Unofficial Comment Form

Project 2014-03 Revisions to TOP/IRO Reliability Standards

TOP-001-3

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=8d53c38263e8484ba1c4ea54f3ecb520) to submit comments on the Standard. The electronic comment form must be completed by 8:00 p.m. EST **Monday, November 10, 2014**.

If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

Additional information about this project is available on the [project page](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 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(1).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. In the ballot that ended September 19, 2014, all of the standards except TOP-001-3 achieved greater than the required two thirds ballot pool approval. The SDT has reviewed stakeholder comments submitted in that comment period and made only clarifying and non-substantive changes to all of the standards except TOP-001. No changes were made to the definitions or implementation plan.

The SDT has made numerous changes in the third posting for proposed TOP-001-3 in order to respond to industry comments raised in the second posting.

Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

Commenters are reminded that this is not 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 respond to industry comments to proposed TOP-001-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments: