

Meeting Notes

Project 2015-04 - Alignment of Terms

Drafting Team Meeting

Monday, April 20, 2015 | 8:00 AM – 5:00 PM, MST
 Tuesday, April 21, 2015 | 8:00 AM – 5:00 PM, MST
 Wednesday, April 22, 2015 | 8:00 AM – 12:00 PM, MST

Salt River Project
 1 E. Continental Drive
 Tempe, AZ 85281

Dial In: 1-866-740-1260 | Access Code: 5216143 | Security Code: 042015
 WebEx: www.readytalk.com | Access Code 5216143

Meeting Attendees:

Name	Company	Member/ Observer	In-person (IP) Web (W)		
			4/20	4/21	4/22
Jerry Rust	Northwest Power Pool	Chair	IP	IP	IP
Chris Scanlon	Exelon	Vice-chair	IP	IP	IP
Mark Cole	Georgia System Operation Corporation	Member	IP	IP	IP
Jill Loewer	Utility Services, Inc.	Member	IP	IP	IP
Diana McMahon	Salt River Project	Member	IP	IP	N/A
Shannon Mickens	Southwest Power Pool, Inc.	Member	IP	IP	IP
Heather Moreno	Luminant Energy	Member	IP	IP	IP
Patrick O'Connor	ReliabilityFirst	Member	IP	IP	IP
Wayne Van Liere	LG&E and KU	Member	IP	IP	IP
Shane Crowe	Entergy	Member	IP	IP	IP
Andrew Pusztai	American Transmission Company	Observer	IP	IP	IP
Suzanne McBride	Federal Energy Regulatory Commission	FERC staff	IP	IP	IP
Kenneth Hubona	Federal Energy Regulatory Commission	FERC staff	W	W	W
Lacey Ourso	NERC – Standards	NERC	IP	IP	IP
Laura Anderson	NERC – Standards	NERC	N/A	N/A	IP

Agenda Items:**Agenda Item 1 - NERC Antitrust Guidelines and Public Meeting Announcement**

At the start of the meeting on all days, the NERC Antitrust Compliance Guidelines were presented to the team.

Agenda Item 2- Discussion of Meeting Objectives

The objectives for the meeting were outlined as follows:

1. Review the Standards Authorization Request (SAR) comments received and draft responses to comments. To the extent necessary, revise the SAR language based upon comments received.
2. Given the project scope outlined in the SAR, develop the project work plan and schedule.

Agenda Item 3- Review and respond to SAR comments received and, if necessary, revise SAR

The drafting team reviewed each of the comments submitted by industry. The team developed responses to individual questions, and the responses can be found in the SAR Consideration of Comments report on the project page. For the reasons outlined in the Consideration of Comments report, the drafting team did not believe any revisions to the SAR were necessary as a result of the comments received.

Agenda Item 4- Develop project work plan and schedule

The drafting team performed an exhaustive review of all the cross-over terms under consideration. Of the fifty-five (55) cross-over terms, forty (40) contain inconsistencies or differences in the definition narratives, which causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. After analyzing these definitional differences, the SDT identified common alignment issues and categorized the terms into different “groups” based upon the type of alignment issue identified. Below is a summary of each grouping (revised from SAR meeting):

Group 1: Group 1 cross-over terms contain differences in the substance or content of the definition. In some instances, the differences resulted in the defined terms having different meanings or application. For example, the definitions for “Net Energy for Load” are substantively different in the Glossary and ROP because they are used differently in the respective documents. In other instances, although the content or language of the definition was different, the end result or application of the definition was, nevertheless, the same. For example, the term “Adjacent Balancing Authority” is defined differently in the Glossary than the ROP, with the Glossary definition providing greater clarity. There are a total of nine Group 1 cross-over terms.

Group 2: Group 2 cross-over terms are similar to Group 1 terms in that the definitions contain substantive differences in the definitions. However, these terms are grouped separately because they are currently under revision, not yet approved by the NERC Board of Trustees, or pending regulatory approval. There are six Group 2 cross-over terms in total.

Group 3: Group 3 cross-over terms contain differences in the capitalization of terms that are included in the definition narrative, but are otherwise aligned in substance and content. Since capitalization of a term indicates that it is a defined term with a specific meaning, these inconsistencies in capitalization cause confusion and may lead to inconsistent application of the definition. For example, the definition narrative of “Interconnected Operations Services” is the same in the Glossary and ROP; however, the ROP narrative capitalizes “Transmission Services” and “Reliable Operation,” while the Glossary does not. There are a total of twenty-two Group 3 cross-over terms.

Group 4: Group 4 cross-over terms contain errata-type differences, such as the inadvertent omission of a word or letter. There are three Group 4 cross-over terms in total.

The drafting team developed a work plan and schedule for each of the individual groupings. Details regarding the work plan are provided below.

GROUP 1 WORK PLAN:

First, the drafting team developed a template identifying all background information and research to obtain for Group 1 cross-over terms. The team members were then assigned Group 1 terms. A template was completed for each Group 1 term. Below is an overview of the information obtained for the Group 1 terms:

For each cross-over term, a complete history:

- a. Origin/genesis
- b. All versions (past, current, future)
 - i. revisions and dates
 - ii. identify specific changes to narrative
 - iii. project (SDT) that made/proposed changes
 - iv. identify any regional definitions of the term
- c. FERC orders addressing term (approval, revision)
- d. List of all Reliability Standards where term occurs
 - i. Identify all Standard(s) containing defined term (currently enforceable, FERC-approved but not yet enforceable)
 - ii. Identify all interpretation(s) addressing defined term
 - iii. Identify other usage of word within Reliability Standards
- e. List of all ROP provisions where term occurs (cite to section number and page/version)
- f. Identify interdependencies (for later use in determining impacts of any proposed revisions)
 - i. List of all other definitions that include the term in definition narrative
 - a. Glossary
 - b. ROP
 - ii. List of all other defined terms that are included *in* the definition narrative
 - a. Glossary

- b. ROP
- g. Consult/review NAESB definition for a term

Group 1 Assignments:

Term 1: Adjacent Balancing Authority – Jerry, Wayne, Mark
Term 6: Bulk Power System – Mark, Chris
Term 17: Generator Operator – Diana, Wayne
Term 18: Generator Owner – Diana, Wayne
Term 29: Net Energy for Load or NEL – Jerry, Shannon
Term 40: Reliability Standard – Andy, Patrick
Term 44: Sink Balancing Authority – Jerry, Wayne, Mark
Term 45: Source Balancing Authority – Jerry, Wayne, Mark
Term 48: System Operating Limit – Shannon, Shane, Laura

Group 1 deliverables:

1. Revised definitions (both ROP and Glossary)
2. Justification/explanation document
3. Implementation plan (for revised Glossary terms)

GROUP 2 WORK PLAN:

Group 2 - Assignments:

Term 8: Critical Assets - Heather, Lacey
Term 9: Critical Cyber Assets - Heather, Lacey
Term 10: Cyber Assets – Heather, Lacey
Term 11: Cyber Security Incident - Heather, Lacey
Term 25: Interconnection – Patrick
Term 46: Special Protection System - Lacey

Group 2 - Description of work and objective(s): For these terms, SDT to review pending (or proposed) revisions to defined term(s), identify differences in definition narratives, including, differences in content, substance, capitalization, formatting and any other differences. The team will assess the differences and to the extent appropriate, revise the narrative(s) so that they are aligned.

Group 2 – Deliverable(s):

1. Revised definitions
2. Justification document
3. Implementation plan

GROUP 3 WORK PLAN:

Group 3 – Assignment: Jerry Rust

Group 3 - Problem statement: A number of cross-over terms have narratives that are identical (aligned), but contain differences in capitalization.

Group 3 - Description of work and objective(s):

1. For each cross-over term, identify where there are capitalization differences in the definition narrative. To the extent necessary, revise the narratives to be identical.
2. Ensure that all capitalized terms are defined in that particular source.
3. Identify and address words used in the narrative of the definition of a Glossary and/or ROP term that are capitalized but should not be because the term is not a defined term. For example, Point of Receipt uses “Generator,” but generator is not a defined term.

Group 3 – Deliverable(s):

1. Revised definitions
2. Justification document
3. Implementation plan

GROUP 4 WORK PLAN

Group 4: Miscellaneous/Errata

- Term 13: Distribution Provider - Patrick
- Term 20: Interchange Authority - Patrick
- Term 27: Load* - Patrick
- Term 34: Protection System – Jill, Shane

Group 4 - Problem statement: A number of cross-over terms contain narratives with very minor differences or formatting errors that should be addressed to align the two narratives. For example, spacing issue in the ROP for Planning Authority, causing it to be easily overlooked as a defined term. Also, consider how to address when the beginning of a sentence happens to be a defined term (but possibly should not be capitalized because it is not intended to be the defined term).

Projected schedule of work:

- **April - May: Complete steps 1 – 4 (research, assessment and initial revisions)**
- **May - June: Finalize revisions and develop supporting materials (justification document)**
- **July: Conduct QR; obtain SC approval to post; Step 5**
- **Late July: Post for industry comment (approval)**

In addition to the above-described work, the SDT developed a list of open items/issues to address in the next phase of the project:

1. Standard-only defined terms (FERC approved) – Jill, Diana

- PRC-005-2 – [List terms]
 - PRC-005-4 – [List terms] (i.e., unresolved maintenance issue)
 - EOP-001-2.1b, Appendix 1 – “emergency assistance” (not capitalized)
2. ROP section-only defined terms (FERC approved) – Chris, Andy
 - For example, Appendix 4C of ROP
 - Note: Apx 2 provides that, “For convenience of reference to the user, definitions of terms that are used in a particular Appendix may be repeated in that Appendix.”
 3. “Unofficial or informal definitions” – Terms that are defined in an informal or unofficial manner, that do not rise to the level of requiring FERC approval. For example, this may include definitions found in the attachment, rationale, technical basis,
 - Attachment
 - Guideline and technical basis
 - Additional Compliance Information (section D1.5)
 - PRC-024 – Point of Interconnection (see also, FAC-003, FAC-008)
 - IRO-17 - Operations Planning Time Horizon
 - PRC-026-1 – informal definitions found in Attachment 1
 4. Terms that are capitalized in Reliability Standards that are not defined (and/or FERC-approved) in the Glossary
 - previously defined term, but retired;
 - defined in the ROP, but not Glossary
 - never a defined term (Extra High Voltage and High Voltage ... PRC-002-1 and TPL-001-4)
 - NERC board approved, but not FERC approved
 - Example: Responsible Entities, Compliance Enforcement Authority (defined as CIP only, but used in PRC-002)
 5. Terms that are capitalized in a provision of the ROP that are not defined in Appendix 2
 6. Within the narrative of a definition (in either the Glossary or ROP), there is a term that is not capitalized, but it possibly should be (because it is defined in that resource and it has the intended meaning of the defined term).
 7. Terms that are defined in the Glossary and/or ROP that are not currently used in the Standards/ROP. For example, Reliability Directive was included in COM-002-3, but FERC ultimately approved COM-002-4 (which does not use the term).
 8. Consistency issues:
 - singular and plural references

- Net Energy for Load or NEL – sometimes acronym provided, sometimes not.
9. Existing definitions that need to be improved/revised (possibly through a proposed periodic review)
- Load

Agenda Item 7- Action Items

1. L. Ourso to finalize Consideration of Comments report based upon SDT discussion and distribute to team for review prior to posting.
2. All drafting team members to complete work assignments (templates) and send to L. Ourso by April 29.
3. SDT members to identify ROP section only defined terms – Chris, Andy and Heather
4. SDT members to identify standard-only defined terms – Jill, Diana, Suzanne
5. L. Ourso to follow up with NERC legal regarding ROP version history/change log
6. L. Anderson to draft background document and provide to team at May 7-8 meeting
7. L. Ourso to contact NERC staff involved with RBR regarding reason for changing “units” to “facility(ies)” in definitions of Generator Owner and Generator Operator