Unofficial Comment Form

Project 2016-01 Modifications to TOP and IRO Standards

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on

**IRO-002-5 − Reliability Coordination - Monitoring and Analysis** and **TOP-001-4 − Transmission Operations**. The electronic form must be submitted by **8 p.m. Eastern, October 14, 2016.  
m. Eastern, Thursday, August 20, 2015**

Additional information about this project is available on the Project 2016-01 Modifications to TOP and IRO Standards [project page](http://www.nerc.com/pa/Stand/Pages/Project-2016-01-Modifications-to-TOP-and-IRO-Standards.aspx). If you have questions, contact Standards Developer, [Mark Olson](mailto:mark.olson@nerc.net?subject=Project%202016-01) (via email), or at (404) 446-9760.

## Background Information

On November 19, 2015, the Federal Energy Regulatory Commission (FERC) issued [Order No. 817](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20No.%20817%20Approving%20TOP%20IRO%20Reliability%20Standards.pdf) approving revised TOP and IRO standards and directing modifications to address the following reliability concerns:

* Transmission Operator (TOP) monitoring of non-Bulk Electric System (BES) facilities as necessary for reliability (P. 35);
* Redundancy and diverse routing of data exchange capabilities used by Reliability Coordinators (RC), Balancing Authorities (BA), and TOPs (P. 47); and
* Testing of alternate data exchange capabilities used in RC, TOP, and BA control centers (P. 51).

FERC established a deadline of July 2017 for NERC to file modifications to standards addressing the above directives.

Proposed IRO-002-5 and TOP-001-4 contain revised and new requirements addressing the Order No. 817 directives. Proposed IRO-002-5 received sufficient stakeholder support in the initial posting to proceed to final ballot, however the Standard Drafting Team (SDT) has incorporated revisions suggested by industry. Proposed TOP-001-4 did not receive sufficient stakeholder support and has also been revised. The SDT’s considerations of the responses received from the last comment period are reflected in these drafts of the standards.

## Questions

1. Do you agree with the changes made by the SDT to draft standard IRO-002-5? If you do not agree, or if you agree but have comments or suggestions for the proposed standard provide your recommendation and explanation.

Yes

No

Comments:

1. Do you agree with the changes made by the SDT to draft standard TOP-001-4? If you do not agree, or if you agree but have comments or suggestions for the proposed standard provide your recommendation and explanation.

Yes

No

Comments:

1. Do you agree with the Implementation Plan for the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the Implementation Plan provide your recommendation and explanation.

Yes

No

Comments:

1. Do you agree with the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for the requirements in the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the VRFs and VSLs provide your recommendation and explanation.

Yes

No

Comments:

1. Provide any additional comments for the SDT to consider, if desired.

Comments: