

## Notes Regional Reliability Standards Working Group

September 16, 2009 | 12:00 pm–5 p.m. Eastern  
September 17, 2009 | 8 a.m.–12:00 p.m. Eastern  
Dial-in Number: 866-289-4175 | Code: 6762229123

Northeast Power Coordinating Council, Inc.  
1040 Avenue of the Americas, 10th Floor  
(between 40th & 39th Streets)  
New York, New York  
(212) 840-1070

### Administrative

#### 1. Introductions and Attendance

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

#### Observers:

Charles Yeung	SPP
Nick Henery	FERC Staff
Scott Sells	FERC Staff
Lee Pedowicz	NPCC

Dan Schoenecker	MRO
Ibrahim Oweis	FERC Staff
Steve Myers	ERCOT (day 2 by phone)
Vann Weldon	ERCOT
Sarah Hensley	TRE (by phone)
Jason Christopher	FERC Staff
Stuart Hansen	FERC Staff
Gerry Dunbar	NPCC
Anthony Jablonski	RFC (by phone)
Laura Zotter	ERCOT (by phone)

- Stephanie reviewed the NERC Antitrust Compliance Guidelines.

Stephanie will update the roster to reflect that David Kelley will be representing SPP on the RRSWG.

### **RRSWG Topics**

- Impact to the Regional Delegation Agreements
  - Changes to the ROP – Development of VSLs and VRFs – Guy Zito
    - Guy had an action item from May to develop a summary proposal. This proposal (which eventually be agreed upon by the regions) will provide guidance on potential changes/impacts to the delegation agreements. Several of the regions indicated that they would be impacted by this change in approach in their delegation agreements.
    - Guy took the issue to the NPCC RSC and the group decided that they will not make any changes to the RDA's at this time or not until the changes to the NERC process have been finalized and approved by the Commission.
    - Pat Huntley reminded the group that some of the RDA's are drafted such that it is not prescriptive on how the VSLs are developed and therefore changes do not necessarily have to be made to the regional standards process.
  - ACTION ITEM**: Stephanie to send out the FERC guidance on VSLs to the RRSWG. They will disseminate to their drafting teams to include this is the development process. The expectation is for the team to document how the guidance was followed in the development of the VSLs.
- Fill in the Blank Standards – Plan to address in the Interim

The RRSWG will discuss each of the remaining ten fill in the blank standards that are yet to be reviewed by a NERC continent-wide team.

- a. Guy Zito began by asking Stephanie to review the issue with the group. Stephanie reviewed what was discussed at the September 4<sup>th</sup> conference call with the RRSWG on this topic. The purpose of this activity is partly discovery. What is in place at the regional level that may address the reliability need in the fill in the blank standards? If the team feels that not addressing a particular standard (in the group of ten identified as not to be addressed until a future NERC project) can the regional criteria be translated into requirements?
  - b. The team initially expressed concerns that the regional criteria are not translatable into standards because of the narrative form in which they appear. The translation process would require a large resource commitment as the work load is large to put the existing criteria, guidelines, protocol and procedures into standard form. Furthermore, since the Regions currently use their standards process to make modifications to the regional criteria a project to translate criteria into requirements would also have to undergo the regional standards development process. The amount of time to complete a translation regional project would equal the amount of time to complete a NERC standards project.
  - c. The RRSWG recommended increasing the priority of these projects if there is a need to fill a potential reliability gap. However, after reviewing the list of ten standards the RRSWG pointed out that many of the standards cover database requirements. These requirements do not have a significant impact on reliability. Furthermore, the modeling requirements are currently in practice in the eastern interconnection. As a result do not think there is a reliability gap for data modeling requirements. Finally, the team thinks that the
  - d. Stephanie indicated that she still needs the Regions to perform the criteria/protocols/guidelines mapping to the ten standards. Judith indicated that she would be working to get this completed.
  - e. The other regions expressed concerned that if they provide this information it should not be shared beyond NERC use. Stephanie assured them that she and Gerry would be reviewing what is provided by the Regions; however, pointed out that if the documents in question fall under criteria/guidelines/protocols these documents are public documents and does not understand the concern. Nevertheless, as mentioned above this exercise is a fact-finding activity.
5. Review of Approved and Proposed Regional Definitions (Definitions under development) – Stephanie Monzon

- a. The RRSWG members discussed the matrix and the process for incorporating them into the NERC Glossary of Terms.
  - b. The group initially did not agree on the process for promoting the definitions to a continent wide level. The group agreed that in the case where a regional definition overlaps with another regional definition or is common the regional definition should undergo the continent wide process to become a continent wide standard.
  - c. The group did not agree with adding the approved regional definitions to the NERC Glossary of Terms.
  - d. WECC clarified that the intent of the replacement standards was to replace and retire the regional definitions proposed by the Tier 1 standards. Stephanie will work with Ken and Steve to better understand what definitions are being replaced or deleted with the Tier 1 replacements standards.
  - e. Guy does not agree with promoting regional reliability definitions to the continent wide level.
  - f. Stephanie pointed out to the group that Order 723 approving the WECC ATEC standard is very clear that proliferation of regional definitions is a concern to the Commission. In addition, the Order directs NERC to establish a ROP process, if needed, to address this issue. One thought is that when a Region identifies the need for a definition to support a regional standard and the term is not unique to that region or cannot be justified as either proposing something that is more stringent than the understood definition of the term or is necessitated by a physical difference in the BES then that definition should be proposed at the continent wide level for use by other regions and NERC continent wide drafting teams. The Region would create a SAR and would use the definition for the term at the end of the process. This would eliminate duplicative, redundant, definitions.
6. Process for Approving Regional Definitions
- a. Stephanie discussed the need to streamline the process but the Regions did not agree that this is an issue and pointed out that they are delegated authority to create regional definitions.
7. Status on Regional Standards Under Development (Updates to the website)
- a. RFC (the RFC Standards website is “down” until a software release in mid October)
    - MOD-024 Gen Verification - approved by RFC BOD August 27, 2009. Anticipate submission to NERC in late October. The NERC effort is in the initial stages and working towards the first posting. Bob is chair of the MOD-024 team. The RFC legacy documents are being updated through this process.
    - MOD-025 Gen Verification of Reactive Power – response to comments (4<sup>th</sup> period). Working on 5<sup>th</sup> posting in the October timeframe.

- (UFLS) PRC-006 – Responded to fifth set of comments. Held a webinar in June with the industry to review the standard. This effort is to translate the legacy documents into a standard.
- b. **Action Item:** Each RRSWG rep will send Lauren Koller (cc Stephanie) latest versions of UFLS, DME, SPS, Balancing regional standards (clean versions in .pdf) Lauren will create a .pdf and distribute to the RRSWG for review.
- c. Stephanie recommended that for those regions that have projects that are nearing completion a meeting with FERC staff should be scheduled. Stephanie will work with Nick Henery to schedule these meetings.
- d. Stephanie documented the status of the regional standards in a separate spreadsheet used to track all regional standards under development.

### Standing Agenda Items

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

Action Items	Status:	Assigned To:
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	created January 2009	Stephanie

Action Items	Status:	Assigned To:
Regional Standard) 3/19/09 - The team is tracking the progress of the SC Process Subcommittee and the modifications to the ROP Variance language.		
Stephanie to send out the FERC guidance on VSLs to the RRSWG. They will disseminate to their drafting teams to include this is the development process. The expectation is for the team to document how the guidance was followed in the development of the VSLs.		
Each RRSWG rep will send Lauren Koller (cc Stephanie) latest versions of UFLS, DME, SPS, Balancing regional standards (clean versions in .pdf) Lauren will create a .pdf and distribute to the RRSWG for review.		

9. Other

10. 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

11. Next Steps

12. Adjourn