

Notes

Real-Time Operations SDT — Project 2007-03

December 15, 2009 | 8:00 a.m

1. Administrative Items

a. Introductions

The call was brought to order at 0800 EST on Tuesday, December 15, 2009. Call participants were:

SDT: Paul Bleuss (CMRC), Jim Case — Chair (Entergy), Al DiCaprio (PJM)

FERC staff: Eugene Blick, Ted Franks, Ibrahim Oweis

NERC: Ed Dobrowolski – Coordinator, Laurel Heacock

b. NERC Antitrust Compliance Guidelines — Ed Dobrowolski

There were no questions raised on the NERC Antitrust Compliance Guidelines.

c. Conference Call Agenda and Objectives — Jim Case & Eugene Blick

The SDT believes that they are close to being finished with their work and is looking for clarity on FERC staff's position on the project.

It was noted that FERC staff does not speak for the Commission.

2. Discuss Commission Approved TOP Reliability Standards: TOP-002 through TOP-008

a. Continue discussion on requirements proposed for removal or deletion by the SDT

This discussion started where the meeting on December 10, 2009 ended using the proposed mapping table as the basis for discussion. As per the agreement reached at that meeting, if an issue has already been discussed as part of another item or requirement, e.g., data specification, it will not be re-discussed during this call.

TOP-002-2

Requirement R4: IRO-010-1 should be marked as proposed. In general, any requirement cited from Project 2007-03 should also be marked as proposed.

AI – The SDT should mark the resolution of TOP-002-2, Requirement R4 as based on the ‘proposed’ IRO-010-1.

AI – The SDT should mark any mapping table resolutions that cite requirements in this project as ‘proposed’.

Requirements R5 & R6: The SDT explained that the Functional Model requires a Balancing Authority to operate under the direction of the Transmission Operator for such matters. It is also a basic tenet of operations and good standards that only one entity should be ‘in charge’. The Balancing Authority can only work within the constraints handed down by the Transmission Operator. Any needed coordination issues are built in to the Functional Model. Therefore, the Transmission Operator should be doing the plan and passing it down to the Balancing Authority.

The Balancing Authority gets any needed data to the Transmission Operator through the data specification requirements so TOP-003-2 should be added to the resolution.

AI – The SDT should add TOP-003-2 to the mapping table resolution for TOP-002-2, Requirements R5 & R6.

FERC staff asked if the BAL-002 reference is pertinent to this resolution.

AI – The SDT should review the pertinence of BAL-002 as a reference to the resolution of TOP-002-2, Requirements R5 & R6.

Requirements R7 & R8: No further questions at this time.

Requirement R9: FERC staff had no comments on this item.

Requirement R10: The SDT position is that SOLs and IROLs are transmission items for which the Balancing Authority has no information or control. The Transmission Operator instructs the Balancing Authority as to what to do in these situations.

Requirement R11: FERC staff re-emphasized that this requirement is broader than the next-day assessment proposed. Other issues were discussed previously.

Requirement R12: The SDT should add ‘proposed’ to the resolution.

AI – The SDT should add the word ‘proposed’ to the cited reference for TOP-002-2, Requirement R12 resolution.

Requirement R13: The comment on Project 2007-09 should be deleted as it is superfluous to this discussion. MOD-024 & MOD-025 are not approved as yet as they are fill-in-the-blank standards and should be listed as same in the table.

AI – The SDT should delete the reference to Project 2007-09 from the resolution suggested for TOP-002-2, Requirement R13.

AI – The SDT should note that MOD-024 & MOD-025 are not approved standards in the resolution for TOP-002-2, Requirement R13.

Requirements R14, R15, & R16: No further questions at this time.

Requirement R17: The SDT should add ‘proposed’ to the resolution.

AI - The SDT should add the word ‘proposed’ to the cited reference for TOP-002-2, Requirement R17 resolution.

Requirement R18: FERC staff re-iterated its position with regard to Order 672 on this item. It also expressed concern on the perceived restrictions in the proposed definition of Reliability Directive which is only for Emergencies.

The SDT feels that the true reliability issue is not the name of a line but what is happening to it. The SDT feels that the proposed definition of Reliability Directive will clear up any confusion. It also pointed out the difficulty in assigning compliance responsibility for such a requirement as well as the near impossibility of coming up with truly unique identifiers on a nation-wide basis. The bottom line is that this situation is handled by the operators as part of their normal responsibilities and no one is aware of a switching error caused by confusion over line identifiers.

It was pointed out that the definition of Reliability Directive hasn’t been vetted by industry as yet and is therefore subject to change.

Requirement R19: The word ‘accurate’ for a nation-wide standard is the main concern of the SDT. A similar response has been provided for Project 2006-02.

TOP-003-1

Requirement R1: No further questions at this time.

Requirement R2: FERC staff re-iterated their concerns about TOP-001-2, Requirement R4 as previously discussed. The SDT should change any references to ‘Directive’ to ‘Reliability Directive’ throughout the mapping table.

AI – The SDT should change any references to ‘Directive’ in the mapping table to ‘Reliability Directive’.

Requirement R3: FERC staff had no comments on this item.

Requirement R4: No further questions at this time.

TOP-004-1

Requirements R1 & R2: No further questions at this time.

Requirement R3: The FAC-011 & FAC-014 references previously discussed should be added to this resolution.

AI – The SDT should add FAC-011 & FAC-014 references to the resolution for TOP-004-1, Requirement R3.

Requirements R4 & R5: No further questions at this time.

Requirement R6: The SDT pointed out that a transmission operator must have a documented Operating procedure covering every applicable standard requirement in order to pass an audit. FERC staff asked the SDT to check the references supplied for parts 6.2 & 6.3.

AI – The SDT should check the references supplied for the resolution to TOP-004-1, Requirement R6, parts 6.2 & 6.3.

TOP-005-2

Requirements R1, R2, & R3: No further questions at this time.

Requirement R4: The PSE is covered under the INT standards.

AI – The SDT should add that the PSE is covered in the INT standards in the resolution for TOP-005-2, Requirement R4.

TOP-006-2

Requirements R1 through R7: No further questions at this time.

TOP-007-0

Requirements R1 & R2: No further questions at this time.

Requirement R3: The SDT needs to cite the proposed TOP-001-2, Requirement R9 in its resolution.

AI - The SDT needs to cite the proposed TOP-001-2, Requirement R9 in its resolution for TOP-007-0, Requirement R3.

Requirement R4: No further questions at this time.

TOP-008-1

Requirement R1: The SDT needs to cite the proposed TOP-001-2, Requirement R9 in its resolution. Otherwise, no further questions at this time.

AI - The SDT needs to cite the proposed TOP-001-2, Requirement R9 in its resolution for TOP-008-1, Requirement R1.

Requirement R2: No further questions at this time.

Requirement R3: The SDT feels that a standard should not be mandating disconnection. This is in conflict with other standards where disconnection is dependent on System conditions and coordination with other functional entities. Such actions, taken unilaterally, could make conditions worse.

Requirement R4: No further questions at this time.

PER-001-0

Requirement R1: FERC staff re-iterated their concern about the apparent loss of the 'responsibility' term.

- b. Continue discussion on deletion of applicable entities by the SDT

All of these concerns were addressed in the discussions for item #2a.

3. Discuss SDT Proposed Reliability Standards: TOP-001 through TOP-003

FERC staff feels that the proposed definition of Reliability Directive is too restrictive as previously discussed.

The SDT should explore the need for a new requirement, patterned after the requirement proposed for the Reliability Coordinator in Project 2006-06, on stating that a communication is a Reliability Directive. However, this needs to wait until the definition of Reliability Directive is finalized.

All other issues were covered in item #2.

4. **Miscellaneous**

No other issues were identified for discussion at this time.

5. **Next Steps**

The SDT has a conference call scheduled for Thursday, December 17, 2009 at 1630 EST to discuss the meetings with FERC staff and to devise a plan for addressing any needed actions.

FERC staff will review their comments based on the SDT's explanations of their intent and philosophy.

6. **Action Items — Ed Dobrowolski**

The following action items were developed during this call:

- The SDT should mark the resolution of TOP-002-2, Requirement R4 as based on the 'proposed' IRO-010-1.
- The SDT should mark any mapping table resolutions that cite requirements in this project as 'proposed'.
- The SDT should add TOP-003-2 to the mapping table resolution for TOP-002-2, Requirements R5 & R6.
- The SDT should review the pertinence of BAL-002 as a reference to the resolution of TOP-002-2, Requirements R5 & R6.
- The SDT should add the word 'proposed' to the cited reference for TOP-002-2, Requirement R12 resolution.
- The SDT should delete the reference to Project 2007-09 from the resolution suggested for TOP-002-2, Requirement R13.
- The SDT should note that MOD-024 & MOD-025 are not approved standards in the resolution for TOP-002-2, Requirement R13.
- The SDT should add the word 'proposed' to the cited reference for TOP-002-2, Requirement R17 resolution.
- The SDT should change any references to 'Directive' in the mapping table to 'Reliability Directive'.
- The SDT should add FAC-011 & FAC-014 references to the resolution for TOP-004-1, Requirement R3.

- The SDT should check the references supplied for the resolution to TOP-004-1, Requirement R6, parts 6.2 & 6.3.
- The SDT should add that the PSE is covered in the INT standards in the resolution for TOP-005-2, Requirement R4.
- The SDT needs to cite the proposed TOP-001-2, Requirement R9 in its resolution for TOP-007-0, Requirement R3.
- The SDT needs to cite the proposed TOP-001-2, Requirement R9 in its resolution for TOP-008-1, Requirement R1.

7. **Adjourn**

The call was adjourned at 1030 EST.