

Notes Regional Reliability Standards Working Group

June 1, 2009 | 2p.m.–4 p.m. EST

Dial-in Number: 866-289-4175

Participant Code: 6762229123

Administrative

1. Introductions and Attendance

Judith James	TRE (on phone)
Peter Heidrich	FRCC (on phone)
Guy V. Zito	NPCC
Robert W. Millard	RFC
Patrick Huntley	SERC (on phone)
Kenneth J. Wilson	WECC
Stephanie Monzon	NERC Staff
Carol Gerou	MRO

Observers:

Charles Yeung	SPP
Nick Henery	FERC Staff
Scott Sells	FERC Staff
Lee Pedowicz	NPCC
Larry Brusseau	MAPPCOR
Dan Schoenecker	MRO
Ibrahim Oweis	FERC Staff
Steve Myers	ERCOT

Vann Weldon	ERCOT
Sarah Hensley	TRE
Anthony Jablonski	RFC
Jason Christopher	FERC Staff
Stuart Hansen	FERC Staff

2. Stephanie reviewed the NERC Antitrust Compliance Guidelines.

RRSWG Topics

3. Remaining May 19–20, 2009 Agenda Topics

- a. Impact of FERC Approved Standards on the Fill in the Blank Standards – Bob Millard
 - Bob M. had a discussion with a member of his Generator Verification team about potential double jeopardy. FERC approved standards require that entities follow Regional requirements. This concern is also in the DME standard. Perhaps an interpretation is necessary for those standards.
 - Guy Z. – this appears to be a compliance related problem and perhaps a letter to David Hilt would be appropriate. Another thought might be to resolve the overlap in requirements in the implementation plan. There are a set of actively monitored standards and perhaps the standards that are approved (such as DME) might not fall into the actively monitored list.
 - Dan S. – there is a NERC matrix that contains the requirements that are not enforceable. For example the matrix indicates that PRC–007 R1 is not enforceable. April 18, 2008 – NERC Compliance matrix. Dan will send to the group.
 - Tony J. – clarified that the double jeopardy scenario exists because there are cw requirements with compliance elements (that are approved by the commission) that require entities to follow regional requirements (requirements with compliance elements for those standards in the process of being approved).
 - Nick H. – Referenced Docket RR07–11–000 Dated June 8, 2007. Paragraphs 39 and 40 that state the commission’s position on double jeopardy and encouraged the group to read the Order.
 - The group will review the Enforcement–Compliance Matrix. Stephanie and Bob will discuss how it will apply to the approval of the RFC DME standard.
- b. Review and discuss the NERC Regional Standards Evaluation Procedure

- Bob Millard explained that the risk of posting a regional standard before the process is completed is that there will be a need for a second posting (once the process is completed). Bob suggested that two abbreviated postings (one technical – adverse interregional impacts and another for process check) may be a good alternative to current practice.
- Guy suggested that this be added to the next RRSWG meeting because it deserves more discussion as a group. Guy thinks the group needs to discuss what constitutes a process issue?

4. RRSWG Comments on Work Plan (Posted through July 6, 2009)

- a. The Standards Development Workplan was posted for public comment through July 6, 2009. The RRSWG will submit comments.
- b. The group recommends that a new version is posted rather than posting the old version.
- c. Pat H. – the industry is struggling with what is required for the posting.
- d. Ken Wilson – suggests that a status of the projects should be issued before posting the plan because the plan is asking the industry to comment the future work plan. The status should show correlation to the last plan (actuals versus estimated to completion).
- e. Pete indicated that this is not the only posting of the work plan.
- f. Need to prioritize the fill in the blank projects to bring them to completion as soon as possible. Guy responded by saying that there are other projects that may be more important related to black out recommendations.
- g. Stephanie will draft comments based on this discussion and RRSWG feedback. She will circulate the draft to this group for their review and the group will submit comments by July 6, 2009.

http://www.nerc.com/files/2009-2011_Reliability_Standards_Development_Plan_Complete_Set_2008Sept18.pdf

Standing Agenda Items

5. Review action items from last RRSWG meeting (March, 2009)

Action Items	Status:	Assigned To:
WECC to provide feedback on the ROP Variance language – particularly the additional information to provide NERC with the submission of the standard for approval	In Progress (updated 1/28/09) – Ken to provide before March RRSWG meeting. Completed	Ken Wilson
Naming convention for regional standards interpretations (check that whatever is being proposed supports the technical solution being used by Compliance)	created November, 2008	Stephanie to follow up with Maureen Long
Guy to send Stephanie proposed language on the Canadian Regulatory involvement in the NERC Evaluation Procedure	created November, 2008	Guy Zito
Stephanie to discuss schedule of the fill in the blank standards in the work plan and the impact on this schedule by the continent wide projects. Stephanie will have a discussion with Gerry about the original "directive" and possible ways to address the delay in establishing regional standards as a result of the delay in the continent wide projects. Stephanie to send a revised version of the letter to the RRSWG for review.	In Progress – 1/27/09	Stephanie
At what point (procedurally) do we identify a Variance? NERC to identify the appropriate procedure to address the identification of a Variance (as opposed to a Regional Standard)	created January 2009	Stephanie

Action Items	Status:	Assigned To:
3/19/09 - The team is tracking the progress of the SC Process Subcommittee and the modifications to the ROP Variance language.		
Guy Zito and Pat Huntley to create a first draft of a RRSWG presentation to the Standards Committee. Stephanie to work with Maureen to add an RRSWG discussion on a future SC agenda. 3/19/09 – the team decided to NOT present at the April SC meeting but to have one on one conversations with SC members to better understand their concerns.	created January 2009 Completed	Stephanie Guy Pat
Ken Wilson to provide language for the NERC Evaluation by March 2009 RRSWG meeting	created January 2009 Completed	Ken Wilson

6. Other

7. Review Proposed 2009 RRSWG Schedule:

Date	Location	Comments
January 27–28	TRE — Austin	Confirmed
March 18–19	APS — Phoenix, AZ	Confirmed (Ken Wilson)
May 19–20	SERC — Charlotte	Confirmed
September 16–17	NPCC — New York City	Confirmed
November 10–11	FRCC — Tampa	Confirmed

8. Next Steps

9. Adjourn