasks. The revision clarifies that specifications can contain other data/information in addition to data typically provided systematically from field devices via SCADA/ICCP.

In addition to operational planning stated in the previous version of the standard, both data and information are necessary for satisfying the four identified core reliability tasks. The four tasks include monitoring and assessing activities, therefore the purpose has been clarified by including planning, monitoring, and assessing operations.

Rationale for Requirement R1

R1 is revised to clarify that specifications include both data and information that a Transmission Operator requires. This also aligns with the Purpose of the Standard.

Rationale for Subpart R1.1

R1 is revised to include not only the list of data and information that the requestor needs for the four core reliability tasks, but also to identify the applicable entity that is required to respond to the request for the specification. The purpose is to ensure that data and information specifications clearly identify the responsible parties that need to comply with the request.

Rationale for Subpart R1.4

R1.4 is revised to address the use of intermediaries in the data provision processes. The previous content referring to periodicity is addressed in a revised R1.5

R1.4 addresses the use of an intermediary to forward data and information to the requestor from the applicable entity. An entity that is required to respond to the data and information request in R2.1 can use an intermediary to pass through the data and information unaltered from the entities that originated the data and information.

Using an applicable entity as an intermediary reduces the burden to maintain data and information exchanges with multiple entities, however an intermediary is not responsible to ensure the specification integrity or availability of such data or information. The intermediary party does not assume compliance risk for its participation in passing the data and information. The use of an intermediary does not remove the responsibility of the respondent (identified in R1.1) to provide the data and information, and the identified respondent remains ultimately responsible to fulfill the provision of data and information.

Rationale for Subpart R1.5

R1.5 identifies that Specifications should include protocols to address periodicity, to address, performance criterion, to provide update and correction mechanisms.

- R1.5.1 is revised to include Deadlines and Periodicity (as previously included in R1.4) for data and information to address data that is expected to be updated on different time frames; The inclusion of deadlines addresses data provisions that may be immediate, one-time, or that do not have recurring periods.
- R1.5.2 is revised to address Performance criterion for the availability and accuracy of data and information necessary to mitigate expectations of zero-defect compliance. Such expectations may or may not be reasonable, and this language permits requestors to specify where an expectation of zero-defect compliance is necessary.
- R1.5.3 is revised to address Provisions to update or correct responsible respondent data and information. This requirement allows for inclusion of protocols to aid in rectifying data and information errors that requestors need to mitigate zero defect compliance.

R1.5 recognizes that the protocols are not limited to these identified requirements; allowing entities the flexibility to include protocols to address differences in organizations, operational environments, processes and technologies provide flexibility to define specifications which reduce administrative overhead and potential zero-defect approaches.

Rationale for Subpart R1.6, R1.7, R1.8

Identification of the mutually agreed upon format is removed from R5.1 and placed in R1.6. Similarly, processes for resolving conflicts, and the identification of security protocols have been removed from R5.2 and 5.3 and included in the specification in R1.7 and R1.8.

R1.6 moves part R5.1 into the Transmission Operator data specification, as a requirement of the specification itself.

R1.7 identifies a requirement for a mutually agreed upon process for resolving conflicts between the Transmission Operator and the respondent, and if necessary, the intermediary. Placement of this sub part under R1, establishes the inclusion of this process in the data specification itself. By establishing conflict resolution as sub part of the requirement, Requestors would be expected to establish processes directly with the responding parties, to improve upon requests and responses, and performance expectations. The provision will establish the process for resolving disagreements, while retaining the requestor's authority to request data it needs. Respondents would be expected to engage the requestor about the respondent's concerns using the established process contained in the data request. These concerns could include, for example, concerns for managing risks for public disclosure of commercially sensitive information, or for establishing a dispute resolution process for conflicts between entities related to necessary data exchanges, or for the establishment of data correction protocols.

R1.8 has included both security protocol and method for securely transferring data and information. The requirement acknowledges that data and information may not require a protocol but may require an agreed upon method for secure transfer, or both.

Rationale for Requirement R2

R2 is revised to clarify that specifications include both data and information that a Balancing Authority requires. This also aligns with the Purpose of the Standard.

Rationale for Subpart R2.1

R2 is revised to include not only the list of data and information that the requestor needs for the core reliability tasks, but also to identify the applicable entity that is required to respond to the request for the specification. The purpose is to ensure that data and information specifications clearly identify the responsible parties that need to comply with the request.

Rationale for Subpart R2.4

R2.4 is revised to address the use of intermediaries in the data provision processes. The previous content referring to periodicity is addressed in a revised R2.5.

R2.4 addresses the use of an intermediary to forward data and information to the requestor from the applicable entity. An entity that is required to respond to the data and information request in R2.1 can use an intermediary to pass through the data and information unaltered from the entities that originated the data and information.

Using an applicable entity as an intermediary reduces the burden to maintain data and information exchanges with multiple entities, however an intermediary is not responsible to ensure the specification integrity or availability of such data or information. The intermediary party does not assume compliance risk for its participation in passing the data and information. The use of an intermediary does not remove the responsibility of the respondent (identified in R2.1) to provide the data and information, and the identified respondent remains ultimately responsible to fulfill the provision of data and information.

Rationale for Subpart R2.5

R2.5 identifies that Specifications should include protocols to address periodicity, to address performance criterion, to provide update and correction mechanisms.

- R2.5.1 is revised to include Deadlines and Periodicity (as previously included in R2.4) for data and information to address data that is expected to be updated on different time frames; The inclusion of deadlines addresses data provisions that may be immediate, one-time, or that do not have recurring periods.
- R2.5.2 is revised to address Performance criterion for the availability and accuracy of data and information necessary to mitigate expectations of zero-defect compliance. Such expectations may or may not be reasonable, and this language permits requestors to specify where an expectation of zero-defect compliance is necessary.
- R2.5.3 is revised to address Provisions to update or correct responsible respondent data and information. This requirement allows for inclusion of protocols to aid in rectifying data and information errors that requestors need to mitigate zero defect compliance.

R2.5 recognizes that the protocols are not limited to these identified requirements; allowing entities the flexibility to include protocols to address differences in organizations, operational environments,

processes and technologies provide flexibility to define specifications which reduce administrative overhead and potential zero-defect approaches.

Rationale for Subpart R2.6, R2.7, R2.8

Identification of the mutually agreed upon format is removed from R5.1 and placed in R1.6. Similarly, processes for resolving Conflicts, and the identification of security protocols have been removed from R5.2 and R5.3 and included in the specification in R2.7 and R2.8

R2.6 moves part R5.1 into the data specification for Balancing Authority data specifications, as a requirement of the specification itself.

R2.7 identifies a requirement for a mutually agreed upon process for resolving conflicts between the Balancing Authority and the respondent, and if necessary, the intermediary. Placement of this sub part under R2, establishes the inclusion of this process in the data specification itself. By establishing conflict resolution as sub part of the requirement, Requestors would be expected to establish processes directly with the responding parties, to improve upon requests and responses, and performance expectations. The provision will establish the process for resolving disagreements, while retaining the requestor's authority to request data it needs. Respondents would be expected to engage the requestor about the respondent's concerns using the established process contained in the data request. These concerns could include, for example, concerns for managing risks for public disclosure of commercially sensitive information, or for establishing a dispute resolution process for conflicts between entities related to necessary data exchanges, or for the establishment of data correction protocols.

R2.8 has included both security protocol and method for securely transferring data and information. The requirement acknowledges that data and information may not require a protocol but may require an agreed upon method for secure transfer, or both.

Rationale for Requirement R3

R3 is revised to add the term "and Information" for consistency.

Rationale for Requirement R4

R4 is revised to add the term "and Information" for consistency.

Rationale for Requirement R5

R5 is revised to require the Respondents to satisfy the documented specification based on the criterion established in R1.5-1.8 for requests originating from Transmission Operator specifications.

R5 is revised to require the Respondents to satisfy the documented specification based on criterion established in R2.5-2.8 for requests originating from Balancing Authority specifications.