Unofficial Comment Form

Project 2021-06 Modifications to IRO-010 and TOP-003

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **2021-06 Modifications to IRO-010 and TOP-003**. Comments must be submitted by **8 p.m. Eastern, Thursday, December 15, 2022.**
**m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2021-06-Modifications-to-IRO-010-and-TOP-003.aspx). If you have questions, contact Standards Developer, Josh Blume (email), or at 404-446-2593.

## Background Information

The primary purpose of this project is to simplify administrative burdens identified by the SER Phase 2 Team associated with the current IR0-010-5 and TOP-003-6 standards and limit unnecessary data requirements that do not contribute to BES reliability and resiliency. As written the standards create a zero-defect expectation for each registered entity receiving a data specification to demonstrate perfect performance on every item in the data specification for an entire audit period. This can result in unnecessary administrative burdens for the registered entity to demonstrate compliance, including excessive data retention. If instead a risk-based approach was developed and performance was triggered upon an event or unresolved data conflicts between entities, then the purpose of the standards would be achieved in an effective and efficient manner.

The secondary purpose of this project is to evaluate removing other data exchange requirements dispersed in other standards. The standard drafting team (SDT) would need to evaluate those requirements after proposed changes to the IR0-010-5 and TOP-003-6 are developed to determine if they are within the scope of the four tasks and consequently within the scope of IRO-010-5 and TOP-003-6. This may require enhancing the standards to allow each registered entity with responsibilities to perform the tasks identified in IRO-010-5 and TOP-003-6 the ability to request and receive any information it needs from other Registered Entities to perform those tasks.

**Questions**

1. To address third party participation in data exchanges, the SDT added a provision in both IRO-010-5 and TOP-003-6 that recognizes that an applicable entity that is required to respond to the data specification may identify data and information that will be provided by a third-party intermediary. However, this provision does not shift the responsibility to respond to the data request from the applicable entity to the intermediary. Rather, the provision recognizes that an applicable entity may utilize an intermediary to pass through data and information unaltered from the entities that originated the data and information. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

2. To mitigate potential zero defect assumptions and decrease administrative burdens, the SDT revised the data specification requirements in both IRO-010-5 and TOP-003-6 to include more specificity to the protocols for providing data and information that includes: specific deadlines or periodicity in which data and information is to be provided, performance criteria for availability and accuracy of data, and provisions to allow a respondent entity to update or correct data and information as necessary. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

3. To improve administration of data and information for the applicable entities, the SDT modified IRO-010-5 and TOP-003-6 to require the data specification to specify mutually agreed upon format, conflict resolution process, and security protocols or methods for securely transferring data or information. Do you agree with these modifications? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

4. IRO-010-5 and TOP-003-6 require general data specifications to allow the Reliability Coordinator, Transmission Operator, and Balancing Authority to perform its Operational Planning Analysis, Real Time Assessment, Real-time monitoring (undefined term), and BA analysis functions (undefined term). The SDT focused on data and information generally rather than prescriptive requirements. Do you believe that all data and information needed by the RC, TOP, and BA to perform these reliability tasks (for example, PMU streaming, outage coordination, distribution, generator fuel information, etc.) is available pursuant to the proposed standards or is additional clarification needed that is more prescriptive?

[ ]  Yes

[ ]  No

Comments:

5. To support the proposed modifications, the SDT revised the VSLs in both IRO-010-5 and TOP-003-6 to account for the clarified data specification criteria. Do you agree? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

6. The SDT reviewed the other standards listed in the SAR’s Detailed Description to determine whether additional changes could be proposed to the standards to address potential redundancy of requirements related to the four reliability tasks identified in IRO-010-5 and TOP-003-6 or create efficiencies reflective of the principle established by the Standards Efficiency Review initiative. Due to the criticality of the tasks and functions identified in these collateral standards, the SDT determined there is insufficient justifications for the retirement of these requirements and, therefore, the SDT is not proposing changes to these standards. Do you agree with this assessment? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

7. The SDT is proposing an 18-month implementation plan. Would this proposed timeframe give enough time to implement the proposed modifications in IRO-010-5 and TOP-003-6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

8. Provide additional comments regarding IRO-010-5 for the SDT to consider.

Comments:

9. Provide additional comments regarding TOP-003-6 for the SDT to consider.

Comments:

10. Provide any additional comments for the SDT to consider, if desired.

Comments: