Unofficial Comment Form

Project 2014-03 Revisions to TOP/IRO Reliability Standards

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=f9ff5d66266c4129af69f904cc2bba73) to submit comments on the Standard. The electronic comment form must be completed by **July 2, 2014**.

If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

The project web page can be found at: <http://www.nerc.com/pa/Stand/Pages/Project-2014-03-Revisions-to-TOP-and-IRO-Standards.aspx>

## Background Information - Project 2014-03 – Revisions to TOP/IRO Reliability Standards

On April 16, 2013, NERC submitted two petitions requesting Commission approval of TOP and IRO standards.

On November 21, 2013, FERC issued a [NOPR](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/NOPR_TOP_IRO_RM13-12_RM13-14_RM13-15_20131121.pdf) proposing to remand three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards and four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards. In the NOPR, FERC stated that NERC “has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.”

In response, NERC filed a [motion](http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final_Final_Motion_to_Defer_Action_20131220%20%281%29.pdf) requesting that FERC defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR and afford time to review the proposed TOP and IRO Standards through the NERC standards development process. That motion to defer action was granted on January 14, 2014.

The drafting team formed to address those concerns has made revisions to the TOP and IRO standards proposed to be remanded, along with several other IRO standards to provide consistency amongst the TOP and IRO standards, to address NOPR issues and recommendations made by the Independent Expert Review Panel, the IRO five-year review team, and the 2011 SW Outage Report.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

The SDT requests that commenters not use these comments as a forum for questioning the issues raised in the FERC NOPR of November 21, 2013, but to objectively evaluate the work of the SDT in responding to the issues raised in the NOPR, and the recommendations made by the Independent Expert Review Panel (IERP), the IRO FYRT, and the SW Outage Report.

## Questions

1. Do you agree with the changes made to proposed IRO-001-4? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed IRO-002-4? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed IRO-008-2? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed IRO-010-2? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed IRO-014-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. The drafting team has proposed a new standard to address outage coordination concerns. Do you agree with the new standard, IRO-017-1? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed TOP-001-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed TOP-002-4? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to proposed TOP-003-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. The mapping document posted on the project page explains how the drafting team believes Requirements from 5 IRO standards that are proposed for retirement are addressed without creating any reliability gaps. Do you agree with the retirement of standards IRO-003-2, IRO-004-2, IRO-005-3.1a, IRO-015-1, and IRO-016-1? If not, why not? Please be specific.

Yes:

No:

Comments:

1. The mapping document posted on the project page explains how the drafting team believes Requirements from 5 TOP standards and 1 PER standard that are proposed for retirement are addressed without creating any reliability gaps. Do you agree with the retirement of standards TOP-004-2, TOP-005-2a, TOP-006-3, TOP-007-0, TOP-008-1, and PER-001-0? If not, why not? Please be specific.

Yes:

No:

Comments:

1. The SDT is seeking input on whether 30 minutes is the correct periodicity for the performance of Real-time Assessments for Reliability Coordinators and Transmission Operators. Please explain what you feel the correct periodicity and supply technical rationale for your suggestion.

Comments:

1. Do you have any comments on the SOL Exceedance White Paper? If so, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. The SDT has made revisions to VRFs and VSLs as needed to conform to changes made to requirements. Do you agree with the VRFs and VSLs for the nine posted standards? If you do not agree, please indicate specifically which standard(s) and requirement(s), and whether it is the VRF or VSLs you disagree with, and explain why.

Yes:

No:

Comments:

1. Are there any other concerns with these standards that haven’t been covered in previous questions and comments?

Yes:

No:

Comments: