

Individual or group. (59 Responses)
Name (38 Responses)
Organization (38 Responses)
Group Name (21 Responses)
Lead Contact (21 Responses)
Question 1 (55 Responses)
Question 1 Comments (59 Responses)
Question 2 (52 Responses)
Question 2 Comments (59 Responses)
Question 3 (53 Responses)
Question 3 Comments (59 Responses)
Question 4 (32 Responses)
Question 4 Comments (59 Responses)
Question 5 (0 Responses)
Question 5 Comments (59 Responses)

Group
Northeast Power Coordinating Council
Guy Zito
No
<p>Requirements R1 and R2 should not be separate. Having them broken out in this manner could potentially put entities in double jeopardy when non-compliance occurs. The original language provided for a very narrow limitation on the reasoning and the contact; and they were tied together. This language somewhat allows for the potentially different reasoning being allowed for one's inability to provide notice. If each function needs to be separate, then Requirement R4 should be broken down into two requirements. Requirement R4 states that information is being requested, AND is available. In TOP-001-2 R3 the phrase "known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis" is confusing. The Glossary defines Emergency as any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System. The Glossary defines Operation Planning Analysis as "An analysis of the expected system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.)." What is the difference between TOPs KNOWN to be effected by an anticipated Emergency from those EXPECTED to be effected by an anticipated Emergency? The Requirement should state TOP's expected to affected by an anticipated Emergency. Those TOP's known to be affected are part of the group expected to be affected. Operations Planning occurs in the Day ahead. An actual Emergency does not occur in the Day Ahead. The word actual should be removed. The SDT should scope R3 to the concept of Operational Planning as defined in the Glossary. The Time Horizon in the Requirement is Operations Planning. Suggest rewording Requirement R3 to: R3. Each Transmission Operator shall inform its Reliability Coordinator and those Transmission Operators that are expected to be affected by an anticipated Emergency based on its assessment of its Operational Planning Analysis. Without an expressed time period for the notification in R6, doesn't this create an opportunity for broad interpretations of what is permissible and what's not? It also allows for inconsistent treatment. An auditor's view might be very different from an entity's view. Also, regarding TOP-001-2 R6, which states "Each Balancing Authority and Transmission Operator shall notify the Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetering equipment, control equipment and associated communication channels between the affected entities." This is a big concern. If there is coordination and notification between Reliability Coordinators, but no notification by one of the Reliability Coordinator's to the entities within the affected other Reliability Coordinator's footprint, would that be non-compliant? To ensure proper communications, notifications, and awareness there should only be one Reliability Coordinator communicating to its entities. It is impractical for Balancing Authorities and Transmission Operators to "drill down" and have to notify entities outside of their footprints of the aforementioned planned outages. Regarding</p>

TOP-001, Requirement R8: The drafting team needs to define the term "internal area reliability" in order to improve the clarity of the standard. Double jeopardy is introduced with TOP-001 R8 and FAC-014 R5.2. Fac-014 R5.2 states "The Transmission Operator shall provide any SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area"; while TOP-001 R8 states "Each Transmission Operator shall inform its Reliability Coordinator of each SOL which, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis."

No

The phrasing of the Requirement R1 does not match the rationale box. Based on the Rationale R1, suggest that the requirement should either state the requirement for a process to conduct an Operational Planning Analysis for the next day, or shall conduct an Operational Planning Analysis for the next day. It seems the team could phrase this as a Risk Based Requirement. R1. The Transmission Operator shall CONDUCT an Operational Planning Analysis for the next day's planned operations within its Transmission Operator Area to identify where Facility Ratings or Stability Limits will be exceeded during anticipated normal and Contingency event conditions. Requirement R2 uses a phrase each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1 that implies an SOL exists in the TOP area that was not identified pursuant to FAC-011 R2 and communicated per FAC-014 R5. SOL's that affect a TOP internal area would also affect the RC area. The Drafting Team needs to define the term "internal area reliability" in order to improve the clarity of the standard (see Question 1 comments regarding TOP-001 Requirement R8). Regarding Requirement R3, would notifying GO's of "their roles" in the IROL/SOL mitigation plan provide them market power or represent a violation of Order 888 Firewall?

No

TOP-003 R1 and R2 require data specifications for real-time monitoring. R5 obligates the TO, LSE, and Generator Owners to provide this real-time data. These entities provide a wealth of SCADA data that is utilized in real-time monitoring by TOPs and BAs. It is not clear that a communication error or data quality error for several contiguous time periods or intermittent quality issues would not trigger a violation. This could become an overwhelming compliance issue. TOP-003 R5 has only a severe VSL. Data providers can provide hundreds if not thousands of points to TOPs. If one RTU goes down is the data provider going to be assessed a severe VSL?

TOP-001-2 is referencing a NERC definition for "Reliability Directive" which is not in effect today and is listed on the Definitions of Terms Used in Standard Section on page 2. It is stated that the definition of "Reliability Directive" would be written by the Reliability Coordinator Standards Drafting Team (Project 2006-06), and post it for vetting by the industry sometime in the future. If this standard is approved now and the definition for "Reliability Directive" changes because of the Project 2006-06 work, the TOP standards will have to be revisited. The Project 2006-06 Drafting Team should be coordinating its work with this project to develop an "across the board" usable definition. This Comment Form states under Background Information: o 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." It is not apparent where the 2006-06 team added "Adverse Reliability Impacts" to the definition. This change also impacts compliance to COM-002.

Individual

Jonathan Appelbaum

United Illuminating Company

No

R3 phrase "known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis" is confusing. Glossary defines emergency as Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System. Glossary defines Operation Planning analysis as An analysis of the expected

system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). I do not see the difference between TOPs KNOWN to be effected by an anticipated Emergency from those EXPECTED to be effected by an anticipated Emergency. The Requirement should state TOP's expected to effected by an anticipated Emergency. Those TOP's known to be effected are part of the group expected to be effected. Operations Planning occurs in the Day ahead. An actual Emergency cannot occur in the Day Ahead. The word actual should be removed. The SDT should scope R3 to the concept of Operational Planning as defined in the Glossary. Along the thought the Time Horizon in the Requirement is Operations Planning. I suggest rephrasing this requirement as: R3. Each Transmission Operator shall inform its Reliability Coordinator and those Transmission Operators that are expected to be affected by an anticipated Emergency based on its assessment of its Operational Planning Analysis. Comment for R8. It seems that double jeopardy is introduced with TOP-001 R8 and FAC-011 R5.2. Fac-011 R 5.2 states The Transmission Operator shall provide any SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area; while TOP-001 R8 states R8. Each Transmission Operator shall inform its Reliability Coordinator of each SOL which, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis.

No

The phrasing of the Requirement R1 does not match the rationale box. Based on the Rationale R1, UI suggests the requirement should either state the requirement for a process to conduct an Operational planning Analysis for the next day, or shall conduct an Operational Planning Analysis for the next day. It seems the team could phrase this as a Risk Based Requirement. R1. The Transmission operator shall CONDUCT an Operational Planning Analysis for the next day's planned operations within its Transmission Operator Area to identify where Facility Ratings or Stability Limits will be exceeded during anticipated normal and Contingency event conditions. R2: uses a phrase each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1 that implies an SOL exists in the TOP area that was not identified pursuant to FAC-011 R2 and communicated per FAC-011 R5. SOL's that affect a TOP internal area would also affect the RC area.

No

TOP-003 R1 and R2 require data specifications for real-time monitoring. R5 obligates TO, LSE, and Generator Owners to provide this real-time data. These entities provide a multitude of SCADA data that is utilized in real-time monitoring by TOPs and BAs. It is not clear to UI that a communication error or data quality error for several contiguous time periods or intermittent quality issues would not trigger a violation. This could become an overwhelming compliance issue.

No

TOP-003 R5 has only a severe VSL. This seems unequitable to the data providers who are responsible for tens of thousands of data points, some redundant. Especially since State Estimators are designed to estimate for bad or missing data.

Individual

Jonathan Appelbaum

United Illuminating

No

R3 phrase "known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis" is confusing. Glossary defines emergency as Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System. Glossary defines Operation Planning analysis as An analysis of the expected system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). I do not see the difference between TOPs KNOWN to be

effected by an anticipated Emergency from those EXPECTED to be effected by an anticipated Emergency. The Requirement should state TOP's expected to effected by an anticipated Emergency. Those TOP's known to be effected are part of the group expected to be effected. Operations Planning occurs in the Day ahead. An actual Emergency cannot occur in the Day Ahead. The word actual should be removed. The SDT should scope R3 to the concept of Operational Planning as defined in the Glossary. Along the thought the Time Horizon in the Requirement is Operations Planning. I suggest rephrasing this requirement as: R3. Each Transmission Operator shall inform its Reliability Coordinator and those Transmission Operators that are expected to be affected by an anticipated Emergency based on its assessment of its Operational Planning Analysis. Comment for R8. It seems that double jeopardy is introduced with TOP-001 R8 and FAC-011 R5.2. Fac-011 R 5.2 states The Transmission Operator shall provide any SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area; while TOP-001 R8 states R8. Each Transmission Operator shall inform its Reliability Coordinator of each SOL which, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis.

No

The phrasing of the Requirement R1 does not match the rationale box. Based on the Rationale R1, UI suggests the requirement should either state the requirement for a process to conduct an Operational planning Analysis for the next day, or shall conduct an Operational Planning Analysis for the next day. It seems the team could phrase this as a Risk Based Requirement. R1. The Transmission operator shall CONDUCT an Operational Planning Analysis for the next day's planned operations within its Transmission Operator Area to identify where Facility Ratings or Stability Limits will be exceeded during anticipated normal and Contingency event conditions. R2: uses a phrase each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1 that implies an SOL exists in the TOP area that was not identified pursuant to FAC-011 R2 and communicated per FAC-011 R5. SOL's that affect a TOP internal area would also affect the RC area.

No

TOP-003 R1 and R2 require data specifications for real-time monitoring. R5 obligates TO, LSE, and Generator Owners to provide this real-time data. These entities provide a multitude of SCADA data that is utilized in real-time monitoring by TOPs and BAs. It is not clear to UI that a communication error or data quality error for several contiguous time periods or intermittent quality issues would not trigger a violation. This could become an overwhelming compliance issue.

No

TOP-003 R5 VSL is only severe. Data providers can provide hundreds if not Thousands of points to TOPs. If one RTU goes down is the data provider going to be assessed a severe VSL.

Individual

Rich Vine

California Independent System Operator

No

R6 requires Balancing Authorities and Transmission Operators to notify "negatively impacted interconnected NERC registered entities" of planned outages. This term is not specific enough to narrow down who must be notified. For instance, with this open-ended wording it could be construed that BAs would have to notify LSEs and DPs in their areas which would be an onerous task. We would recommend staying with "negatively-affected BAs and TOPs." The wording in R9 is confusing and is not specific enough to ensure compliance. In particular the requirement prohibits operation outside any SOL "for a continuous duration that would cause a violation of the Facility Rating or Stability criteria upon which it is based." However, by NERC definition an SOL is based upon Facility Rating and Stability Criteria, so operating outside the SOL is always going to violate the Facility Rating. In addition, under R9 and M9, how will the word "continuous" be defined or measured? This is extremely important to understand because the VSL table states the following as Severe for R9: "The Transmission Operator exceeded a System Operating Limit (SOL) as identified in Requirement R8 for a continuous duration greater than 30 minutes that would cause a violation of the Facility Rating or Stability criteria." It seems that the effective date should be set much sooner than 24 months

following approval since there are basically no new requirements associated with this standard. Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well.

Yes

The ISO supports the changes made in TOP-002-3 but notes that the "Seasonal Assessment" previously required by TOP-002-2 is no longer addressed in the TOP-002-3 wording. Is this an oversight or is this seasonal assessment going to be contained elsewhere?

Yes

The words "and Operational Planning Analyses" should be added to the end of the first sentence in R2 (the Operational Planning Analysis is included in R1). A similar addition should be made to R4.

Individual

Thomas E Washburn

FMPP

Yes

Yes

Yes

Yes

Comments for Project 2007-03 Real-Time Transmission Operations The changes to the TOP Standards are a great improvement over the existing Standards; however, I think because they are so much better than the existing Standards that they should be implemented as soon as possible. I think one year is enough time to make the necessary changes to processes, procedures and documentation. Even more important than the implementation of the new Standards is the deletion of the existing Standards as soon as possible. Some of the existing Requirements are worthless and unenforceable. The SDT has determined that some of the existing Requirements are replaced by new requirements and they will need to be enforceable until the new Requirements are enforceable. However, the SDT has identified some Requirements that are either no longer necessary or covered by existing Requirements or the Functional Model (see mapping document excerpts below): • PER-001-0 R1 • TOP-001-1 R1 • TOP-002-2 R2 • TOP-002-2 R7 • TOP-002-2 R8 • TOP-002-2 R18 • TOP-002-2 R19 Deleting these Requirements does not need to have an implementation period. They can be deleted as soon as approved by FERC with no waiting. TOP-002-2 R8 is the most important Requirement to be deleted as soon as approved because it never should have been a requirement of the Balancing Authority. To make matters worse this Requirement is in the tier 2 Requirements for actively monitored Requirements for 2012! Also the SDT has identified some Requirements that apply to the Balancing Authority that are either no longer necessary (or even NEVER should have been applicable) or covered by existing Requirements or the Functional Model (see mapping document excerpts below): • TOP-002-2 R1 • TOP-002-2 R5 • TOP-002-2 R6 • TOP-002-2 R10 The SDT states for TOP-002-2 R10: "The Balancing Authority is only responsible to respond to Reliability Directives as per the definition of Balancing Authority in the NERC Glossary and, thus, this requirement should never have been applicable to the Balancing Authority." Obvious wrong Requirements like TOP-002-2 R10 should be deleted ASAP. They are a compliance conundrum, and open to compliance fines! From the Mapping Document: PER-001-0 R1 is deleted because "In FERC Order 693a, paragraph 112, the Commission clarifies that a Reliability Coordinator's authority to issue directives arises out of the Commission's approval of Reliability Standards that mandate compliance with such directives. The SDT reasonably applied this same logic to Transmission Operators and Balancing Authorities and that makes this requirement superfluous and thus it can be deleted." TOP-001-1 R1 is deleted because "This is a generic requirement that is no longer necessary since there are now specific requirements that cover all needed reliability actions. Deletion of this requirement doesn't alleviate responsibility for actions as each individual requirement in the Reliability Standards now specifies an action and a responsible

entity. These needed actions required for reliability of the bulk power system have been more clearly laid out in revised standards. (See FERC Order 693a, paragraph 112.) The requirement is also non-specific, ambiguous, and not performance oriented. If an entity doesn't perform as specified in an individual requirement, then they are held accountable at that level. All of this makes this requirement redundant. The overall reliability of the bulk power system is not adversely affected by the deletion of this requirement." TOP-002-2 R1 is deleted for the Balancing Authority because "The Balancing Authority is required to balance by approved BAL-001-0.1a and approved BAL-002-1 and must take action per approved EOP-002-2.1, Requirement R6 and thus the Balancing Authority part of this sentence can be deleted. Second sentence – Deleted as superfluous. Use of appropriate personnel and equipment is incumbent to responsible entities as per their certification as NERC registered entities. " TOP-002-2 R2 is deleted because "The SDT reviewed the purpose of the Reliability Standard and believes that this requirement referred to operations planning. Given the current definition of Transmission Operator in the Glossary and Functional Model v5, operations planning is part of what the Transmission Operator is required to do and as such this requirement is no longer needed and can be deleted. " TOP-002-2 R5 is deleted for the Balancing Authority because "The part of the requirement dealing with the Balancing Authority is replaced by approved BAL-001-0.1a. The Functional Model requires a Balancing Authority to operate under the direction of the Transmission Operator for such matters. It is also a basic tenet of operations and good standards that only one entity should be 'in charge'. The Balancing Authority can only work within the constraints handed down by the Transmission Operator. Any needed coordination issues are built in to the Functional Model." TOP-002-2 R6 is deleted for the Balancing Authority because "The part of this requirement dealing with the Balancing Authority is replaced by approved BAL-002- 0 and proposed BAL-002-1, Requirements R2 through R4 and approved EOP-002-2.1 and the proposed EOP-002-3, Requirement R6. The Functional Model requires a Balancing Authority to operate under the direction of the Transmission Operator for such matters. It is also a basic tenet of operations and good standards that only one entity should be 'in charge'. The Balancing Authority can only work within the constraints handed down by the Transmission Operator. Any needed coordination issues are built in to the Functional Model. " TOP-002-2 R7 is deleted because "The Balancing Authority is required to always plan to meet and recover from Contingency events as stated in approved BAL-002-1, Requirement R2 and therefore this requirement is redundant and can be deleted as all elements of the requirement are now covered in other standards. Deliverability is not in the control of the Balancing Authority!" TOP-002-2 R8 is deleted because "The Balancing Authority must be told by the Transmission Operator to take actions regarding reactive power (see proposed TOP-001-2, Requirement R1) and, thus, this requirement can be deleted as all elements of the requirement are now covered in other standards. Voltage and reactive power balance are the responsibility of the Transmission Operator (not the Balancing Authority) and are replaced by approved VAR-001-1, Requirement R1. Deliverability is not in the control of the Balancing Authority!!" TOP-002-2 R8 is the most important Requirement to be deleted as soon as approved because it should never have been a requirement of the Balancing Authority. To make matters worse this Requirement is in the tier 2 Requirements for actively monitored Requirements for 2012! TOP-002-2 R10 is deleted for the Balancing Authority because "The Balancing Authority is only responsible to respond to Reliability Directives as per the definition of Balancing Authority in the NERC Glossary and, thus, this requirement should never have been applicable to the Balancing Authority." TOP-002-2 R18 is deleted because "This requirement adds no reliability benefit. Entities have existing processes that handle this issue. There has never been a documented case of the lack of uniform line identifiers contributing to a system reliability issue. " To make matters worse this Requirement is the tier 1 Requirements for actively monitored Requirements for 2012! Which means NERC views this as an important Requirement to reliability. But I agree with the SDT that this Requirement adds NO reliability benefit. TOP-002-2 R19 is deleted because "This is part of an entity's certification and is no longer required in standards. "

Individual

Scott Bos

Muscatine Power and Water

No

Issue: Please clarify on the issue of SOLs. IROLs have a time limit but SOLs do not. Is the SDT requiring no SOL limit(s) are to be violated? What is the criteria and basis to R8 and R9. Note that the SOL definition has a thermal rating component in it and we are not sure how you can't draw SOLs into the same category as IROLs unless you clearly indicate these standards only apply to a subset.

No
Issue: The SDT uses a non FERC approved term of "Operational Planning Analysis", This term is in the NERC Glossary of terms. Recommend that this statement be forwarded with this Standard to FERC for approval.
No
Issue: There is a great possibility of double jeopardy when R3 and R4 have in part the statement of "...in meeting its NERC-mandatory reliability requirements." So, an Entity could be found non compliant with R1 or R2 and also not fulfill R3 or R4. Or if an entity was found non-compliant with any of the unknown "...in meeting its NERC-mandatory reliability requirements" then they would be found non-compliant with this Standard. It is not clear why this Standard is being written with the statement of: "...in meeting its NERC-mandatory reliability requirements."
Yes
Group
PacifiCorp
Sandra Shaffer
Yes
Yes
Yes
No comment.
PacifiCorp would like to express their appreciation to the SDT for their efforts. This consolidation effort has resulted in a more streamlined approach to this set of interrelated NERC Reliability Standards. PacifiCorp would recommend that NERC consider other sets of standards for which such a consolidation effort would be mutually beneficial to NERC and stakeholders, from both a compliance and administrative standpoint.
Individual
Howard Rulf
We Energies
No
R3's wording is incomplete. It requires informing and states who must be informed but does not state what must be told. The bulk of the requirement is a description of which RCs and TOPs must be informed, but lacks informing the TOP's BA(s) of an Emergency. Should also include the BA informing its RC and TOP(s) R4 It is not clear what emergency assistance a TOP can provide? Most actions would involve moving a generator or shedding load, the few items a TOP can do independently like returning a line from outage, or switching reactive devices should be done as a matter of course. R5 The bulk of the requirement is a description of which RCs and TOPs must be informed, but lacks informing the TOP's BA(s) of an operation resulting in an Adverse Reliability Impact. Should also include the BA informing it's RC and TOP(s) R6 is overly broad. Every entity in an interconnect can be negatively impacted somehow. The requirement should be focused on the operational entities of the TOP, BA and RC. These are the entities that specify the data that must be made available see IRO-010, proposed TOP-003 from others. Individual asset owners provide data to the operators and when the operators plan an outage they should let the other affected TOP, BA and RC know its to happen. R8: change "have" to "has". The associated measures should be updated to reflect the above. Data Retention: The second paragraph states that Measures must be complied with. Compliance with measures cannot be required.
No
How current should the Operational Planning Analysis be? By definition it can be 12 months ahead. Data Retention: The second paragraph states that Measures must be complied with. Compliance with measures cannot be required.

No
R1.4 and R2.4: The deadline must allow time to gather and send the data. If the TOP said immediately, you would be immediately non-compliant. In addition, R2 should include data necessary to perform at least Next Day analysis, even Operational planning Analysis. R5 needs to include the DP. Data Retention: Each bullet states that monitoring is required in accordance with Measures. Measures cannot be requirements.
Group
Southwest Power Pool Regional Entity
Emily Pennel
No
Action is only required by the proposed standards if a real time violation of a previously identified SOL occurs. No action is required in a preventative manner and no action is required as a result of a real time problem that was not identified by the Operational Planning Assessment. R5 should include notifying the RC of anticipated SOL violations. Addition in quotes. Each Transmission Operator shall inform its Reliability Coordinator and other Transmission Operators of its operations known or expected to result in an Adverse Reliability Impact "or SOL violation" on those respective Transmission Operator Areas unless conditions do not permit such communications. Such operations may include relay or equipment failures and changes in generation, Transmission, or Load.
No
See item number 5 for comments.
Yes
Yes
The standards being proposed are not sufficient to replace the requirements of the 9 standards being retired by this project. The requirements listed below are not covered by the new standards. TOP-001-1 R5. New requirement (TOP-001-2 R11) does not cover "take actions to avoid when possible or mitigate the emergency." Pre-emptive action is an important part of preventing cascading outages. The proposed TOP-001-2 R11 only deals with real time violations. The SDT is relying upon IRO-001-3 being approved in order to retire some of these requirements; however, this has not yet been passed by industry. TOP-002-2 R1. If conditions change on the current day, where in the proposed standards is a new operating plan required to prepare for the next contingency or identify new SOLs? R6. Which of the proposed standards obligate the TOP to continuously plan for the next N-1 event? R13. MOD-024 and MOD-025 (which would replace this requirement) were not approved by FERC in the initial set of standards. A replacement standard MOD-025-2 has been posted for comment, but has not had an initial ballot. TOP-004-2 R1. The proposed TOP-001-2, R7 and R9, only requires IROs and certain SOLs be respected. The requirement being retired applied to all SOLs. This reduces BES reliability. R4. This covers cases where no Operational Planning Assessment is available to ensure the system is in a safe state. The proposed TOP-002-3 does not include any requirement about when a new study is needed. TOP-006-2 R5., R6., R7. The SDT is relying on the certification process to justify the retirement of these requirements. However, the Certification Process only looks at approved applicable Reliability Standards. If these are retired, these will no longer be reviewed by the Certification Team. TOP-008-1 R2. The current language in TOP-008-1, R2 of "shall operate to prevent the likelihood that a disturbance will result in an IROL violation" is different than the proposed language of TOP-001-2, R7 and R9 "shall not operate outside the IROL (or SOL)". We recommend incorporating the "shall operate to prevent the likelihood that a disturbance will result in an IROL violation" into TOP-001-2 R7. PER-001-0 R1. The existing requirement specifically places the responsibility on the personnel on shift not on the senior management. This does not appear to be covered by any other requirement. PRC-001-1 R2. The obligation to take corrective actions for protection relay or equipment failures is not covered by the proposed TOP-003-2 standard.
Group
NIPSCO

Joe O'Brien
Yes
In R8 consider changing "internal area" to "Transmission Operator Area" In R9 consider clarifying "continuous duration", what is that?
Yes
None at this time
Yes
In R3 & R4 the phrase "in meeting its NERC-mandated reliability requirements" is too open-ended and may be difficult to comply with. This should be more specific; what requirements are these.
Yes
None at this time
None at this time,
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
No
<ul style="list-style-type: none"> • If the definition of "Reliability Directive" remains, the Definitions of Terms Used in the Standard should note that there is in fact a new or revised definition. ATC agrees with the definition. • Requirement 4 – This should have a control by the Reliability Coordinator to ensure that a Transmission Operator in distress has, in fact, implemented their "comparable emergency procedures". • Requirement 5 - ATC does not agree with removing the BA from this requirement since they make note that it will be addressed in another, "proposed" requirement as stated in the mapping document. • Requirement 7 - Real-Time EMS representation of IROL Tv, will require an unidentifiable amount of resources. • Requirement 9 - SOL's should have a time requirement. Also, they should not be raised to the level of IROL's as may be insinuated by this requirement if they are discretionary, as noted in Requirement 8. • Requirement 11 - If this requirement entails the issuing of a "Reliability Directive", it should be stated as such.
No
Requirement 1 - Granted, if the rationale does not mandate "how" an analysis is completed, a better requirement of the "what" should be stated. If this analysis base-case, N-1, is unilateral by the TOP, without iteration with the BA, then should the process be documented?
No
In the introduction to this question, the Standard number should be corrected to TOP-003-2. Requirement 1- A data specification must have bounds. There is nothing that would preclude a request for data that is not achievable yet is mandated to be satisfied by Requirement 5. Requirement 1, sub-Requirement 1.2 may never be arrived at given the former.
None
ATC feels this project has diminished a good base of existing standards, and introduced ambiguity, and vagueness. Additionally, we feel certain key aspects of the current standards were removed for example, "Clear, decision making authority" from System Operators, and the need for "Uniform Line Identifiers", which is not in the interest of Reliability.
Individual
Jeff Longshore
Luminant Energy Company, LLC
Yes
Yes
No
TOP-003-2 as currently written does not provide any recourse for the entity receiving a data request if that entity feels the data request is unreasonable either in content or timing or if the entity does not have the data available to submit. As such I would recommend modify R5 as follows: R5. Each.....shall

satisfy the obligations of the documented specification for data. R5.1. If the entity receiving the data request cannot provide the requested data either in content or timing then the entity receiving the data request shall notify the requesting entity and provide a reason for not providing the data.

No

The VSL for TOP-003-2 R5 places a more stringent severity level on the entities receiving the data requests than it places on the entities that are responsible for creating the data requests. As such, I would suggest changing the VSL for TOP-003-2 R5 to the following: Lower: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy one of the obligations of the documented specification for data. Moderate: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy two of the obligations of the documented specification for data. High: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy three of the obligations of the documented specification for data . Severe: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy four or more of the obligations of the documented specifications for data.

Group

Lincoln Electric System (LES)

Eric Ruskamp

No

R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included a provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? R8 is unclear as currently drafted. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? With the inclusion of internal area reliability in R8 and R9, aren't these requirements now in conflict with the purpose of the standard which is directed toward impacts on the reliability of the interconnection? Including IROs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation.

Yes

No

Please refer to comments submitted by MRO's NERC Standards Review Forum for LES' concerns related to TOP-003.

No

The word "affected" should be added to the Moderate VSL for TOP-001-2 R3 following "...known or expected to be affected by an actual...".

Group

Progress Energy

Jim Eckelkamp

No

Progress, while supporting what we believe is the overall intent of this Standard revision, cannot support an affirmative vote on TOP-001-2. Progress appreciates the efforts of the SDT and offers the following suggestions: In R8 it remains unclear what is meant by the phrase "supporting its internal area reliability." Clarity and unambiguous language is needed here so that entities can clearly understand and comply with the requirement. Progress understands from reading the most current

"Consideration of Comments" that the Standard Drafting Team left this phrase intentionally undefined; however, the inclusion of this phrase means that in an audit scenario there could be a disagreement about what "supporting its internal area reliability" means. This has the potential to negatively impact the compliance position of the Transmission Operator. In R9 it is unclear what is meant by a "continuous duration that would cause a violation..." Some entities may have facility ratings that are time based, while other entities take the position that the exceedance of a facility rating for any amount of time means an SOL violation. A suggested change in wording would be to simplify the requirement to read "Each Transmission Operator shall not operate outside any SOL identified in Requirement R8 that would cause a violation of the Facility Rating or Stability criteria upon which it is based." Progress suggests changing R10 to read "Each Transmission Operator shall inform its Reliability Coordinator of the mitigation actions it has taken or directed to return the system to within limits when an IROL, or each SOL identified in Requirement R8, has been exceeded." The current draft language implies that the TOP must only inform the RC of "...its actions..." Progress suggests switching the order of the current R10 and R11; from reading the most current "Consideration of Comments" it seems that the actions required in R8-R11 are intended to be sequential. Progress suggests that switching the order of the current R10 and R11 would make it easier for a reader to understand that these are intended to be sequential actions.

Yes

A definition of "internal area reliability" is needed

Yes

Please include "operational Planning Analyses" in R2 as you have in R1.

Group

Bonneville Power Administration

Annie Lauterbach

No

Comments: Given the potential uncertainty regarding the 30 Minute Rule, BPA suggests adding more clarity to the standard TOP-001-2 as the new draft could be interpreted to mean that one would need to get the flows below the SOL immediately. BPA believes this is not practical because it takes a definite amount of time to change schedules, move generation, or perform other actions in order to reduce loadings on facilities. BPA believes the new draft should include guidance as to how much time the BA or Transmission Operator would be allowed in order to reduce flows when there is an SOL violation. BPA suggests that more clarity be provided and/or the 30 minute rule be added back to the standard.

No

Given the potential uncertainty regarding how many day ahead studies may be required, BPA suggests adding more clarity to the standard TOP-002-3. BPA recognizes that various regions experience peak operations at different times of the day, anticipated generation patterns shift over the course of the day, and transmission facilities come in and out of service for planned work at various times throughout the day. Hence, due to these multiple shifts in forecast system conditions, it is unclear whether more than one study is required to meet the requirements of this standard.

Yes

BPA is in support of standard TOP-003-1, due to the importance of being able to receive data.

Individual

DAVID DOCKERY

Associated Electric Cooperative, Inc.

Yes

R3 Guidance Add: A Guidance Section for Requirement R3 clarifying "anticipated Emergency" - AECI believes the SDT should draft guidelines as to what "anticipated Emergency" means within this requirement. That guidance should also caution against dumping information (data-overload) upon

neighboring parties, for trivial impacts to their system. Rationale: In earnest to avoid non-compliance with R3, entities could blast their neighbors with all changes, regardless of impact, and then the purpose of this requirement will be lost.) R6 Requirement wording Change: "negatively impacted" To: "known negatively impacted" Rationale: While 1st hand affected parties are likely known, secondarily affected parties might pose a compliance problem. R8 Guidance Add: An R8 Guidance section Rationale: AECI's understanding is that our providing our RC with AECI's most-limited-element equipment seasonal operating limits and short-term limits, where applicable, meets this requirement. If we are wrong, then additional guidance is definitely necessary.

Yes

R1 Rationale Change: Rework or remove entirely Rationale: The R1 Rationale section does not match the R1 requirement as currently worded, and frankly is impossible, within the timing constraints of next-day analysis. (Example: PSS/E is technically a tool for steady-state network analysis. Without that tool, or a similar network-analysis tool being available, such analysis would be impossible by hand.) R3 Requirement wording Change: "in the plan(s)" To: "in the N-1 contingency-related plan(s)" Then Append: ", N-2 related contingency-plan(s) should be omitted unless highly plausible." Rationale: This recommended change seeks to avoid information overload on neighbors, while still encouraging more in-depth near-term contingency planning.

Yes

TOP-003-1 R1, R2, and R3 Guidelines Add: Guidelines Section - These requirements are all written as highly TOP-centric and BA-centric, without regard to the confusion and work-load a single published plan could cause small entities. If hundreds or perhaps thousands of data-points are cited within a uniformly circulated plan, yet some entities provide only one or two obscure points within that plan, then the TOP or BA is being unnecessarily inconsiderate, and should have appropriately filtered that request for their audience. Rationale: Very large TOPs or BAs would benefit from being reminded that they need to consider their audience when sending out plans as data-requests to small entities. There is no need to overwhelm smaller entities with a lot of unrelated data, or data that does not seem to match their own identifiers. We can do better.

No

TOP-001-2-R1 VSL Change: "unless such action would violate" To: "and such action would have violated" Rationale: State the issue rather than recite the requirement. TOP-001-2-R8 VSL Change: "whichever is less" To: "whichever is greater" Rationale: Intent TOP-001-2-R10 VSL Change: "has been" To: "had been" Rationale: grammatical TOP-002-3-R1 Lower VSL: Duplicate Severe VSL wording then append ", on one day within a calendar year." TOP-002-3-R1 Moderate VSL: Duplicate Severe VSL wording then append ", on two non-consecutive days within a calendar year." TOP-002-3-R1 High VSL: Duplicate Severe VSL wording then append ", on three non-consecutive days or two consecutive days within a calendar year" TOP-002-3-R1 Severe VSL: Append: ", on four or more days, or three consecutive days within a calendar year." TOP-002-3-R1 VSL changes Rationale: Eliminate zero-defect expectation TOP-002-3-R3 VSL Change: "of the NERC" To: ", whichever is greater, of the NERC" Rationale: precision and alignment with wording in TOP-01-2 R8 VSLs.

Group

ISO/RTO Standards Review Committee

Albert DiCaprio

No

Instead of using 'its' TOP in R1 we suggest using 'a' TOP since it is possible for the listed entities to have multiple TOPs. R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? This brings us to the issue of R8. R8 is unclear. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? With the inclusion of internal area reliability in R8 and R9, aren't these requirements now in conflict with the purpose of the standard which is directed toward impacts on the

reliability of the interconnection? Including IROLs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROLs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROLs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well.

No

Even though the SDT directs us to the SOL methodology in the FAC standards which specify N-1 contingencies, R1 is not as clear in specifying N-1 contingencies as the old R6 was. We would prefer to maintain that clarity. Requiring the TOP to develop a plan to operate within each IROL in R1 is too broad. To narrow the scope of this requirement we suggest inserting the phrase 'within its TOP Area or for which it has been notified by another TOP under R3' in R1 immediately following (IROL).

Yes

No

TOP-001-2, R3 Moderate VSL – the word "affected" has been omitted and needs to be inserted. TOP-003-2, R1 & R2 – The use of the term 'element' in the VSLs for these requirements is confusing. What is an element? Is it restricted to the four items listed under R1 and R2 or could it be multiple items from R1.1 and R2.1 or some combination there of? TOP-003-2, R5 – The single VSL for this requirement is all or none. If a single data point is missing, the violation is Severe. Couldn't this requirement have feathered VSLs such that the more data points missing the more severe the violation would become?

The definition of Reliability Directive is contained in COM-002-3 and that standard hasn't been posted for comment/ballot at this time. What happens if the TOP standards are approved and the COM-002-3 standard is subsequently not approved?

Individual

Michael Falvo

Independent Electricity System Operator

Yes

Yes

We assess that the industry's comment on R3 regarding the need to inform all NERC registered entities identified in the plan(s) was due to the absence of a requirement to identify these entities. We therefore suggest to revise Requirement R2 to drive home the need to identify registered entities that are included in the plan(s) to operate to within IROL and SOL, and set the stage for R3: Each Transmission Operator shall develop a plan, and identify the entities that will be required to implement actions, to operate within each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1.

Yes

We agree with the addition of R2, but have a concern over Measure M2, which says: M2: Each Balancing Authority shall make available its dated, current, in force documented specification for data in accordance with Requirement R2. The wording "dated, current, in force" does not reflect what's in the requirement R2, and is not necessary. This wording pertains to the data retention requirement, which is already included in the second bullet in Section D, 1.3 – Data Retention: "Each Balancing Authority shall retain their dated, current, in force, documented specification for the data necessary for them to perform their required Real-time monitoring in accordance with Requirement R2 and Measurement M2 as well as any documents in force since the last compliance audit." We suggest to remove this wording from M2.

Yes

Group
FirstEnergy
Sam Ciccone
Yes
Yes
Yes
Yes
FE has the following comments and suggestions: 1. In the mapping document, it shows that PRC-001-1 R2 will be replaced by the new TOP-003-2 R5. However, we do not see a new version of PRC-001-2 posted. Also, the implementation plan makes no reference to PRC-001. 2. The mapping document does not seem to be referencing the correct version of TOP-005 (should be Version 2a). Also, the mapping document is not referencing the correct requirement for TOP-006-1 R4 (the RC should not be shown as applicable).
Individual
Robert Roddy
Dairyland Power Cooperative
Yes
Concern re R5. The determination of when an operating condition could be "expected to result in an Adverse Reliability Impact" would be difficult and ambiguous.
Yes
No
R1 and R2 refer to "A periodicity for providing data" and "The deadline by which the respondent is to provide the indicated data". What if this specification is unreasonable? To address this concern, DPC suggests adding the words "mutually agreeable" as was used in reference to the format specification.
Yes
Group
Imperial Irrigation District (IID)
Jesus Sammy Alcaraz
No
R2 - This requirement requires the BA, GOP, and LSE to notify the TOP if it cannot comply with the Reliability Directive. (Comment) – Should include the language that the entity is not able to comply with the Reliability Directive due to violation of safety, equipment regulatory or statutory requirements. R7 – This requirement requires that the TOP not operate outside any identified Interconnection Reliability Operating Limit (IROL) for a continuous duration exceeding its associated IROL (Comment) – Should the language in the requirement also include the reference to SOLs since WECC does not have IROLs? R8 – This requirement requires the TOP to inform its Reliability Coordinator of each SOL which, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis (Comment) – Remove “which, while not IROL” from the requirement language and add “that” before “have been identified”. This would make the statement more clear. R9 – This requirement requires that the TOP not operate outside any System Operating Limit (SOL) identified in Requirement R8 for a continuous duration that would cause a violation of the Facility Rating or Stability criteria upon which it is based. (Comment) – Define Continuous. What would constitute a violation? 5 minutes, 10 minutes? In some cases corrective action requires participation and/or direction from the Reliability Coordinator and this could take up to 30 minutes. Recommend leaving the 30 minute duration in

place. (Comment) – Recommend referencing R7 if the SOLs are included in the requirement. R10 – This requirement requires the TOP to inform its Reliability Coordinator of its actions to return the system to within limits when an IROL, or each SOL identified in Requirement R8, has been exceeded. (Comment) – the language should include the reference to R7 if the SOL is included in the requirement. (Comment) – Recommend including time frame for notification to the Reliability Coordinator to include “30 minutes or less” R11 – This requirement requires the TOP to act or direct others to act, to mitigate both the magnitude and duration of exceeding an IROL within the IROL’s Measures or of an SOL identified in Requirement R8. (Comment) – Since only the Reliability Coordinator has the authority to direct others to take action; should the language be revised in the following manner; “The TOP shall take action to mitigate both the magnitude and duration of exceeding an IROL or an SOL as identified in R7 and R8 that occur within its TOPs area. The TOP shall appeal to the Reliability Coordinator to direct other TOPs in mitigating both magnitude and duration on interconnected facilities on the Bulk electric System”.

No

R1 – This requirement requires the Transmission Operator to have an Operational Planning Analysis that represents projected System conditions that will allow it to assess whether the planned operations for the next day within its Transmission Operator Area will exceed any of its Facility Ratings or Stability Limits during anticipated normal and Contingency event conditions (Comment) - Recommendation that the requirement language be changed to “Each TOP shall perform the required Operational Planning Analysis for Next-Day Operations to assess if the Next-Day Operations Plan will exceed any of its Facility and/or stability limits under normal or emergency conditions”. R2 – This requirement requires the Transmission Operator to develop a plan to operate within each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1 (Comment) Recommend that the language be revised for clarity to state the following; “The TOP shall develop a plan to operate within established IROL and SOLs according to the Operation Planning Analysis performed for its Next-Day Operation in Requirement 1. R3 – This requirement requires the TOP to notify all NERC registered entities identified in the plan(s) cited in Requirement R2 as to their role in those plan(s) (Comment) – Recommend revising the language in the requirement to state the following; “The TOP shall notify all affected NERC Registered entities of possible impacts identified in its Operational Planning Analysis for its Next-Day Operations in Requirement 1. M2 – The measurement requires the TOP to have evidence that it has developed a plan to operate within each IROL and each SOL which, while not an IROL has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1 in accordance with Requirement (Comment) – Revise the Measurement to state the following; “The TOP shall have evidence that it developed a plan to operate within established IROL or SOLs supporting its internal reliability area as a result of its Operational Planning Analysis performed”. M3 – Each Transmission Operator shall have evidence that it notified all NERC registered entities identified in the plan(s) cited in Requirement R2 as to their role in the plan(s) in accordance with Requirement R3. Such evidence could include but is not limited to dated operator logs, voice recordings, or e-mail records. (Comment) – Revise the measurement to state the following; “The TOP shall provide evidence that it notified affected NERC Registered Entities as being impacted in the Operational Planning Analysis related to its Next-Day plan. Such evidence shall include but not be limited to dated E-Mails, Operator Logs, or Voice Recordings. Data Retention – Each Transmission Operator shall keep data or evidence to show compliance for each Requirement and Measure for a rolling six month period for analyses, the most recent three months for voice recordings, and 12 months for operating logs and e-mail records unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation. If a Transmission Operator is found non-compliant, it shall keep information related to the non-compliance until found compliant or the time period specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records. (Comment): The time frames appear to be pretty specific for the data retention. However when will the entity know that it has to save the evidence farther back than the set time frame. Would it not be better to have the Data Retention language require the entity to save all evidence back 12 months and to save any evidence related to a system disturbance/event?

Yes

Yes
None
Individual
Kathleen Goodman
ISO New England Inc.
No
<p>Instead of using 'its' TOP in R1 we suggest using 'a' TOP since it is possible for the listed entities to have multiple TOPs. R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? This brings us to the issue of R8. R8 is unclear. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? With the inclusion of internal area reliability in R8 and R9, aren't these requirements now in conflict with the purpose of the standard which is directed toward impacts on the reliability of the interconnection? Including IROLs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROLs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROLs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well.</p>
No
<p>Even though the SDT directs us to the SOL methodology in the FAC standards which specify N-1 contingencies, R1 is not as clear in specifying N-1 contingencies as the old R6 was. We would prefer to maintain that clarity. Requiring the TOP to develop a plan to operate within each IROL in R1 is too broad. To narrow the scope of this requirement we suggest inserting the phrase 'within its TOP Area or for which it has been notified by another TOP under R3' in R1 immediately following (IROL).</p>
Yes
<p>The definition of Reliability Directive is contained in COM-002-3 and that standard hasn't been posted for comment/ballot at this time. What happens if the TOP standards are approved and the COM-002-3 standard is subsequently not approved?</p>
Group
Southwest Power Pool Reliability Standards Development Team
Jonathan Hayes
No
<p>Instead of using 'its' TOP in R1 we suggest using 'a' TOP since it is possible for the listed entities to have multiple TOPs. R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? This brings us to the issue of R8. R8 is unclear. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? With the inclusion of internal area reliability in R8 and R9, aren't these</p>

requirements now in conflict with the purpose of the standard which is directed toward impacts on the reliability of the interconnection? Including IROLs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROLs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROLs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well.

No

Even though the SDT directs us to the SOL methodology in the FAC standards which specify N-1 contingencies, R1 is not as clear in specifying N-1 contingencies as the old R6 was. We would prefer to maintain that clarity. Requiring the TOP to develop a plan to operate within each IROL in R1 is too broad. To narrow the scope of this requirement we suggest inserting the phrase 'within its TOP Area or for which it has been notified by another TOP under R3' in R1 immediately following (IROL).

Yes

No

TOP-001-2, R3 Moderate VSL – the word "affected" has been omitted and needs to be inserted. TOP-003-2, R1 & R2 – The use of the term 'element' in the VSLs for these requirements is confusing. What is an element? Is it restricted to the four items listed under R1 and R2 or could it be multiple items from R1.1 and R2.1 or some combination there of? TOP-003-2, R5 – The single VSL for this requirement is all or none. If a single data point is missing, the violation is Severe. Couldn't this requirement have feathered VSLs such that the more data points missing the more severe the violation would become?

The definition of Reliability Directive is contained in COM-002-3 and that standard hasn't been posted for comment/ballot at this time. What happens if the TOP standards are approved and the COM-002-3 standard is subsequently not approved?

Individual

Chris de Graffenried

Consolidated Edison Co. of NY, Inc.

No

Comments: Requirements R1 and R2 should not be separated. Having them broken out in this manner could allow entities to potentially be in double jeopardy when non-compliance occurs. The original language provided for a very narrow limitation on the reasoning and the contact; and they were tied together. This language somewhat allows for the potentially different reasoning being allowed for one's inability to provide notice. If each function needs to be separate, then they should break out R4 into two requirements. Who's to say that the information is requested AND available? In TOP-001-2 R3 the phrase "known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis" is confusing. The Glossary defines Emergency as any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System. The Glossary defines Operation Planning analysis as an analysis of the expected system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). What is the difference between TOPs KNOWN to be effected by an anticipated Emergency from those EXPECTED to be effected by an anticipated Emergency. The Requirement should state TOP's expected to be affected by an anticipated Emergency. Those TOP's known to be affected are part of the group expected to be affected. Operations Planning occurs in the Day ahead. An actual Emergency cannot occur in the Day Ahead. The word actual should be removed. The SDT should scope R3 to the concept of Operational Planning as defined in the Glossary. The Time Horizon in the Requirement is Operations Planning. Suggest rewording Requirement R3 to: R3. Each Transmission Operator shall inform its Reliability Coordinator and those Transmission Operators that are expected to be affected by an anticipated Emergency based on its assessment of its Operational Planning Analysis. Without an expressed time period for the notification in R6, doesn't this create an opportunity for broad interpretations of what is

permissible and what's not? It also allows for inconsistent treatment. An auditor's view might be very different from an entity's view. Also, regarding TOP-001-2 R6, which states "Each Balancing Authority and Transmission Operator shall notify the Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetering equipment, control equipment and associated communication channels between the affected entities." This is a big concern. If there is coordination and notification between Reliability Coordinators, but no notification by one of the Reliability Coordinator's to the entities within the affected other Reliability Coordinator's footprint, would that be non-compliant? To ensure proper communications, notifications, and awareness there should only be one Reliability Coordinator communicating to its entities. It is impractical for Balancing Authorities and Transmission Operators to "drill down" and have to notify entities outside of their footprints of the aforementioned planned outages. Regarding TOP-001, Requirement R8: The drafting team needs to define the term "internal area reliability" in order to improve the clarity of the standard.

No

Comments: In Requirement R2 the Drafting Team needs to define the term "internal area reliability" in order to improve the clarity of the standard. Regarding Requirement R3: Would notifying GO's of "their roles" in the IROL/SOL mitigation plan provide them market power or represent a violation of Order 888 Firewall? Requirement 3 should be deleted. Market rules may prohibit the TOP from notifying all identified registered entities of their involvement in a given Operational Planning Analysis. This notification function may need to be performed by the RC.

Comments: TOP-001-2 is referencing a NERC definition for "Reliability Directive" which is not in effect today and is listed on the Definitions of Terms Used in Standard, page 2. It is stated that the definition of "Reliability Directive" would be written by the Reliability Coordinator Standards Drafting Team (Project 2006-06), and post it for vetting by the industry sometime in the future. If this standard is approved now and the definition for "Reliability Directive" changes because of the Project 2006-06 work, the TOP standards will have to be revisited. The Project 2006-06 Drafting Team should be coordinating its work with this project to develop an "across the board" usable definition. This Comment Form states under Background Information: o 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." It is not apparent where the 2006-06 team added "Adverse Reliability Impacts" to the definition. This change also impacts compliance to COM-002.

Individual

Michelle R D'Antuono

Ingleside Cogeneration LP - Occidental Chemical Corporation

Yes

From the GO/GOP perspective, Ingleside Cogeneration LP believes that the SDT has captured the appropriate circumstances for when a Reliability Directive is issued and identified – and the circumstances under which it may be not be possible to accommodate one.

Yes

Yes

Although we would prefer to see a consolidated RC-BA-TOP data specification, Ingleside Cogeneration LP agrees that TOP-003-1 is a good first step in that direction. Any help the SDT can provide to reduce overlap in data requests and to drive to a common format is appreciated.

Yes

Ingleside Cogeneration LP believes that the requirements applicable to a GO/GOP carry VRFs, VSLs, and Time Horizons consistent with those assigned to similar requirements.

Individual

David Thorne

Pepco Holdings Inc
No
PHI supports the comments provided by the ISO/RTO Standards Review Committee.
No
PHI supports the comments provided by the ISO/RTO Standards Review Committee.
Yes
No
PHI supports the comments provided by the ISO/RTO Standards Review Committee.
PHI supports the comments provided by the ISO/RTO Standards Review Committee.
Group
Dominion
Connie Lowe
Yes
Yes
No
If this question was meant to refer to TOP-003-2, then Dominion offers the following comments: M5 reads "Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Operator, and Transmission Owner receiving a data specification in Requirement R2 or R3 shall make available evidence that it has satisfied the obligations of the documented specifications for data in accordance with Requirement R4. Such evidence could include, but is not limited to, electronic or hard copies of data transmittals or attestations of receiving entities." Since R2 was added, Dominion suggest M5 should read as "receiving a data specification in Requirement R3 or R4 shall make available evidence that is has satisfied the obligations of the documented specifications for data in accordance with Requirement R5....".
Yes
Page 1 and Page 15 of the Violation Risk Factor and Violation Severity Level Assignments document, titles reads; Justification for Assignment of Violation Severity Levels for TOP-001-2, TOP-002-2, TOP-003-2:, Dominion suggests changing TOP-002-2 to TOP-002-3.
Individual
Mahmood Safi
Omaha Public Power District
No
OPPD is concerned with Requirements (R8 and R9) related to System Operating Limits (SOLs). We would like to ask the SDT to clarify what the word "continuous duration" means in terms of timing. We understand the "continuous duration" is based on Facility Rating or Stability criteria, however, without any defined time frame, the term "duration" would be subject to variety of interpretations. OPPD supports a time window to allow TOP to return from SOL similar to IROL Tv.
Yes
No
OPPD is requesting clarification on operational data requirements (R1 and R3) related to "documented specification for the data necessary for it to perform..." What the document should include that is specifying operational data request from or to other Transmission Operators. Additionally, how often operational data specification document should be provided/updated to or from other Transmission Operators.
Yes

Individual

David Burke

Orange and Rockland Utilities, Inc.

No

Comments: Requirements R1 and R2 should not be separated. Having them broken out in this manner could allow entities to potentially be in double jeopardy when non-compliance occurs. The original language provided for a very narrow limitation on the reasoning and the contact; and they were tied together. This language somewhat allows for the potentially different reasoning being allowed for one's inability to provide notice. If each function needs to be separate, then they should break out R4 into two requirements. Who's to say that the information is requested AND available? In TOP-001-2 R3 the phrase "known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis" is confusing. The Glossary defines Emergency as any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System. The Glossary defines Operation Planning analysis as an analysis of the expected system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). What is the difference between TOPs KNOWN to be effected by an anticipated Emergency from those EXPECTED to be effected by an anticipated Emergency. The Requirement should state TOP's expected to affected by an anticipated Emergency. Those TOP's known to be affected are part of the group expected to be affected. Operations Planning occurs in the Day ahead. An actual Emergency cannot occur in the Day Ahead. The word actual should be removed. The SDT should scope R3 to the concept of Operational Planning as defined in the Glossary. The Time Horizon in the Requirement is Operations Planning. Suggest rewording Requirement R3 to: R3. Each Transmission Operator shall inform its Reliability Coordinator and those Transmission Operators that are expected to be affected by an anticipated Emergency based on its assessment of its Operational Planning Analysis. Without an expressed time period for the notification in R6, doesn't this create an opportunity for broad interpretations of what is permissible and what's not? It also allows for inconsistent treatment. An auditor's view might be very different from an entity's view. Also, regarding TOP-001-2 R6, which states "Each Balancing Authority and Transmission Operator shall notify the Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetering equipment, control equipment and associated communication channels between the affected entities." This is a big concern. If there is coordination and notification between Reliability Coordinators, but no notification by one of the Reliability Coordinator's to the entities within the affected other Reliability Coordinator's footprint, would that be non-compliant? To ensure proper communications, notifications, and awareness there should only be one Reliability Coordinator communicating to its entities. It is impractical for Balancing Authorities and Transmission Operators to "drill down" and have to notify entities outside of their footprints of the aforementioned planned outages. Regarding TOP-001, Requirement R8: The drafting team needs to define the term "internal area reliability" in order to improve the clarity of the standard.

No

Regarding Requirement R3: Would notifying GO's of "their roles" in the IROL/SOL mitigation plan provide them market power or represent a violation of Order 888 Firewall? Requirement 3 should be deleted. Market rules may prohibit the TOP from notifying all identified registered entities of their involvement in a given Operational Planning Analysis. This notification function may need to be performed by the RC.

Comments: TOP-001-2 is referencing a NERC definition for "Reliability Directive" which is not in effect today and is listed on the Definitions of Terms Used in Standard, page 2. It is stated that the definition of "Reliability Directive" would be written by the Reliability Coordinator Standards Drafting Team (Project 2006-06). and post it for vetting by the industry sometime in the future. If this

standard is approved now and the definition for "Reliability Directive" changes because of the Project 2006-06 work, the TOP standards will have to be revisited. The Project 2006-06 Drafting Team should be coordinating its work with this project to develop an "across the board" usable definition. This Comment Form states under Background Information: o 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." It is not apparent where the 2006-06 team added "Adverse Reliability Impacts" to the definition. This change also impacts compliance to COM-002.

Individual

Joe Petaski

Manitoba Hydro

No

-R1 - Manitoba Hydro suggests that the first instance of 'identified' in R1 be removed as it is redundant given that R1 already specifies that the Reliability Directive is 'identified as such'. As drafted, the standard suggests that there is a difference between an 'identified Reliability Directive' and a 'Reliability Directive'. -Data Retention (1.3) – The data retention requirements are too uncertain for two reasons. First, the requirement to "provide other evidence" if the evidence retention period specified is shorter than the time since the last audit introduces uncertainty because a responsible entity has no means of knowing if or when an audit may occur of the relevant standard. Secondly, it is unclear what 'other evidence', besides the specified logs, recordings and emails, an entity may be asked to provide to demonstrate it was compliant for the full time period since their last audit. This comment applies to TOP-001-2, TOP-002-3, and TOP-003-1.

No

-R1 - Given that an Operational Planning Analysis is itself an assessment of planned operations (i.e. the definition of Operational Planning Analysis is 'An analysis of the expected system conditions for the next day's operation...') it is unnecessary to state that the Operational Planning Analysis must allow an assessment of planned operations. Accordingly, Manitoba Hydro suggests that the phrase '...that will allow it to assess...' be replaced with "assessing".

No

-M1 – This measure goes beyond the requirements of the standard, as there is no requirement for a specification document to be dated. Manitoba Hydro suggests either striking 'dated' from M1 or adding the requirement to have a 'dated documented specification' to R1. -M2 – Same comment as M1. Manitoba Hydro suggests either striking 'dated' from M2 or adding the requirement to have a 'dated documented specification' to R2. A -R3 - For consistency with R1 and overall clarity, Manitoba Hydro suggests changing the wording of R3 to 'Each Transmission Operator shall distribute its documented specification developed in accordance with R1 to those entities that have data required by the Transmission Operator to support its Operational Planning Analysis and Real-time monitoring'. The VSL for R3 should be changed accordingly as well. -R4 - For consistency with R2 and overall clarity, Manitoba Hydro suggests changing the wording of R4 to 'Each Balancing Authority shall distribute its documented specification developed in accordance with R2 to those entities that have data required by the Balancing Authority to perform its Real-time monitoring'. The VSL for R4 should be changed accordingly as well.

No

-TOP-002-3 R3 VSL - The wording of the VSL is unclear. Manitoba Hydro suggests changing the wording of the VSL as follows (the severe VSL of TOP-002-3, R3 is provided as an example): 'The Transmission Operator did not notify either four or more NERC registered entities, or more than 15% of the NERC registered entities identified in the plan(s) as to their role in the plan(s). '

Group

LG&E and KU Services

Brent Ingebrigtsen

No

LG&E and KU Services believe that any definition of a Reliability Directive should require that within

the communication it should be stated that "This is a Reliability Directive." to avoid any possibility of confusion.

Yes

No

LG&E and KU Services do not believe that data/evidence retention requirements should be modified by the Compliance Enforcement Authority. This potentially will result in different data retention requirements across regions. A Compliance Enforcement Authority should enforce only what is written within the standard and not have the option of expanding the requirement. 4. 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.

Individual

Dana Showalter

E.ON Climate & Renewables

No

ECRNA appreciates the efforts of the drafting team in eliminating duplicative requirements and efforts, as this is an important part of developing clear and concise standards. However, we are concerned about the end result of an unbounded data specification. Although requirements R1 through R4 are directed toward the Balancing Authority and Transmission Operator, these requirements have a direct impact on the other applicable entities. The lack of guidance to and expectations of the data and format could and most likely will lead to a wide range of data specifications from the multitude of Balancing Authorities and Transmission Operators in North America. Entities that own or operate facilities in multiple regions and work with many BAs and TOPs may have difficulty responding to each individual specification's needs, including timeframe, and format. Also considering the unknowns in the data specifications, the high severity factor on R5 seems unreasonable. In addition, the sub-requirements to R1 and R2 could be written more clearly to identify who the TOPs and BAs are expected to mutually agree with and request information from. One can assume the applicable entities listed in the standard, but explicitly stating this within the standard is a better method and ensures entities are provided an opportunity to provide input in the data specification format.

No

Considering the unknowns in the data specifications, the high severity factor on R5 seems unreasonable.

Individual

Don Jones

Texas Reliability Entity

No

•In R1, the phrase "and identified as such" is redundant and unnecessary in that "identified" already exists within the sentence. Furthermore, the addition of the word "identified" or phrase "identified as such" inserts undue ambiguity and complication, and we are concerned that the "identified" concept will actually provide more opportunities for miscommunications during tense situations. •In R1, we are concerned that "Directive" is being proposed with descriptive terms (e.g., "reliability"), and if the descriptive terms are not used explicitly an entity may not be compelled to act accordingly (also may provide leverage for a perceived loophole in compliance activities that could be exploited—"I was unaware it was a {insert descriptive term} Directive"). •There should be a time frame associated with requirement R2. Perhaps add "within the timeframe determined for the Directive being issued" to end of sentence. Also, we suggest removing "identified" from requirement R2 (see comments on R1). •There should be a time frame associated with the communication required by Requirement R5. •R5

should explicitly include IROL, SOL, and Stability Limit violations in the examples since the proposed definition of Adverse Reliability Impact implies instability and Cascading outages. •We suggest rewriting R5 as follows: “Each Transmission Operator shall inform its Reliability Coordinator and other affected Transmission Operators of its operations known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas within a timeframe that is sufficient for the RC and affected TOP’s to respond to the system condition, unless conditions do not permit such communications. Such operations may include, but are not limited to, Interconnection Reliability Operating Limit (IROL) violations greater than Tv, System Operating Limit (SOL) violations, Stability Limit violations, relay or equipment failures, and changes in generation, Transmission, or Load.” •In R9, the use of “continuous duration” in the revised language is confusing and should be removed. It would be better to clearly rely on the other standards that relate to identifying IROLs and SOLs (including duration limits), which may have multiple time limits associated with various operating conditions. We note that an SOL may not be based on a single Facility Rating but may actually be a group of Facilities aggregated into a single limit. We suggest saying: “for a continuous duration that would cause a violation of the Facility Rating or Stability criteria, including duration, upon which it is based”.

Yes

No

•Regarding R1, we are concerned that the proposed requirement gives each TOP too much latitude to determine what data it considers necessary. This may cause confusion due to significant differences in data specified by different TOPs and the ability of TOPs to unilaterally change their data specifications. We would prefer that the standard include a basic list of data to be included in the specification. •The reference to “mutually agreeable format” in R1 part 1.2 is problematic because it allows the respondents to interfere in the TOP’s data collection process. The TOP should be allowed to dictate a reasonable format for data submission. •In R2, we are opposed the removal of “Operational Planning Analyses” (OPA) for a Balancing Authority in this requirement, because the BA is “the responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real-time.” A BA should create a documented specification for the data necessary for it to perform an OPA just as a TOP does. •The reference to “mutually agreeable format” in R2 part 2.2 is problematic because it allows the respondents to interfere in the BA’s data collection process. The BA should be allowed to dictate a reasonable format for data submission. •In R3 we suggest changing “operating analysis” to “Operational Planning Analysis,” which is a more precise term for what appears to be intended. The same change should be made in Measure M3. •In R4 we suggest adding “Operational Planning Analysis,” to be consistent with our comment that R2 should require “Operational Planning Analysis” data in the BA’s data specification. •In the Measures, please check and correct the references to Requirement numbers – some references are to the wrong requirements. •Under Data Retention, in the 4th bullet starting with “Each Balancing Authority...”, the phrase “and operating analysis assessment processes and” should be struck because it does not align with requirement R4 as currently written. However, we support adding “Operating Planning Analysis” in R4, and this data retention reference should be consistent with the requirement.

No

•Regarding the VSL for TOP-001-2 R5, we suggest that it be based on a percent of applicable TOPs rather than number of TOPs, which would accommodate various sized entities. •Regarding the VSLs for TOP-001-2 R9 and R11, we recommending adding a time duration reference relating to SOL violations, even if it is not a definite number of minutes. •Referring to the VSLs for TOP-003-2 R1, there are only four elements listed, so the reference to “four or more” is nonsensical. Also, there is no difference between omitting four elements and not providing a documented specification at all. Finally, the four listed elements do not appear to have equal importance – perhaps the VSL levels should be assigned based on which elements are missing.

•Referring to the posted “Issues Database,” under Order 693 ¶ 1604/1608, the red-lined language is not actually in the referenced requirement. Does the drafting team contend that the proposed requirements satisfy this FERC directive? •Referring to the posted “Issues Database,” under Order 693 ¶ 1636 (TOP-004), this document suggests that a 30-minute limit is contained in the requirements, but that limit is not in the language that is now posted. Does the drafting team contend that the proposed requirements satisfy this FERC directive? In general, NERC needs to make sure the

Issues Database is consistent with the latest draft of the requirements. •The VRF/VSL Assignment Document needs to be cleaned up. There are numerous references to incorrect requirement numbers. On page 3, TOP-001-2 Requirement R3 is struck from the list of "High" VRFs, but it is assigned a high VRF in the posted standard. Also, the title of TOP-001-2 is stated incorrectly in this document (at the beginning).

Individual

Scott Berry

Indiana Municipal Power Agency

no comment

no comment

No

IMPA believes that the entities (Transmission Operator and Balancing Authority) should be required to create a documented specification that lists exactly what the entities (in R5) need to provide to them to meet the requirement and not be allowed to say that "it is in our manuals and/or agreements." When the Transmission Operator and/or Balancing Authority only references their manuals, it is up to the entity (in R5) to read the manuals that are referenced and then try to come up with a documented specification listing on their own which may or may not include everything that is required by the TO or BA which makes the current draft standard's language very ambiguous. IMPA is not objecting to these entities using manuals as long as a specific documented specification is created and distributed that does more than just list the name of manuals. The documented specifications need to be detailed in what is required from entities to aid in preventing possible non-compliance issues due to an entity missing an item in a manual or including unnecessary items due to being left to their own interpretations.

no comment

No other comments

Individual

Rich Salgo

NV Energy

Yes

Yes, however, there are a few points to note: Part A, Section 1 continues to title this standard as "Coordination of Transmission Operations, while the header of the Standard was changed to simply "Transmission Operations". The requirements R6 and R8 appear to be outside the realm of real-time operations, R6 dealing with planned outages of telemetry, comm, and control equip, and R8 dealing with communication of SOL's or other limits. It is confusing to mix in Operations Planning type requirements in a standard that otherwise deals with real-time grid operations. Suggest relocating these two to the Operations Planning Standard, TOP-002-3.

Yes

Yes

In the re-draft of these three standards, TOP-001, -002, and -003, we seem to have lost the concept of Planned Outage Coordination for BES facilities (a whole Standard was devoted to the process). In viewing the mapping document, it is stated that the requirements for such outage coordination that used to reside in TOP-003-1 are now replaced by R1 and R2 of TOP-003-2. If this is the case, then all of the activities of outage coordination are to be encapsulated in the clause "documented specification for the data necessary for it to perform its required Operational Planning Analyses..." While it may be covered in this extremely broad clause, the SDT nevertheless gave prominence to the coordination of telemetry outages within a specific requirement R6 of TOP-001-2. If telemetry outages have a separate requirement, then shouldn't planned outage coordination of BES facilities rise to the level of importance that would merit its own requirement?

Individual

Gregory Campoli

New York Independent System Operator
No
Communications must be a well defined, consistent and established process to promote clear and accurate communications between operators for both normal and emergency conditions. This standard could be interpreted as to require an extra phrase during emergencies that would unnecessarily complicate communications. The requirement is reasonable if the identification of a 'Reliability Directive' may be done in a policy or procedure that is communicated to the BA, GOP, DP or LSE as a communication protocol that addresses normal and emergency communications. Otherwise requiring different verbal communication protocols for normal or emergency conditions will add a level of risk currently not observed.
Individual
Martin Bauer
US Bureau of Reclamation
Yes
Yes
No
The language change in R1 has not been incorporated into the sub requirements. The requirement R1 was modified to eliminate the second party. A mutual agreement is required in R 1.2 but only party is listed in R1. The language should specify that the TOP is to coordinate its data requests with the appropriate entities and seek mutal agreement on the format.
Yes
Individual
Alice Ireland
Xcel Energy
No
R1. Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall comply with each identified Reliability Directive issued by its Transmission Operator, unless the respective entity informs its Transmission Operator that such actions would violate safety, equipment, regulatory, or statutory requirements. We would like to see additional clarification to clarify "equipment", suggest using "equipment limitation" or "equipment rating" R4. Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, provided that the requesting entity has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, regulatory, or statutory requirements. This requirement should be modified so as not to place the burden on the assisting entity to demonstrate that the requesting entity has implemented "comparable emergency procedures". Suggest the following language: "Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment ratings, regulatory, or statutory requirements. R5. Each Transmission Operator shall inform other Transmission Operators of its operations known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas unless conditions do not permit such communications. Such operations may include relay or equipment failures and changes in generation, Transmission, or Load. This requirement appears to duplicate PRC-001-1 R2 and R5. It is assumed, but cannot be verified that those requirements will be eliminated in a future approved version of that standard. R9 - We appreciate the drafting team's efforts. However, we are still concerned that R9 will not allow the Transmission Operator the flexibility to identify the best SOL

recovery approach, without incurring a violation of the requirement. Instead, the TOP may be forced to shed load in order to avoid violating the requirement. This is not ideal, especially when the situation could be mitigated successfully with alternative measures. It is not clear if an entity is allowed to use an RC-approved contingency plan to mitigate a situation that would cause a Facility Rating violation (i.e. the Facility Rating is the SOL), without also incurring a violation of R9. To further explain, if an entity foresees exceeding an SOL in its OPA, and obtains approval from the RC on their proposed contingency plan (which includes a Facility Rating violation), will that entity be considered in violation of R9 once the exceedance occurs and the contingency plan is implemented? R10. Each Transmission Operator shall inform its Reliability Coordinator of its actions to return the system to within limits when an IROL, or each SOL identified in Requirement R8, has been exceeded. This requirement should specify a sustained period which establishes when it is considered that the entity has returned below the limit (or some other value so as to not misconstrue momentary recoveries as meeting this requirement).

Yes

No

Applicability – why are Distribution Providers not subject to this standard? Is it possible that a TOP or BA may need information from a DP to perform an “OPA”? “Mutually agreeable” in 1.2 should be removed. The TOP and BA should work with the subject entities, however stating that something must be mutually agreed upon could create delivery and acceptance of data in a less than desired form solely to meet the words of the requirement.

There is reference in each draft standard to deleting some requirements from PRC-001 but those proposed changes are not show in any proposed drafts or implementation plans (only 1 PRC-001 requirement is listed in the implementation plan).

Individual

Anthony Jablonski

ReliabilityFirst

No

ReliabilityFirst has the following comments for consideration: 1. Definition of Reliability Directive - ReliabilityFirst believes there could be a possible issue with the definition of “Reliability Directive” being developed and approved via another drafting effort (i.e. Project 2006-06). In the hypothetical situation where the TOP-001-2 standard is approved and the definition of “Reliability Directive” is drastically changed through the Project 2006-06 effort, there could possibly be a disconnect between the TOP-001-2 requirements and the “Reliability Directive” definition. Also, ReliabilityFirst recommends adding a parenthetical (“e.g. IROL or SOL violations”) to the end of the definition for further clarity. 2. R2 – There is no time qualifier specified in R2 dealing with the timeframe in which the applicable entity has to inform its Transmission Operator of its inability to perform an identified Reliability Directive. ReliabilityFirst recommends the SDT consider adding language to include a timeframe for the entity to inform the Transmission Operator (such as one hour). Absent any specified timeframe, an applicable entity could hypothetically inform its Transmission Operator of its inability to perform an identified Reliability Directive 30 days after the Reliability Directive was issued, and still be compliant based on the current words of the requirement. 3. R4 – The term “emergency” is used within this requirement and ReliabilityFirst seeks clarification on whether this is referring to the NERC definition of “Emergency” (as defined in the NERC Glossary of terms)? If so, this term should be capitalized. 4. R5 - The last sentence in R5 is not really a requirement, but rather a measure on how to comply with the requirement. ReliabilityFirst recommends deleting the last sentence of R5 and incorporating it into the corresponding Measure. 5. R6 – ReliabilityFirst recommends removing the term “negatively impacted interconnected NERC registered entities” and replace it with the associated functional entities (e.g. Balancing Authority, Generator Operator, etc.). 6. R8 – ReliabilityFirst recommends removing the term “while not IROL’s” from R8. SOL is a NERC defined term and the extra qualifier is not needed. 7. R10 and R11 – ReliabilityFirst recommends swapping the order of R10 and R11. From a chronological standpoint, the Transmission Operator will “act or direct others to act, to mitigate...” (R11) prior to “informing its Reliability Coordinator of its actions” (R10). 8. Data retention – ReliabilityFirst believes the first paragraph of the Data Retention section is in conflict with the additional paragraphs of the Data Retention section. For example, the

last sentence states "the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit" as a catch all. Regardless of the other shorter data retention periods located in the subsequent paragraphs, the entity still needs to retain the evidence for the full time period since the last audit. ReliabilityFirst recommends only keeping the first paragraph and deleting the subsequent paragraphs in the Data Retention section.

No

ReliabilityFirst has the following comments for consideration: 1. R1 – ReliabilityFirst recommends removing the rationale box from the standard. ReliabilityFirst believes this is not really the rationale for the requirement but rather explains how to measure (show evidence) for the requirement. 2. R2 – ReliabilityFirst recommends deleting the following words from the requirement, "which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1". ReliabilityFirst believes this language does not add anything to the requirement. 3. R2 and R3 – R3 requires the Transmission Operator to notify all NERC registered entities identified in the plan(s) but there is no corresponding requirement for the Transmission Operator to identify NERC registered entities in their plans. ReliabilityFirst recommends incorporating this concept into R2. 4. Data retention – ReliabilityFirst believes the first paragraph of the Data Retention section is in conflict with the additional paragraphs of the Data Retention section. For example, the last sentence states "the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit" as a catch all. Regardless of the other shorter data retention periods located in the subsequent paragraphs, the entity still needs to retain the evidence for the full time period since the last audit. ReliabilityFirst recommends only keeping the first paragraph and deleting the subsequent paragraphs in the Data Retention section.

No

ReliabilityFirst has the following comments for consideration: 1. R1 and R2 – ReliabilityFirst recommends changing the phrase "shall create..." to "shall have..." in R1 and R2. 2. R1 and R2 – ReliabilityFirst recommends changing Part 1.2 and Part 2.2 to state "A format". ReliabilityFirst believes it may be difficult to audit and enforce the phrase "mutually agreeable". 3. R3 – ReliabilityFirst seeks clarification on the term "operating analysis assessment" used in R3. Is this language referring to the Transmission Operators Operational Planning Analyses as required in R1? If not, can the SDT clarify what the phrase "operating analysis assessment" is referring to? 4. R3 and R4 – ReliabilityFirst seeks clarity on what the phrase "NERC-mandated reliability requirements" is referring to? Is it referring to FERC approved NERC standard requirements or does it encompass NERC Directives, CANs, NERC bulletins, etc. as well? 5. R3 and R4 – R3 references "those entities" and R4 just references "entities". ReliabilityFirst recommends modifying either R3 or R4 to use consistent language. 6. Data retention – ReliabilityFirst believes the first paragraph of the Data Retention section is in conflict with the additional paragraphs of the Data Retention section. For example the last sentence states "the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit" as a catch all. Regardless of the other shorter data retention periods located in the subsequent paragraphs, the entity still needs to retain the evidence for the full time period since the last audit. ReliabilityFirst recommends only keeping the first paragraph and deleting the subsequent paragraphs in the Data Retention section.

No

For the TOP-001-2 standard, ReliabilityFirst disagrees with the VSLs for the following reasons: 1. VSLs for R3, R5 and R6 – ReliabilityFirst recommends adding the graduated language of "or X% or less of the entities whichever is less" to the VSLs (this is consistent with the language stated in the TOP-002-3 and TOP-003-2 VSLs). This is needed for smaller Transmission Operators which may have less than four other TOPs to inform. 2. Note in front of VSL 5 – ReliabilityFirst recommends removing the note in front of VSL5 since the note is contrary and is in conflict on how the VSL is set up.

Group

Kansas City Power & Light

Michael Gammon

No

Requirements R3 & R5 requires TOP's to notify all other "affected" TOP's in instances of emergency or

Adverse Reliability Impact. The term "affected" is a debatable condition and subject to interpretation. As proposed, this requirement will be difficult to audit and will cause uncertainty in the industry. Recommend the requirement be modified to alert other TOP's whenever a TOP in an emergency or Adverse Reliability Impact operating condition becomes aware of operating conditions that would result in exceeding an SOL or IROL operating limits under N-1 contingency conditions for other TOP facilities. Modifications for these two requirements will result in subsequent changes to the Measures and VSL's for requirements R3 & R5. In requirements R9 and R11 the 30-minute transition from an unknown operating state to a known state is lost for operating from an n-1 state to a n-2 state therefore leading to an immediate violation of R9 if the facility rating is exceeded. Also, the inclusion of IROL's in R10 and R11 makes these requirements confusing as to who is responsible for mitigation, IROL's should be removed from here as they are considered in the IRO requirements, these requirements should only address SOL's. Requirement R8 uses the term "continuous duration". The term "continuous duration" will be subject to interpretation as to its meaning and intent. As proposed, this requirement will be difficult to audit and will cause uncertainty in the industry. Also, a draft Reliability Directive definition is included in this standard but needs approval in the COM-002 standard, what if COM-002 does not get approved?

No

The words "develop a plan" in R2 are too broad. Recommend the requirement be modified to include, "within its TOP area" as in R1. Also the use of "Contingency event conditions" is not clear in requirement R1. Recommend specifying n-1 as the contingency scope.

No

These requirements do not recognize the limitations of data exchange capability with an entity and the sources of data an entity has. Recommend these requirements be modified to include "within the data exchange capabilities and data available of the recipient of the data specification".

No

The VSL for TOP-003-2, R5 does not recognize partially satisfying a request for data. Recommend the SDT consider a graduated set of severity levels similar to the other requirements in TOP-003-2.

No other comments.

Individual

Don Schmit

Nebraska Public Power District

No

Instead of using 'its' TOP in R1 we suggest using 'a' TOP since it is possible for the listed entities to have multiple TOPs. In R3, suggest rewording as "Each Transmission Operator shall inform its Reliability Coordinator, and other Transmission Operators, of each actual and anticipated Emergency that they are known or expected to be affected by, based on its assessment of its Operational Planning Analysis". The existing language doesn't clearly specify what is to be communicated with affected entities. R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9, even in situations where the initiating event was outside of design criteria. Current language allows exceedance of an IROL for a specific time, but does not appear to give any time to readjust the system for the less severe SOLs. This does not seem reasonable. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? This brings us to the issue of R8. R8 is unclear. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? Suggest "Each Transmission Operator shall inform its Reliability Coordinator of each SOL identified by the Transmission Operator as supporting the reliability of its Transmission Operator Area". With the inclusion of internal area reliability in R8 and R9, aren't these requirements now in conflict with the purpose of the standard which is directed toward impacts on the reliability of the interconnection? Including IROLs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROLs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROLs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather

than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well.

No

Even though the SDT directs us to the SOL methodology in the FAC standards which specify N-1 contingencies, R1 is not as clear in specifying N-1 contingencies as the old R6 was. We would prefer to maintain that clarity. We suggest the following language for R1: "Each Transmission Operator shall have an Operational Planning Analysis assessing whether the planned Transmission Operator Area operations for the next day will exceed the area Facility Ratings or Stability Limits during anticipated normal and Contingency (at a minimum N-1 Contingency planning) event conditions." Requiring the TOP to develop a plan to operate within each IROL in R2 is too broad. To narrow the scope of this requirement we suggest inserting the phrase 'within its Transmission Operator Area or for which it has been notified by another TOP under R3' in R1 immediately following (IROL).

No

Comments: Requirements R1 & R2 do not put any meaningful bounds on the data that a TOP or BA may request in the name of monitoring real-time operations. There is no check or balance on specifying timeframes when the data is required either. Attachment 1 TOP-005-1 contained the type of data that may be required and as such provided a framework for what type of data was required for real-time monitoring of the Bulk Electric System. As written, it would be possible for a BA or TOP to request data that a registered entity does not have available and require it in an unrealistic timeframe. This puts those entities in a position where they cannot comply with the standard, even though the data requested may not be important in the monitoring of the Bulk Electric System. There need to be reasonable limits on the information requested and how quickly new information may be required from other registered entities.

No

TOP-001-2, R3 Moderate VSL – the word 'affected' has been omitted and needs to be inserted. TOP-003-2, R1 & R2 – The use of the term 'element' in the VSLs for these requirements is confusing. What is an element? Is it restricted to the four items listed under R1 and R2 or could it be multiple items from R1.1 and R2.1 or some combination there of? TOP-003-2, R5 – The single VSL for this requirement is all or none. If a single data point is missing, the violation is Severe. Couldn't this requirement have feathered VSLs such that the more data points missing the more severe the violation would become?

The definition of Reliability Directive is contained in COM-002-3 and that standard hasn't been posted for comment/ballot at this time. What happens if the TOP standards are approved and the COM-002-3 standard is subsequently not approved?

Individual

Bob Thomas

Illinois Municipal Electric Agency

No

Illinois Municipal Electric Agency supports comments submitted by the SERC OC Standards Review Group and the ISO/RTO Standards Review Committee concerning the need to address the "Reliability Directive" definition in concert with COM-002-3.

No

Illinois Municipal Electric Agency supports comments submitted by Indiana Municipal Power Agency concerning the need for clearer communication of data specifications in R3 and R4 in order to facilitate compliance with R5.

No

Illinois Municipal Electric Agency supports comments submitted by the ISO/RTO Standards Review Committee concerning the need to build some flexibility into the VSL for TOP-003-2 R5.

Illinois Municipal Electric Agency appreciates SDT efforts to develop a sixth draft for this proposed Reliability Standards development. While we realize the SDT will never be able to resolve all concerns, it appears from our own review and our review of other entity comments that additional revisions are needed to achieve a level of quality that will minimize difficulties complying with these Reliability

Standards.
Individual
Greg Rowland
Duke Energy
No
<p>While the drafting team has made several improvements to this standard, we believe these additional changes are needed:</p> <ul style="list-style-type: none"> • The definition of Reliability Directive includes the defined term “Adverse Reliability Impact”, which should be replaced by the actual wording of latest BOT-approved definition of “Adverse Reliability Impact”, since it has not yet been approved by FERC. If the SDT decides not to replace Adverse Reliability Impacts with the actual wording of the latest BOT-approved definition, then the SDT should delete the “s” from “Impacts”. • R8 – We believe that the phrase “supporting its internal area reliability” should be further clarified in some way. The inclusion of the undefined concept of “supporting internal area reliability” creates undue compliance risk, since auditors could potentially find an entity non-compliant if no SOLs have been identified as “supporting its internal area reliability”. The drafting team could examine the disturbance reporting criteria in EOP-004-1 Attachment 1 to help develop a reasonable threshold for reporting SOLs to the Reliability Coordinator. • R8 – Consistent with R3, the Time horizon for R8 should only be Operations Planning. • R9 – The change that has been made to R9 could be interpreted to result in a violation if a facility rating is exceeded for any amount of time at all. Similar to an IROL’s Tv, SOLs identified under R8 should have an identified time period (such as 30 minutes) for mitigation without a violation. A change to R9 should be coupled with development of a reporting threshold for R8 as discussed above. • M1 – typo, left the “u” off the word “unless”. • Measures for R8 and R9 should be changed consistent with our suggested revisions to the requirements.
No
<ul style="list-style-type: none"> • R2 – Consistent with our comment above on TOP-001-2 Requirement R8, the phrase “supporting its internal area reliability” should be further clarified in some way. • M2 typo – the word “plan” has an extra “n”.
Yes
<ul style="list-style-type: none"> • R1.1 – Consistent with our Question #1 comment above on using the actual wording of the BOT-approved definition of “Adverse Reliability Impact” since it has not yet been approved by FERC, “Operational Planning Analysis” has likewise not yet been approved by FERC as of the latest version of the Glossary posted on the NERC website, December 13th, 2011. Suggest using the wording of the defined term. If the SDT decides to instead keep the defined term, “Analyses” should be “Analysis”. • R3 – Current wording is awkward. Suggest rewording as follows: “Each Transmission Operator shall distribute its data specification to entities that have data required for operating analysis assessment processes and reliability monitoring tools used by the Transmission Operator in meeting its NERC-mandated reliability requirements.” • R4 – Current wording is awkward. Suggest rewording as follows: “Each Balancing Authority shall distribute its data specification to entities that have data required for reliability monitoring tools used by the Balancing Authority in meeting its NERC-mandated reliability requirements.” • Measures and Data Retention – change to align with suggested R3 and R4 rewording above.
No
<ul style="list-style-type: none"> • TOP-001-2, R8 – Consistent with R3, the Time horizon for R8 should only be Operations Planning. • TOP-001-2 VSLs for R8 and R9 should be changed consistent with our suggested revisions to the requirements. Also see comment below regarding use of percentage ranges. • TOP-002-3 VSLs for R3 – the addition of the percentage range on the Lower VSL makes no sense. The “whichever is less” phrase on the other VSLs could push a violation into a higher VSL because of the percentage range. For example, if the TOP had 10 entities to notify and failed to notify one, then it would be a Moderate violation (10%) instead of Lower. If the TOP had 100 entities to notify and failed to notify four (less than 5%), then it would still be a Severe violation. • TOP-003-2 VSLs for R1 - “Analyses” should be “Analysis”, since “Operational Planning Analysis” is a defined term. • TOP-003-2 VSLs for R2 – Severe VSL should just say “four” instead of “four or more” because there are only four required elements. • TOP-003-2 VSLs for R3 and R4 – the addition of the percentage range on the Lower VSL makes no sense. See comment on TOP-002-3 VSLs for R3 above.

Individual
Edvina Uzunovic
The Valley Group, a Nexans Company
TOP-004-2 R4: If a Transmission Operator enters an unknown operating state (i.e. any state for which valid operating limits, as determined by System Operating Limits or real-time measurements, have not been determined), it will be considered to be in an emergency and shall restore operations to respect proven reliable power system limits (SOLs or Real-Time Limits) within 30 minutes. TOP-006-2 R1.2 Each Transmission Operator and Balancing Authority shall inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources, as determined with SOLs or Real-Time Calculated limits, available for use. TOP-006-2 R2: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor applicable transmission line status, real time operating capacity, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources. TOP-008-1 R2: Transmission Operator shall operate to prevent the likelihood that a disturbance, action, or inaction will result in an IROL or SOL violation in its area or another area of the Interconnection. In instances where there is a difference in derived operating limits, the Transmission Operator shall operate the Bulk Electric System to the actual real-time limits (if available) or the most limiting derived parameter. TOP-008-1 R3: The Transmission Operator shall disconnect the affected facility if the overload on a transmission facility or abnormal voltage or reactive condition persists and equipment is endangered. The Transmission Operator shall review the real time status and capacity of transmission facility prior to disconnecting, if applicable. In doing so, the Transmission Operator shall notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection prior to switching, if time permits, otherwise, immediately thereafter. TOP-008-1 R4: The Transmission Operator shall have sufficient information and analysis tools to determine the cause(s) of SOL violations. This analysis shall be conducted in all operating timeframes. The Transmission Operator shall use the results of these analyses to immediately mitigate the SOL violation. If applicable, and prior to immediate mitigation, the Transmission Operator shall review real time status and capacity of the equipment, and based on those, made necessary adjustments.
Individual
RoLynda Shumpert
South Carolina Electric and Gas
No
Please provide clarity on the phrase "support its internal area reliability" in R8.
No
Please provide clarity on the phrase "support its internal area reliability" in R2.
Yes
No
There is a mistake in the mapping document for TOP-001-2 R11 as the language doesn't match the language in the Standard. There is additional language in the mapping document that states "within 30 minutes," which the standard does not, and should not say. This occurs on page 36 for the mapping of current TOP-007 R2 to proposed TOP-001-2 R11. Additionally, SCE&G believes that it would be erroneous to remove TOP-004 R5 on the basis of the functional model. The functional model for the TOP stipulates that the TOP "is responsible for the real-time operating reliability of the transmission assets under its purview, which is referred to as the Transmission Operator Area. The Transmission Operator has the authority to take certain actions to ensure that its Transmission Operator Area operates reliably." If a situation were to arise where there was not sufficient time to contact the RC or if the RC was taking action that would put the TOP in jeopardy, SCE&G believes that the TOP has the right to separate from the Interconnection to protect the reliability of its system as is

spelled out in current standard TOP-005 R5.
Group
SERC OC Standards Review Group
Gerald Beckerele
No
We suggest that the definition of Reliability Directive should be modified 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 "an event that results in Bulk Electric System instability or Cascading". We also recommend that the Standard Drafting Team coordinate with the COM-002-3 Standard Drafting Team to ensure consistency in the Reliability Directive definition. We suggest the Standard Drafting Team further clarify or define the term "supporting internal area reliability" as an aid in demonstrating compliance and how this requirement enhances reliability. We suggest including "Real-time Assessments" in this standard to clarify Operations Planning and same day operations time horizons (Requirement 8). We request that the drafting team review and explain the differences in the time horizons for Requirements 3, 5 and 8.
No
Why did the Drafting Team use the terms "Facility Ratings" and "Stability Limits" in Requirement 1 rather than SOLs and IROLs as used in subsequent Requirements? We suggest the Drafting Team further clarify or define the term "supporting internal area reliability" as an aid in demonstrating compliance and how this requirement (R2) enhances reliability.
No
There appears to be ambiguity for R1 and R2 - is the VSL applicable to the TOP/BA requesting the data or is it applicable to the TOP/BA providing the data? If it applies to the TOP/BA requesting the data we would suggest that the SDT be consistent with the VSLs in IRO-10-1a.
See responses to questions above.
Data retention requirements for TOP-001-2, TOP-002-3 and TOP-003-2 need to align with the expectations of the compliance entity. "The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."
Group
Georgia System Operations
Neil Phinney
Yes
GSOC agrees in general but feels that some clarity should be provided. The purpose of the language "each SOL which, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis" (OPA) is not clear. Is the intent to clarify the meaning of SOL? If so the definition in the glossary should be updated to clarify the meaning and the clarification should be removed whenever used in TOP-001, 002, or 003. Is the intent to limit which SOLs are being referred to? Not each SOL but each SOL which have been identified as supporting the internal area reliability based on the assessment of its OPA. Could this language be deleted and still convey what is required?
No
GSOC feels that some clarity should be provided. In R1, the rationale confuses things. It states things that are not in the requirement and goes beyond the requirement. If something is intended by the language of R1 other what is stated, then that intent should be clearer in the requirement. For example if a process is required, then state so in the requirement. It should not be in a rationale. Also, the comment in the rationale about being able to complete the analysis even if tools are not available is inappropriate in this standard since the situation is covered in EOP-008-1. Remove the rationale and if needed clarify the requirement. R1 states that the TOP should be allowed to assess whether the planned operations for the next day within its Transmission Operator Area will exceed any of its Facility Ratings or Stability Limits during anticipated normal and Contingency event conditions. It does not state that an assessment of this must be done, only that it be allowed. R2 states that the TOP shall develop a plan to operate within each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) which has been identified by the TOP as supporting its internal

area reliability, identified as a result of the OPA performed in Requirement R1. R1 does not require that IROLs and SOLs be identified. What if the TOP does not identify if there are any SOLs as a result of the OPA? There are other examples in these standards in which something in the OPA is referred to but is not required to be in the analysis. Better clarity is needed regarding just what the end results of the analysis must be. R3 requires that entities identified in the plan be notified as to their role. Would this be initially and whenever their role changes thereafter? Or just once? Data Retention: It states that if a TOP is found non-compliant, it shall keep information related to the non-compliance until found compliant. It is inappropriate to use the phrase "found compliant." NERC and the REs do not find entities compliant.

No

R5 is too unilateral. A TOP could send a spec to an entity for some data that the entity is not able to provide and per this requirement the entity will still be required to provide it. There must be some mutual agreement to more than just the format. There must be agreement to what can be provided and that the data is needed by the TOP's operating analysis assessment processes and reliability monitoring tools used in meeting its NERC-mandated reliability requirements. Also some provision must be allowed to cover when data or the transfer method is unavailable (e.g., when an RTU goes down). A similar situation applies to BAs sending a spec to an entity.

GSOC believes that all 3 standards should be voted on together in one vote. They are too inter-related. One or two of these should not be approved if one of them is not approved.

Individual

Terri Pyle

Oklahoma Gas and Electric

No

A. In the draft TOP-001-2 standard, R1 and R2 both address complying with Reliability Directives. OG+E suggests these two requirements be combined into one requirement using similar language found in other standards that contain the same Reliability Directive requirement, such as IRO-001-1.1 R8 and the previous version of this standard for consistency purposes. B. Mitigation of IROLs is ultimately the responsibility of the RC. TOPs act under the direction of the RC when mitigating IROLs. TOP-001-2 R11 should clarify by adding the following to the beginning of the requirement. "Under the direction of the RC, each TOP shall act or direct others to act...". C. Please clarify the meaning of "internal area reliability" in R8. D. In R9, "continuous duration" warrants additional clarification. Is this 5, 10, 30, 60 minutes of operating outside the SOL? Or only continuous operation outside of SOL that results in ultimately exceeding the Facility Rating?

No

Regarding R2, please consider additional clarifying language that each TOP need only develop a plan to operate within IROL and SOL that is applicable to them. Also, clarify what "internal area reliability" means - is this the same as Transmission Operator Area discussed in R1?

Yes

Individual

Julie Lux

Westar Energy

Yes

No

The stated rationale for R1 raises more concerns than the actual language in R1. How can an entity complete an analysis by procedure? The rationale seems to indicate that an Operational Planning Analysis is possible without tools, please explain. Are anticipated contingency event conditions intended to be N-1 from the planned system configuration?

Yes

No additional comments.
Group
MRO-NSRF
Will Smith
No
Issue: Upon review of the NERC Glossary of Terms, please drop the "s" from "...or Adverse Reliability Impacts" within the definition of a Reliability Directive. Issue: M1; It is not necessary to repeat the Requirement within the Measure. Recommend "unless such actions would violate safety, equipment, regulatory, or statutory requirements, in accordance with Requirement R1", be removed from this Measure. Issue: M4; It is not necessary to repeat the Requirement within the Measure. Recommend "unless such actions would violate safety, equipment, regulatory, or statutory requirements", be removed from the Measure. Issue: Upon review, it is noted that 'Coordination of' has been struck from Purpose, however not removed from the Title of the Standard. Recommend changing 'interconnection' in the Purpose to 'Bulk Electric System (BES)' Issue: R3: The statement "...Transmission Operators that are known or expected to be affected..." the use of "known or expected" is redundant. Recommend removing 'known or expected' and have the requirement rewritten as follows: Issue: R3: Each Transmission Operator shall inform its Reliability Coordinator and Transmission Operators to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis. Issue: R8: The statement "...its internal area reliability..." should be clarified to state: R8: Each Transmission Operator shall inform its Reliability Coordinator of each of its SOLs which, while not IROLs, have been identified by the Transmission Operator as supporting its Transmission Operators area based on its assessment of its Operational Planning Analysis. Issue: M8: statement "...its internal area reliability..." should be clarified to state: "...has been identified by the Transmission Operator as supporting its Transmission Operators area, identified as a result of the Operational Planning Analysis..." Issue: Please clarify on the issue of SOLs. IROLs have a time limit but SOLs do not. Is the SDT requiring no SOL limit(s) are to be violated? What is the criteria and basis to R8 and R9. Note that the SOL definition has a thermal rating component in it and we are not sure how you can't draw SOLs into the same category as IROLs unless you clearly indicate these standards only apply to a subset.
No
Issue: The SDT uses a non FERC approved term of "Operational Planning Analysis", This term is in the NERC Glossary of terms. Recommend that this statement be forwarded with this Standard to FERC for approval. Issue: R2: statement "...its internal area reliability..." Should be clarified to state: R2: Each Transmission Operator shall develop a plan to operate within each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its Transmission Operators area, identified as a result of the Operational Planning Analysis performed in Requirement R1. M2: statement "...its internal area reliability..." could be clarified to state: "...has been identified by the Transmission Operator as supporting its Transmission Operators area, identified as a result of the Operational Planning Analysis..."
No
Issue: There is a great possibility of "double jeopardy" when R3 and R4 have in part the statement of "...in meeting its NERC-mandatory reliability requirements." So, an Entity could be found non compliant with R1 or R2 and also not fulfill R3 or R4. Or if an entity was found non compliant with any of the unknown "...in meeting its NERC-mandatory reliability requirements" then they would be found non compliant with this Standard. It is not clear why this Standard is being written with the statement of: "...in meeting its NERC-mandatory reliability requirements". As stated in the NERC Standard Process Manual, under Background, "NERC works with all stakeholder segments of the electric industry, including electricity users, to develop standards for the reliability planning and reliable operation of the bulk power systems. Recommend that "...in meeting its NERC-mandatory reliability requirements", be deleted and replaced with "reliable operation" as defined as "...operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance...". Or, please review IRO-010-1a, requirement 1 and use

like terminology for this Standard.
None
None
Group
Western Area Power Administration
Brandy A. Dunn
Yes
Yes
No
Data an entity specifies in requirement documents need to have some kind of reasonability limit or explanation as to what the data will be used for. As written a TOP or BA can request anything they want and other entities will be required to provide that data, even if the requested data is not available as requested. An entity can also request data not pertinent to the reliability of their system and other entities will still be required to provide it. An entity required to provide the data should have an opportunity to challenge the need for data requested. At least one BA in WECC is running a market and data provided will be used in their market, not for reliability.
TOP 1 and 2 as written are generally acceptable. TOP 3 opens doors for manipulation.
Individual
Thad Ness
American Electric Power
No
R7, R9, R10, & R11 – It needs to be clarified whether these requirements are in regards to pre-contingency monitoring or instead based on real-time flow. AEP assumes this is based on Real Time Flow, however we encourage the drafting team to provide clarifying language to make it more clear to the reader. Taken together, the combination of R7 and R9 appears redundant with R11, as meeting the objective of R7 and R9 would imply taking the proper mitigating measures. AEP suggests either eliminating both R7 and R9 or eliminating only R11. If R7 and R9 were to be eliminated, the references to magnitude and duration should be removed from R11, as the associated measure is binary in respect to the limit, i.e., either the limit has been exceeded or it has not. It would be premature for AEP to support the associated VSLs and VRFs given the objections stated above.
Yes
R2: Once again, it needs to be clarified whether this requirement is in regards to pre-contingency monitoring or instead based on real-time flow. AEP assumes this is based on Real Time Flow, however we encourage the drafting team to provide clarifying language to make it more clear to the reader.
Yes
R5: It should be noted that some of the information that could potentially be requested may already be available, for example on reliability coordinator systems. AEP suggests that the requirement be modified so that it does not unintentionally create an edict to provide “any data” to parties simply because R5 could be interpreted as allowing requests of any kind. The possibility of a dispute resolution process managed by the reliability coordinator(s) might also address these possible scenarios. Such a process should address, at a minimum, specifics such as timing, format and general logistics concerning the requested data. AEP does not currently have any text to suggest in this regard, but asks the SDT to consider such a change.
No
In general, the VRFs and VSLs are too severe and punitive. Because of this, as well as our objections with the redundancy of requirements in TOP-001-2, AEP cannot support the proposed VRFs and VSLs.
Individual
Brenda Truhe

PPL Electric Utilities
No
We believe that any definition of a Reliability Directive should require that within the communication it should be stated that "This is a Reliability Directive." to avoid any possibility of confusion.
Individual
Bill Keagle
BGE
No
BGE concurs with ISO/RTO Standards Review Committee Position: Instead of using 'its' TOP in R1 we suggest using 'a' TOP since it is possible for the listed entities to have multiple TOPs. R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? This brings us to the issue of R8. R8 is unclear. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? With the inclusion of internal area reliability in R8 and R9, aren't these requirements now in conflict with the purpose of the standard which is directed toward impacts on the reliability of the interconnection? Including IROLs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROLs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROLs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well.
No
BGE concurs with ISO/RTO Standards Review Committee Position: Even though the SDT directs us to the SOL methodology in the FAC standards which specify N-1 contingencies, R1 is not as clear in specifying N-1 contingencies as the old R6 was. We would prefer to maintain that clarity. Requiring the TOP to develop a plan to operate within each IROL in R1 is too broad. To narrow the scope of this requirement we suggest inserting the phrase 'within its TOP Area or for which it has been notified by another TOP under R3' in R1 immediately following (IROL).
No comment.
No comment.
We realize that SDT for Project 2006-06 is responsible for defining Reliability Directive; however, we would like to reiterate our position that the definition must capture the identification concept that is reflected in Requirement (R1). As a result, when Reliability Directive is used elsewhere, it would be clear that the communication must be identified as a Reliability Directive. Additionally, the currently proposed definition of Reliability Directive is also contained in COM-002-3 and IRO-001-3 which have not been approved at this time. What happens if the TOP standards are approved and the COM and IRO standards are subsequently not approved or change? The revised definition should stay with each of the 3 standards until it is in the Glossary of Terms. Since the two projects appear to be on similar timelines for stakeholder approval, we suggest that the two drafting teams (Projects 2007-03 and 2006-06) coordinate presentation of the standard revisions for NERC Board approval to occur at the same time. Likewise, NERC should file both for FERC approval concurrently. We are voting affirmatively because we support the improvements achieved by the drafting team work so far. However, we raised remaining concerns with the standard proposal on the comment form submitted on behalf of BGE. We expect the drafting team to continue to make clarifying changes until the end of this stakeholder process. The greater the clarity in the final product, the less risk of contradictory

perspectives on compliance.
Group
Constellation Energy
Brenda Powell
No
The definition of Reliability Directive is an improvement but the definition must capture the identification concept that is reflected in the Requirement (R1). As a result, when Reliability Directive is used elsewhere, it would be clear that the communication must be identified as a Reliability Directive. We suggest the following revision to the definition and it should follow through to Project 2006-06 (COM-002-3 and IRO-001-3), eventually being added to the Reliability Standards Glossary of Terms. A communication identified as a Reliability Directive by a Reliability Coordinator, Transmission Operator, or Balancing Authority to initiate action by the recipient to address an Emergency or Adverse Reliability Impact. The revised definition should stay with each of the 3 standards until it is in the Glossary of Terms. CCG, CECD and CPG agree with ISO/RTO Standards Review Committee Position: Instead of using 'its' TOP in R1 we suggest using 'a' TOP since it is possible for the listed entities to have multiple TOPs. R4 in TOP-004-1 provided a 30-minute transition from an unknown operating state to a known operating situation. Although the SDT has indicated they included provision for that transition in R7 and R9 of TOP-001-2 some flexibility is still lost. For example, if you are operating with no N-1 contingency violations and a contingency occurs, the next contingency (N-2 from the original state) could cause a violation of a Facility Rating. If this contingency actually occurs, then loading immediately exceeds the Facility Rating and you are in violation of R9. Previously, we would have had 30 minutes to work with this condition before being in violation. Additionally, R9 only applies if the SOL is identified in R8. What if it isn't identified in R8? This brings us to the issue of R8. R8 is unclear. What is meant by 'internal area reliability'? How does it differ from reliability of a TOP Area as included in R5? With the inclusion of internal area reliability in R8 and R9, aren't these requirements now in conflict with the purpose of the standard which is directed toward impacts on the reliability of the interconnection? Including IROLs in R10 and R11 introduces confusion regarding who's responsible for mitigating IROLs – the RCs or the TOPs. Therefore the SDT should give consideration to removing the references to IROLs in these requirements and defer to IRO-001-2, R7. We would suggest using 'its' RC in R6 rather than 'the' RC. Finally, why is the effective date set at 24 months following approval since there are basically no new requirements associated with this standard? Most all of the changes are primarily clarification or consolidation. This comment applies to TOP-002-3 and TOP-003-2 as well
No
CCG, CECD and CPG concur with ISO/RTO Standards Review Committee Position: Even though the SDT directs us to the SOL methodology in the FAC standards which specify N-1 contingencies, R1 is not as clear in specifying N-1 contingencies as the old R6 was. We would prefer to maintain that clarity. Requiring the TOP to develop a plan to operate within each IROL in R1 is too broad. To narrow the scope of this requirement we suggest inserting the phrase 'within its TOP Area or for which it has been notified by another TOP under R3' in R1 immediately following (IROL).
No
The Drafting Team may want to consider addressing a time period for responding to a data request to ensure parties are given time to respond. For example, a BAs data request may be driven by the TOP's data request. If a BA receives a data request for information from the TOP that sources from a GOP, the BA will need to establish a data request from the GOP that has the same deadline. If the GOP is unable to supply the data they may be non-compliant if they do not meet the deadline.
The definition of Reliability Directive is contained in COM-002-3 which has not been approved at this time. What happens if the TOP standards are approved and the COM-002-3 standard is subsequently not approved or change? Since the two projects appear to be on similar timelines for stakeholder approval, we suggest that the two drafting teams (Projects 2007-03 and 2006-06) coordinate presentation of the standard revisions for NERC Board approval to occur at the same time. Likewise, NERC should file both for FERC approval concurrently.
Individual
Kirit S. Shah

Ameren
No
<p>R2. When is "shall inform" to occur; timely, promptly, ... It would be injurious to BES reliability for the TOP to get such information, say 15 minutes or half-hour later as many other things are likely to be put in place on the assumption the directive is "ok". R3. The wording is incorrect it implies the TOP will notify the RC and its TOP's. The word other may be missing. But even with other the question it begs which other TOP's? It could be argued that the RC only needs to know Emergencies that are both actual and anticipated. They would want to know about them whether they are actual or anticipated. This direction here is not clear; it may be helpful to use two sentences to address and clarify the issues of this requirement. R4. What is meant by emergency assistance is not clear; clarify and provide examples. Is it emergency energy? Is it emergency food? Is it emergency crews? This ambiguity is a compliance nightmare as you have to prove you have everything covered that could loosely be interpreted as emergency assistance. If the SDT has an idea what they are expecting, it should be listed. If they don't have an idea of what constitutes emergency assistance, then we recommend removing it from the Requirement. R5. The Requirement should be re-written to say "Each TOP shall inform only if it adversely affects others its RC and other TOP's (Which other TOP's? This direction here is not clear; clarify) of its operations known or expected to result in an Adverse Reliability Impact ..." R6. What is meant by negatively impacting is not clear; clarify and provide examples. For example, using the words as listed, economic impact might be a consideration. The Standard should not be setting up a condition where TOPs tell GO/GOPs that they might suffer economic harm as a result of one of the communication channels being down. As currently worded this might lead to a civil issue instead of a BES reliability issue. R8. There are SOLs that are developed in real-time (as evidenced by the multi-time-horizon assigned). It might be possible for such an SOL to develop and have to be resolved for local area reliability only, before the RC could be notified. This Requirement should insert the word planned before SOL. Alternatively, insert where time permits in place of real-time. R9. What is meant by continuous duration is not clear; clarify. Is it 5 minutes, 15 minutes, an hour, a day? Anything more than 5 minutes is likely to be in the thermal time-constant period where rating could be affected. We feel that the real intent of this requirement is that TOPs resolve SOLs. It is not so much how long, as it is that they are not purposely delaying the resolution. The Requirement should be re-written to say "The TOP's will resolve as soon as possible any SOL..... with no intentional time delay..." R10. The Requirement as written should be prefaced with "when time permits, each Transmission Operator....." The idea of time permitting is alluded to in R5, "unless conditions do not permit such communications".</p>
No
<p>R1. The current language invites a retrospective assessment and a potential compliance issue that if a bad event occurs that was not in the forecast, it may call into question whether the TOP adequately "allowed it to assess" whether operations were within limits. We recommend SDT re-write the requirement: "Each TOP shall have an Operational Planning Analysis that represents projected System conditions for the next day, within its Transmission Operator Area, to identify any projected exceedance of its Facility Ratings or Stability Limits during anticipated normal and Contingency event conditions." R2. Although the time-horizon assignment provides some cover for real-time SOLs, it would be preferable to add direct clarification to the Requirement as follows. "Each TOP shall develop a next day plan to operate within each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) ..." R3. Taken literally, this Requirement could require TOP notification to a GOP/PSE/LSE that they will be dispatched down in real-time for a projected congestion issue (SOL). This does not make sense and certainly not in organized LMP markets where they would have advance knowledge of market conditions AND FOR THINGS THAT ARE ROUTINE. This is the nexus of the problem for us with this Requirement. The need to notify others of their roles should be restricted to unusual actions in the case of SOL resolution. Arguably this could be true for IROLs too but given the impact perhaps it could remain. We suggest that the Requirement say, "Each Transmission Operator shall notify all NERC registered entities identified in the plan(s) cited in Requirement R2 as to their role in those plan(s) when those actions are unusual or abnormal actions." OR "Each Transmission Operator shall notify all NERC registered entities identified in the plan(s) cited in Requirement R2 as to their role in those plan(s) for the resolution of IROLs or when those actions are unusual or abnormal actions for the resolution of SOLs."</p>
No
R1. Each TOP shall create a documented specification for the data necessary for it to perform its

required Operational Planning Analyses and Real-time monitoring. The specification shall include: 1.2. What is meant by mutually agreeable is not clear it implies more than one party, yet this Requirement only applies to one party the TOP. This is illogical and needs to be clarified or removed. 1.4. Strike the deadline and consider using time frame or duration by which the respondent is to provide the indicated data. R2. Each BA shall create a documented specification for the data necessary for it to perform its required Real-time monitoring. The specification shall include: 2.2. What is meant by mutually agreeable is not clear it implies more than one party, yet this Requirement only applies to one party the BA. This is illogical and needs to be clarified or removed. 2.4. Strike the deadline and consider using time frame or duration by which the respondent is to provide the indicated data. R3. After the first instance of specification; state from which requirement; if you were intending R1, then for clarity insert "from R1" There is potentially another compliance issue present; what is meant by NERC-mandated reliability requirements is not clear nor does not match the wording in R1. If the meaning/intent is that NERC-mandated reliability requirements is in fact Operational Planning Analysis and Real-time monitoring, then use those words. If the SDT has other things that the data specification is to be distributed for, then they should be spelled out explicitly here and likely in R1 as well. R4. After the first instance of specification; state from which requirement; if you were intending R1, then for clarity insert "from R1" There is potentially another compliance issue present; what is meant by NERC-mandated reliability requirements is not clear nor does not match the wording in R1. If the meaning/intent is that NERC-mandated reliability requirements is in fact Operational Planning Analysis and Real-time monitoring, then use those words. If the SDT has other things that the data specification is to be distributed for, then they should be spelled out explicitly here and likely in R1 as well. R5. We recommend re-writing: "Each TOP, BA, GO, GOP, IA, LSE, and TO receiving a data specification in Requirement R3 or R4 shall provide the data associated with said data specification. "

No

See comments in question 5 regarding VRF.

We highly recommend that you do not lump requirements that include SOL with IROL. IROLs by definition should have VRFs higher than SOL. So it is not possible to properly assign the VRF consistent with the NERC VRF/VSL Guideline documents. We would suggest that the SDT could review what the FAC-003 SDT has done and then provide separate Requirements when there are known and expected VRF differences for different elements covered by a combined Requirement.

Group

ACES Power Marketing Member Standards Collaborators

Jason Marshall

No

We largely agree with the changes but have identified the following specific issues. We disagree with removing Bulk Electric System (BES) from the purpose of the standard. NERC compliance staff has interpreted standards as applying to the Bulk Power System (BPS) if they are not specifically limited to the BES. More specifically in response to comments that CAN-0016 impermissibly extended the standard to the BPS, NERC responded that Section 39 of the EAct of 2005 requires standards to apply to the BPS unless the standard restricts itself. Because the BPS can be interpreted to be broader than the BES and there is no need for the standard to apply broader than the BES, we would like to see BES inserted back into the purpose statement. Substituting BES for "interconnection" in the purpose statement may solve this issue. While the title contained in the header was changed to "Transmission Operations" the actual title was not changed. They should match. For simplicity, we recommend striking "known or expected to be" from Requirement R3. As it is written now, it is more confusing. First, the TOP, can only notify other TOPs that it knows are affected. Second, the use of "expected" implies that something different is meant than known. If so, what is the intention of the meaning and whose expectation is it: the responsible TOP, the other TOP, the auditor or some other entity? There is a similar issue regarding "known or expected to result in an Adverse Reliability Impact" in Requirement R5. We recommend striking "or expected" for simplicity and to avoid the confusion of whose expectation it is. In Requirement R8, "while not IROLs" should be "while not an IROL". We agree with removing the 30 minute limit in Requirements R9 and R11 and basing the time limit upon the Facility Rating or Stability criteria. In Requirement R10, striking "each" before SOL would improve the clarity of the requirement. In Measurement M1, "nless" should be unless. This may already be correct. The red-lines show "nless" and the clean document shows "unless". What is the intended difference between Transmission Operator Area in Requirement R5 and internal area in

Requirement R8? Should they be the same and if not why not?
No
We largely agree with the changes but have identified the following specific issues. We believe that purpose statement should clearly state that the standard is limited to the Bulk Electric System (BES). NERC compliance staff has interpreted standards as applying to the Bulk Power System (BPS) if they are not specifically limited to the BES. More specifically in response to comments that CAN-0016 impermissibly extended the standard to the BPS, NERC responded that Section 39 of the EAct of 2005 requires standards to apply to the BPS unless the standard restricts itself. Because the BPS can be interpreted to be broader than the BES and there is no need for the standard to apply broader than the BES, we would like to see BES inserted into the purpose statement. For Requirement R1, it is not clear why focus is on Facility Ratings and Stability Limits rather than SOLs. We suggest using the term SOL instead.
No
We largely agree with the changes but have identified the following specific issues. We believe that purpose statement should clearly state that the standard is limited to the Bulk Electric System (BES). NERC compliance staff has interpreted standards as applying to the Bulk Power System (BPS) if they are not specifically limited to the BES. More specifically in response to comments that CAN-0016 impermissibly extended the standard to the BPS, NERC responded that Section 39 of the EAct of 2005 requires standards to apply to the BPS unless the standard restricts itself. Because the BPS can be interpreted to be broader than the BES and there is no need for the standard to apply broader than the BES, we would like to see BES inserted back into the purpose statement. Because of the difficulties experienced by some entities in receiving the RC data specification in IRO-010-1a, we recommend that the implementation of TOP-003-2 Requirement R5 occur a couple of months after the implementation in TOP-003-2 Requirements R1-R4. IRO-010-1a is a parallel standard to TOP-003-2 and the effective date of the distribution of the RC data specification was simultaneous to the effective date of the requirement for the recipients to comply with the data specification. This meant that the RC could provide the data specification on the same date that the recipients had to meet the data specification. Unfortunately, there were some entities expecting to receive the data specification that did not and were concerned about a potential non-compliance. What if an auditor determined the RC should have provided the data specification? Would the entity that expected to receive the data specification be held responsible? By staggering the effective date of Requirement R5, this confusion can be avoided.
No
The VSLs for TOP-002-3 Requirements R1 and R2 could have more levels based on the number of days for which there is not a plan or Operational Planning Analysis.
Group
City Water Light and Power (CWLP) - Springfield - IL
Shaun Anders
No
R8 requirement to identify "...SOLs which...have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis" is vague and difficult to measure. "Internal area reliability" could conceivable include all SOLs CWLP echoes SERC Operating Committee comments submitted separately: "We suggest that the definition of Reliability Directive should be modified 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 "an event that results in Bulk Electric System instability or Cascading". We also recommend that the Standard Drafting Team coordinate with the COM-002-3 Standard Drafting Team to ensure consistency in the Reliability Directive definition."
No
R1 should utilize SOL and IROL criteria as opposed to Facility Ratings and Stability Limits criteria for consistency and clarity R1 Rationale language lacks clarity. Poor definition of "process", "tools", and "procedures" could be construed to indicate that a TO must be able to perform analysis internally even when basic non-automated "tools" such as offline power flow software are not available. The intent of "tool" is unclear in general for this instance. If the intent is to capture the use of online

automated tools such a Real-Time Contingency Analysis and ensure that offline analysis capabilities are retained, the language should explicitly include "online automated tools" or "real-time automated tools"
No
R1 and R2 require specifications for data exchange which do not account for the ability of the respondent to meet the specification. As written, the requirement could force a respondent to continue to provide data with such a format, periodicity, or deadline that would be an undue burden to the respondent. All requirements should explicitly stress a mutually agreed plan and R1.1/R2.1 should refer to classes or types of as a qualifier. Likewise, R5 should explicitly state that respondents shall satisfy the obligations within the context of a mutually agreed specification.
Individual
Jason Snodgrass
GTC
No
M4 is misreferencing R2 and R4 and should be corrected as follows:"receiving a data specification in Requirement R3 or R4 shall make available evidence that it has satisfied the obligations of the documented specifications for data in accordance with Requirement R5."
Demonstrating providing all data specifications for real time operations horizon is very prescriptive in nature and could have unanticipated "compliance documentation" consequences when data or the transfer method is unavailable (e.g., when an RTU goes down).

Please see the attached for additional comments received.



Submitted on behalf of Southern Company

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: **We suggest the Standard Drafting Team further clarify or define the term "supporting internal area reliability". It is unclear what is meant by this phrase. The standards need to be very clear so as to aid in demonstrating compliance and to show how they enhance reliability.**

It is unclear whether this standard applies to "next-day" only or if it includes current day / real time assessments as well. We have the following suggestions to add current day / real time, which enhance reliability, and to clarify the standard:

- **We suggest including "Real-time Assessments" in this standard to clarify Operations Planning and same day operations time horizons (Requirement 8).**
- **We request that the drafting team review and explain the difference in the time horizons for Requirements 3, 5 and 8.**

2. 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: **We understand the flexibility that the SDT is attempting to allow in the Requirement, however, in order to reduce confusion and ambiguity which may result in a CAN, and to avoid potential Standards of Conduct issues, we recommend that the term 'all NERC registered entities' be replaced with the operating entities, Transmission Operator, Generator Operator and Load Serving Entity.**

3. 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: **The applicability of the VSL for R1 and R2 is unclear - is the VSL applicable to the TOP/BA requesting the data or is it applicable to the TOP/BA providing the data? If it applies to the TOP/BA requesting the data we would suggest that the SDT be consistent with the VSLs in IRO-10-1a.**

4. 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: **See the responses to question 3 above**

5. 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: **Data retention requirements for TOP-001-2, TOP-002-3 and TOP-003-2 need to align with the expectations of the compliance entity. For instance, the data retention requirements indicate 1 year in some cases and in some cases, the compliance enforcement entities expect to be able to review evidence back to the previous audit.**