### **Comment Form for 6th Draft of Standards for Real-Time Operations (Project 2007-03)**

Comments on the 6th draft and successive ballot of the standards for Real-Time Operations (Project 2007-03) must be submitted by **January 12, 2012.** If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

### **Background Information:**

In the 6th posting for Project 2007-03, the Real-Time Operations Standard Drafting Team (RTOSDT) has attempted to clarify the proposed changes to the TOP family of standards based on industry comments received for the 5th posting and suggestions made during the Quality Review. Changes made were:

**TOP-001-2:**

* + Changed the title of the standard to ‘Transmission Operations’ to better reflect the content of the standard.
	+ Based on Quality Review feedback changed the Purpose of the standard to more fully align with the requirements of the revised standard.
	+ Revised Requirement R1 to note that a Reliability Directive should be identified as such
	+ Deleted ‘upon recognition’ from Requirement R2
	+ Deleted ‘all other’ from Requirement R3
	+ Added Reliability Coordinator to Requirement R5
	+ Deleted Generator Operator from Requirement R6 and clarified that the requirement was for ‘telemetry equipment’
	+ Deleted the 30 minute limit from Requirement R9 and replaced it with references to Facility Rating and Stability criteria
	+ Deleted the 30 minute limit from Requirement R11 to correspond with the change in Requirement R9
	+ Made a semantic change for clarity to Measure M2
	+ Changed the Time Horizons for Requirements R3, R5, and R8
	+ VSLs for Requirements R3, R5, and R6 were changed to move away from percentages
	+ The language for the VSLs in Requirements R2, R6, & R8 was clarified
	+ Based on Quality Review feedback modified the Data Retention section to reflect the current NERC Rules of Procedure.

**TOP-002-3:**

* + Revised Requirement R2 to read as a positive statement rather than as a double negative
	+ Added the term “NERC” as a modifier of “registered entities” in Requirement R3
	+ Changed the VRF for Requirement R3 to Medium
	+ Modified the VSLs for Requirement R1
	+ Based on Quality Review feedback modified the Data Retention section to reflect the current NERC Rules of Procedure.

**TOP-003-1:**

Based on Quality Review feedback, the Purpose of the standard has been modified to more fully align with the requirements of the revised standard.

The bullets under Requirement R1, Part 1.1 have been deleted.

Added new Requirement R2 to separate out the responsibilities of Balancing Authorities from Requirement R1.

In response to Quality Review feedback, modified the language in Requirements R3 and R4 to clarify which data the Transmission Operator and Balancing Authority are to distribute.

Made conforming changes to Measures to reflect changes to the Requirements.

Based on Quality Review feedback, modified the Data Retention section to reflect the current NERC Rules of Procedure and Drafting Team Guidelines for evidence retention.

Made conforming changes to VSLs to reflect changes to Requirements.

**Other changes:**

The definition of Reliability Directive has been modified by Project 2006-06 to read as follows:

“A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impacts.”

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. The SDT made changes to TOP-001-2 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

[ ]  Yes

[ ]  No

Comments:

1. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

[ ]  Yes

[ ]  No

Comments:

1. The SDT made changes to TOP-003-1 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

[ ]  Yes

[ ]  No

Comments:

1. The VRF, VSL, and Time Horizons are part of a non-binding poll. If you do not support these assignments or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments on this Standard that you have not already provided in response to the prior questions, please provide them here.

Comments: