

Meeting Notes

2021-06 2021-06 Modifications to IRO-010 and TOP-003 Drafting Team

March 1, 2022 | 3:10 - 4:10 p.m. Eastern

March 2, 2022 | 1:00 - 3:00 p.m. Eastern

Conference Calls with Web Access

Introductions and Chair's Remarks

NERC Antitrust Compliance Guidelines and Public Announcement

Agenda Items

1. Review of Comments – Q1

a. ReliabilityFirst

- i. Re will attestation while some re will not accept this attestation. All re will not accept this but rather want data.
- ii. Retention for the full data set for the 90 days, requirements are unnecessary.
- iii. Concerns are valid but move forward.
- iv. Industry will push back on after additionally, but will forward to drafting team (DT), after additionally is not a redundancy.
- v. Question is that IRO shouldn't be changed not needed. Cautioning a redundant, one is high then change medium to high.
- vi. Last paragraph in advisory.
- vii. Regrade based upon new risk factor, caution make sure it is appropriate.

b. US Bureau of Reclamation

- i. Their point is we are working on standards that have not become effective yet and made revision off draft that is approved by FERC but not implemented yet. Other projects that revise the same standards, reduce standards churn, this should be combined.
- ii. Valid but how do we approach it. 2021-07, VAR MOD.
- iii. Latrice Harkness (NERC) is having internal meetings about revisions. Also making sure the projects are on the same page.
- iv. Alison Oswald (NERC) coordinates, but depending on the time lien the filing might be filed at the same time, this might be combined into one new version.

- c. Southern Company
 - i. Southern Company does not want make current requirements and make them more prospective. More specific you get its harder for RC, TOP, and BA to get information.
 - ii. Our intent is make data requirements less burdensome, not to add a perspective element, maybe review Standard Authorization Request (SAR), review prescriptive of intent.
 - iii. We try to specify every data then we won't resolve data issues trying to address, not trying to do that and we understand.
- d. MISO/ISO/RTO board.
 - i. Bring up cautions from comments before. Make sure DT can respond to issues like correlation to other projects.
 - ii. Other ways to approach the issues of zero deficit and confidentiality, NERC dispute resolution, drafting team should look at all avenues issues of SAR.
 - iii. Do not inhibit entities to preform responsibilities, do not focus only one means of data exchange. Look at concerns that will be passed on standard drafting team (SDT).
 - iv. SRC is not opposed to not having the project, leaving the standards as is no change needed.
 - v. New cold weather SARs coming in, will that change TOP-003 or IRO-010, real time assessments ask more information.
 - vi. Review based on future standards, take that into account with our discussions. No conflict? Make our review in light of that future standard.
- e. Black Hills Corporation
 - i. Making suggestion of risk based they support. SAR not that specific.
- f. AEP
 - i. General support, encouragement for DT that revisions don't burden, large entities have lots of data points.
 - ii. RC has a larger risk profile that re and non re are balanced.
 - iii. RTO TOP can shift data points from other entities to RTO and RTO is collector of all info that feeds back to top. RTO might not need data but top does need data, funnel it directly to top.
 - iv. RC already has it should they share it?
 - (1) Maybe for the data RC already has, majority top gets data from RC, 90% gets it from RC. Burden is keeping up with all. Third-party intermediary, elevate burden with compliance.
 - (2) If data isn't submitted with RC, but data path set up but data do not need data, RC is clearing house for entity.

- v. Nothing specific into SAR right now, concept can be discussed. More looking at SAR if written in a way that this conversation can be had.
 - vi. TOP-001, R20
 - g. Hydro Quebec
 - i. Data specification requirements have leaks or point to other external documents to data that they need to disseminate, need to be standalone data.
 - ii. Not a team purview, standard, data specification should be standalone specification.
 - iii. Entity should define what they are reasonable or not, compared to external documents that pull them into something they do not want to be a part of. Could be addressed by SDT entity can specify, risk is on the entity, people specify who's the BA or RC, data specification who they do business with, entity has process to develop data specification o meet data requirements. Peer requirements not someone else defining it.
 - iv. Disagree with standalone document, standards shouldn't as a standalone document.
 - v. Dispute resolution as a way of dealing with conflicts or last of information. Is the communication of speciation there?
 - h. NPCC
 - i. Make sure the most recent version.
- 2. Review of Comments – Q2**
- a. SPP
 - i. Getting proper information on data.
 - ii. How much information is received from MOD-032.
 - iii. Thank you for the comment. The SDT will look to coordinate with the proper person, group, or team.
 - b. TVA
 - i. Pass the concerns expressed in first paragraph to the SDT.
 - ii. Update the date when goes to Standards Committee, and submitter to as revised by the DT.
 - iii. Update versions most current.
 - iv. Coordinate with FAC-008, DT coordinate with the Project 2021-08 (Modifications to FAC-008) drafting, reach out to FAC-008 and show comment.
 - (1) Data request falls under TOP-003 and IRO-010 coordination is good.
 - v. It was brought up Generation felicity rating not our SAR, not under our team. Maybe comment wants to expand scope but this is not needed. Redundancy is always needed but team should look check the redundancy.

vi. The drafting team will consider multiple standards and the data specification within those when determining the language revision to the SAR and standard language.

c. EEI

i. Versioning in the SAR modify version, no change.

Attendance for March 1, 2022				
Name	Company	Member/ Observer	Straw Vote (X)	Conference Call/Web (Y/N)
Matthew Harward	Southwest Power Pool, Inc.	Member		Y
Dennis Sauriol	American Electric Power	Member		Y
Jennifer Richards	SCPSA (Santee Cooper)	Member		Y
Barry Jones	Western Area Power Administration (WAPA)	Member		N
Bob Cielen	BC Hydro	Member		Y
Stephen Solis	Electric Reliability Council of Texas, Inc.	Member		Y
Nick Messner	California ISO	Member		Y
Alison Oswald	NERC	Observer		Y

Attendance for March 2, 2022

Name	Company	Member/ Observer	Straw Vote (X)	Conference Call/Web (Y/N)
Matthew Harward	Southwest Power Pool, Inc.	Member		Y
Dennis Sauriol	American Electric Power	Member		Y
Jennifer Richards	SCPSA (Santee Cooper)	Member		Y
Barry Jones	Western Area Power Administration (WAPA)	Member		Y
Bob Cielen	BC Hydro	Member		Y
Stephen Solis	Electric Reliability Council of Texas, Inc.	Member		Y
Nick Messner	California ISO	Member		Y
Latrice Harkness	NERC	Observer		Y
Michael Gandolfo		Observer		Y
Michael Brytowski		Observer		Y