

Meeting Notes

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

January 30, 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 two for attendance.

Chair's Remarks

Matt Harward 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. Bob Cielen took secondary notes for the day.

Review/Discuss Q1-Q4 Comments Received

The team continued to review the comments received. Due to the number of responses, more than one meeting will be needed to complete a review. High level themes/notes are provided below.

Notes: J. Richards will be on medical leave through February and part of March, 2023.

Barry Jones generated some discussion on how to summarize and identify the concerns raised in the responses.

Review of responses:

- Question 1
 - B. Jones organized the information in the summary in the order of the number of repeated comments/themes.
 - Suggestion made to include the question at the top of the summary templates.
 - General comments from the summary were reviewed.
 - A discussion ensued on whether there was confusion in the understanding of what a third party or intermediary is, and the obligations of the party.
 - There is a perspective in the comments that other requirements were not removed elsewhere, so the standard drafting team did not do its job; that the primary purpose of the standard authorization request was not met. There is a perspective that we are adding to the Standards rather than removing requirements.
 - The SDT agreed to circle back to review this question.

- Question 2
 - B. Jones discussed the issue of identifying the requirement for comments over the more general questions we asked. The assessment (summary) attempted to pull out or identify the requirements and themes of the responses (what is the issue and what requirement is it pinned to).
 - Two major themes were found in the responses: double jeopardy with CIP012 exists and added administrative burden. The request is to remove that double jeopardy.
 - The criticisms may be more than what the SDT proposed, and point to the legacy language in the standard.
 - The team discussed the possible actions to address the double jeopardy, such as language that focuses on information security while relieving the requirement on the data, and to identify the requirement includes non-CIP data/information.
- Question 3
 - The general comments were reviewed.
 - There appears to be camps that are not in favor, perceiving that the administrative burden increases and a camp supporting as zero defect is addressed. The challenge may be in finding a way to address both camps sufficiently.
 - There was a discussion about what data may be CIP and non-CIP.
- Question 4
 - The general comments were reviewed.
 - The word “or” in the question created some confusion, as the yes/no responses included comments that were similar: more prescriptive is not needed, more flexibility is desired.
 - The consensus is that the changes were intended to support more flexible and less prescriptive. The comments suggest that the wording is adequate and no clarification is needed. However, D. Sauriol will circle back to review the data and quantify responses.
- Planning for in-person team meeting tentatively scheduled for February 28 to March 2, 2023.

Future Meeting

February 1, 2023

The meeting adjourned at 2:00 p.m. Eastern.

Attendance for January 30, 2023

Name	Company	Member/ Observer	Question Assignments	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	Y
Bob Cielen	BC Hydro	Member	6 1	Y
Stephen Solis	Electric Reliability Council of Texas, Inc.	Member	1, 10 8	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
Eugene Blick	FERC	Observer		Y
Michael Brytowski	PMOS	Observer		Y
Phillip Shafeei	Seminole Electric	Observer		Y