

- Individual or group. (39 Responses)**
- Name (23 Responses)**
- Organization (23 Responses)**
- Group Name (16 Responses)**
- Lead Contact (16 Responses)**
- Question 1 (38 Responses)**
- Question 1 Comments (39 Responses)**
- Question 2 (34 Responses)**
- Question 2 Comments (39 Responses)**
- Question 3 (33 Responses)**
- Question 3 Comments (39 Responses)**
- Question 4 (0 Responses)**
- Question 4 Comments (39 Responses)**
- Question 5 (24 Responses)**
- Question 5 Comments (39 Responses)**
- Question 6 (0 Responses)**
- Question 6 Comments (39 Responses)**

Individual
Joe Couturier
SSOE Group
No
TOP-001-2 Grammatical: R8 and its supporting rationale refers to a term SOL. The term is 'defined' later in R9. The 'definition' should probably be defined at the time of its first usage. R11 The TO directs someone to do something. However, who is directed is not defined. Is it directed to the RC?
Group
Northeast Power Coordinating Council
Guy Zito
No
It is written in FAC-014-2 R5.2: R5.2. 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. This already mandates that the Transmission Operator provide its Reliability Coordinator SOLs. This requirement and TOP-001 R8 must be made to agree. As explained in the redline version of TOP-001: "Rationale: The class of SOL included in Requirements R8, R9, and R11 was created in response to industry comments that there were SOLs that deserved increased attention. Examples of such SOLs include WECC Path SOLs, SOLs on transmission facilities maintaining service to significant events or buildings, such as the stadium for major nationally televised events, prominent government buildings, and military installations." It is understood that the impacts of some SOLs may attract increased attention because of the operational implications of them being exceeded. It must also be realized that every SOL has a reliability impact. The added wording adds unneeded complication to the Requirement. Will the proposed requirement create a new class of SOLs that might include any that might be "intermittent" in nature, such as those occurring during televised events, etc.? This becomes a moving target, and it may become problematic for keeping track of those SOLs to which these requirements apply, i.e., those that require notification to the Reliability Coordinator, versus those which don't. Regardless, operator responses to any SOL's on their systems should be the same in terms of swiftness and a sense of urgency. The phrase "supporting reliability internal" is used in R8. What constitutes "supporting reliability internal"? This may present compliance issues. Experience has shown that the use of the terms internal, external, local, wide area have presented auditing difficulties that generated documentation issues.

TOP-001 uses the term "Reliability Directive" which is dependent on a definition developed in Project 2006-06 Reliability Coordination. Because of the development of this definition in both Projects, NERC should post these projects simultaneously to gain industry support to move these projects forward.
Group
PNGC Group Comments
Ron Sporseen
No
Comments: The PNGC comment group believes there should be a distinction in the "Applicability" section of the standard distinguishing between "Scheduling DP/LSE" and "Non-scheduling DP/LSE". PNGC members are small rural cooperatives that are "Full service BPA customers." This means is that BPA is our power supplier and scheduling agent and therefore handles all scheduling, tagging, dispatching of resources and curtailments of load from breakers on BPA's system for PNGC members. According to a letter from the WECC Reliability Coordinator (VRCC and LRCC) none of PNGC's members will ever receive a "Reliability Directive". Such a Directive would be sent to either a Balancing Authority (BA), or a Transmission Operator (TOP). In fact, the Bonneville Power Administration (BPA) is the BA and TOP for many of our members so R1 and R2 are nothing more than a clerical exercise for many DP/LSE entities. We estimate there are over 100 entities that are BPA Full Service customers that are in a similar position and making this standard applicable to them does nothing to enhance reliability. A simple declarative statement in the Applicability section of the standard could focus the intent of the SDT on those entities that need it while lessening the compliance risk and clerical burden for other entities that the standard should not apply to. We suggest: 4. Applicability 4.1 Balancing Authority 4.2 Transmission Operator 4.3 Generator Operator 4.4 Distribution Provider: With Real-time Operations desk 4.5 Load-Serving Entity: With Real-time Operations desk
No
Comments: In addition to the same Applicability argument we made in Question 1 for TOP-001-2, the PNGC comment group has a couple of minor issues with TOP-003-2: 1. We question the Violation Risk Factor (VRF) of "Medium" for R5. R1-4 have VRFs of "Low" so the "Medium" designation for R5 seems unwarranted. If the SDT views the failure of TOPs and BAs to distribute data requests to other entities in an agreeable format as a "Low" risk, then the failure of those other entities to respond to issued data requests should also be a "Low" risk. We believe R1-5 should all have a "Low" VRF. 2. R1 and R2 require the BA and TOP create a documented specification for data needed to perform analysis functions and Real-time monitoring. We question R1.2 and R2.2: "A mutually agreeable format." There absolutely should be a mutually agreeable format for the data but the standard doesn't define how that is to be accomplished. It seems to us that the TOP and BA will just issue the directive without consultation and that violation of R1.2 and R2.2 by the TOP or BA is unenforceable. We suggest expanding M1 and M2 to include acknowledgement by entities that are the subject of requests. The acknowledgment should include that the request was received and the data format is agreed to.
This question is a duplicate of Question 2. If question 2 refers to TOP-002-3 then our comments from Question 2 should be in this spot. We have no comments for TOP-002-3.
No
Please see our response to Question 2.
none
Individual
Michael Falvo
Independent Electricity System Operator
Yes

Yes
Yes
Yes
In the Violation Severity Levels section of the standards, items that contain "whichever is less" following the "or" statement, may be difficult to interpret. As a suggestion, this could be addressed by improving the wording, providing examples or categorizing non-compliance as a percentage only (rather than a number "or" percentage, whichever is less)
The proposed effective dates for the TOP-002-3, TOP-003-2 and PRC-001-2 standards conflict with Ontario regulatory practice respecting the effective date of implementing approved standards. It is suggested that this conflict be removed by appending to each of the sentences in Section A5 of both standards, after "following applicable regulatory approval", to the following effect: ", or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities." The places for the insertion are: TOP-002-3, Section A5, end of second sentence TOP-003-2, Section A5, end of second sentence. PRC-001-2, Section A5, end of second sentence.
Group
Southwest Power Pool Regional Entity
Emily Pennel
Yes
Yes
No
SPP RE does not believe TOP-003-2 addresses the requirements in PRC-001.
SPP RE does not believe TOP-003-2 addresses the requirements in PRC-001.
Group
Imperial Irrigation District (IID)
Jesus Sammy Alcaraz
Yes
Yes
Yes
Yes
Yes
Group
Dominion
Connie Lowe
Yes
Yes
TOP-002-3 M2 should be updated to reflect the changes made in R2 (as suggested below). M2. Each Transmission Operator shall 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 reliability internal to its Transmission Operator Area, identified as a result of the Operational Planning Analysis performed in Requirement R1 in accordance with Requirement R2. Such evidence could include but it is not limited to plans for precluding operating in excess of each IROL and each SOL which, while not an IROL, was identified as a result of the Operational Planning Analysis. VSLs R2 (page 5 redline version) Severe Column should be updated to reflect the changes made in R2 (as suggested below). The Transmission Operator did not develop a plan to operate within those IROLs and each SOL which, while not an IROL, has been identified by the Transmission Operator as supporting reliability internal to its Transmission Operator Area, identified as a result of the Operational Planning Analysis performed in Requirement R1.

Yes

Agree with changes made.

Yes

Implementation Plan – Project 2007-03 Real-time Operations; on pages 1 and 2, instances where TOP-003-1 is mentioned it should read as TOP-003-2.

Individual

Andrew Gallo

City of Austin dba Austin Energy

Yes

Yes

TOP-002-3, R1 TOP-002-3, R1 states "Each Transmission Operator shall have an Operational Planning Analysis ..." and the mapping document says that this requirement "is patterned after the approved IRO-008-1, Requirement R1 for the Reliability Coordinator." As such, Austin Energy suggests that the language in TOP-002-3, R1 be changed from "... shall have an Operational Planning Analysis ..." to "... shall perform an Operational Planning Analysis" This language matches IRO-008-1, R1 and better aligns with Measure 1 for TOP-002-3.

Yes

We agree.

Yes

The VSL for TOP-001-2, R8 includes instruction to "start with the Severe VSL first and then to work your way to the left until you find the situation that fits." It explains that the goal is to assign a Severe VSL to a small entity who has just one affected reliability entity to inform and fails to do so. This structure usually makes sense; however, it is not applicable to R8. R8 requires the TOP to inform its RC of SOLs that have been identified as supporting reliability. The variability in the requirement is in the number of SOLs identified not in the number of registered entities to inform. The intent of being non-discriminatory by size of entity is already covered with regards to the number of SOLs identified because the VSL uses the "# SOLs or % of SOLs, whichever is less" approach, and the instruction becomes unnecessary. Austin Energy recommends that the SDT remove the instruction statement above R8.

None.

Individual

Daniel Duff

Liberty Electric Power LLC

Yes

Yes

No

Multiple entities commented in the prior round that the standard would expose RE's to violation space in the event of a communications failure. Although the SDT stated in the consideration of comments that "It is not the intent of the SDT that TOP-003-2 penalizes entities for communication errors. The intent is to have the data communications established.", the plain language of the standard is in conflict with this position. The standard as written states a RE "shall satisfy the obligations of the documented specifications for data." Among the specifications of real time data requests are the periodicity of the submission. For example, PJM in Manual 14D, Generator Operational Requirements, states "All data items, regardless of type, are collected and disseminated at the same 2-second rate. Instantaneous MW and MVAR information is collected on the same data scan as Integrated MWh and MVARh." If a RE has a loss of their RTU, they will have failed to "satisfy the obligations of the documented specifications for data", and be exposed to a potential violation. If the intent of the SDT is as stated in the previous consideration of comments, there must be some language to that effect added to the standard. In R1, adding a bullet 1.21 "an alternative format for use in the event of interruption of the mutually agreed format" would close the hole in the language as written and satisfy the stated objections.

Yes. Thank you to the SDT for removing these requirements.

No

As written data transmission failures subject REs to a severe violation in R5, see Q3 response.

Individual

Michelle D'Antuono

Ingleside Cogeneration LP

Yes

As a GO/GOP, Ingleside Cogeneration LP is subject only to TOP-001-2 R1 and R2, related to compliance with a Reliability Directive. We believe 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. Furthermore, we agree with the language added to the corresponding Measures (M1 and M2) specifically allowing an attestation to be supplied to a CEA if a Reliability Directive was not received during the compliance time frame.

Yes

Yes

We are encouraged that the SDT has added a statement in M3 and M4 calling for those TOPs and BAs who post their data specifications to also electronically notify the downstream data suppliers. This is a good first step in the use of a web-based data collection process – which we hope will replace the spreadsheet-based process mostly in place today. A goal of such a system must be to consolidate all operational data requirements into a single template, so that data suppliers are not subject to redundant criteria.

Ingleside Cogeneration LP agrees that relay and equipment status can be included in a telemetry specification as part of TOP-003-2 – which is redundant with PRC-001-1 R2 and R6. Similarly, the coordination of changes in generation operating conditions such as de-ratings that could require changes in the TOP's Protection System (R5) can be captured in existing data submission vehicles that TOP-003-2 will also cover.

Yes

Individual

Rich Salgo

NV Energy

Yes

Yes

Yes
We see no problem with what was changed in this posting; however, please note issues raised related to TOP-003-2 in the comment submitted on Question 6.
No, we believe there may be reliability gaps introduced with the specific deletion of old R2 from PRC-001. We are concerned that the open-ended specification of required data per proposed TOP-003 R1 may not adequately cover the notification of status and conditions for certain protection systems and SPS. With the requirement R2 in place, there is no doubt about the need to make notification of these sorts of losses or status changes. Absent the requirement, it is likely that inconsistent specifications for such information by TOP's or BA's will result.
No
PRC-001 R1: Though this requirement does not appear to be within the scope of the SDT's efforts in this project, we note that for R1 (familiarity of purpose and limitations of protection systems), there is no Measure in the Standard, and the VSL's appear to be quite subjective. I would like to make a specific suggestion, but cannot do so without knowing what sort of Measures are intended for this requirement. Perhaps, change the VSL language to state "Entity does not possess documentation describing purpose/limitations of its protection systems for its Operator personnel."
TOP-003-2 R1-5 1)We appreciate the work of the SDT to allow discretion in the creation of data and information specifications to provide for reliable operation; however, we believe that the open-ended requirements do not provide sufficient clarity about what is expected. This entity is a BA/TOP as well as a GOP, GO, TO, etc. As such, is it the intent of these requirements that we would have to issue a specification to ourselves for the data and information that we are to provide to ourselves? If so, how is this expected to take form? We could envision a document that lists the SCADA RTU points required from every BES station in the footprint, which calls into question what happens when an inevitable SCADA interruption occurs. Is the entity in violation of R5 because for a short period of time it did not satisfy its obligations to provide data under the specification? 2) Or, is it the intent of the SDT that such specifications are issued to "external" entities, such as interconnecting Generators, TOP's within the BA footprint, etc.? 3) On the surface, the open-ended fill-in-the-blank specification requirement seems like a good idea; however, at closer evaluation, we believe it will lead to great inconsistencies without some additional guidance on what needs to be included in the specifications and to whom the specifications should apply.
Group
Progress Energy
Jim Eckelkamp
Yes
: Progress Energy requests the removal of the word "identified" in association with Reliability Directive in all Requirements and Measures. Communications between Transmission Operators and other functional entities already require 3-part communications; having to state 'This is a Reliability Directive' to each entity and receive confirmation of that back from each entity, especially across a fleet of Generator Operators and LSEs, could add unnecessary time before action is taken. Entities should always assume that each directive being given to them is a Reliability Directive and respond accordingly. R1 would read "and Load-Serving Entity shall comply with each Reliability Directive issued by its Transmission Operator...".
Yes
Please change the R2 VSL from "supporting its internal area reliability" to "supporting reliability internal to its Transmission Operator Area...".
Yes
Individual
Joe Petaski
Manitoba Hydro
No

Manitoba Hydro is voting negative on TOP-001-2 for the following reason: R8 and R9 - In the absence of the rationale box in the final approved version of the standard, R8 is extremely unclear. All SOL's support reliability based on an assessment of operational planning. The requirement (R9) 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. The term continuous duration is undefined and as such makes the standard subject to interpretation. It would appear that the standard expects the system operator to do something more than would be done for an IROL.

Yes

Section 1.3 Data Retention - For consistency with TOP-001-2, the retention period for voice recordings in TOP-002-3 should be changed from 3 months to 'ninety calendar days'.

Yes

R2.1 - For consistency with R2 and completeness, 'analysis functions' should be added to R2.1. Suggested wording: 'A list of data and information needed by the Balancing Authority to support its analysis functions and Real-time monitoring'.

Section 1.4 Compliance Monitoring and Assessment Processes - Section 1.4 should be removed as it is identical to Section 1.2 'Compliance Monitoring and Reset Time Frame'.

Yes

No additional comments.

Individual

Andrew Z. Pusztai

American transmission Company

Yes

Yes

No

Requirement R3 and R4 should specify which entities are required to respond to data requests. For example, a TOP in Indiana who sends a request to a TOP in Wisconsin; should the TOP in Wisconsin be required to respond. ATC recommends that the term "contiguous entity" be referenced and added to the requirements. +

ATC agrees with removing R6 from PRC-001, however ATC does not believe it is appropriately addressed in TOP-003-2. If the intent is to have SPS data as a part of a data specification, it should be stated in the requirements of TOP-003-2.

Group

MRO NSRF

WILL SMITH

No

For R9, the drafting team did not address "continuous duration". Many entities had commented that the term is vague. Is continuous duration, 8 hours or 15 minutes? For IROL limit violations or Unknown State conditions, the entity has 30 minutes to mitigate the situation.

Yes

No

Requirement R3, and R4 must specify which entities are required to respond to data requests. For example should a TOP in Indiana send a request to a TOP in Wisconsin, must it be complied with. Suggest a, "contiguous entity" reference. Requirements R1 and R3 are very vague and need to add more specificity similar to that from existing standard TOP-005 which includes specific guidelines.

The NSRF agrees with removing R6 from PRC-001, however we do not feel it is appropriately addressed in TOP-003-2. If the intent is to have SPS data as a part of a data specification, it should be stated in the requirements of TOP-003-2.

No

TOP-001-2 The adding the language of "or 5% or less of the affected Transmission Operators, whichever is less", "or more than 5% or less than or equal to 10% of the affected Transmission Operators, whichever is less", "or more than 10% or less than or equal to 15% of the affected Transmission Operators, whichever is less", " or more than 15% of the affected Transmission Operators, whichever is less" to R3, R5, and R6 is confusing and not necessary. For example: 10 affected TOs. The lower VSL states: The TO did not inform one other TO or 5% or less of the affected TOs, whichever is less. 5% of 10 is .5 TOs which is less than 1. The percentage language should be removed. TOP-003-2 – Same issue with VSLs as with TOP-001-2. The percentage language should be removed from R3 and R4. PRC-001-2 – R1 VSL for High and Severe seem arbitrary. Not knowing limitations are not as bad as not knowing purpose? Suggest either breakdown by number of systems. Ie: did not know purpose and limitations of 1 protection scheme, etc. Or Binary. Severe – did not know purpose and limitation of protections systems in its area.

Individual

Greg Rowland

Duke Energy

No

While the drafting team has made several improvements to this standard, we believe these additional changes are needed:

- The definition of Reliability Directive includes the defined term "Adverse Reliability Impact", which should be replaced by the actual wording of latest (8/4/2011) BOT-approved definition of "Adverse Reliability Impact", since it has NOT yet been approved by FERC.
- R3 places the responsibility on a Transmission Operator to possess tools it does not currently utilize. Most companies will study their own area and possibly one or two busses out. In order to be compliant to this standard, it would appear a Transmission Operator would need to possess study tools which are currently utilized by the Reliability Coordinator. Suggest considering adopting language where the Transmission Operator requests assistance in identifying impacts outside their direct interconnects. Suggested rewording: "Each Transmission Operator shall work in conjunction with its respective Reliability Coordinator to inform other Transmission Operator(s) that are known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis. [Violation Risk Factor: High] [Time Horizon: Operations Planning,]".
- R4, as written, does not consider an entity that might be under the control of an RTO. A Transmission Operator, as a member of an RTO, cannot take actions without the permission unless during an emergency where cascading outages, loss of equipment etc. is involved. If the event described in R4 as currently written is not an immediate emergency, the Transmission Operator would need to gain permission of the RTO to comply. Suggest wording changes to take into consideration entities whose facilities are under RTO control. Suggested rewording: "Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, provided that appropriate agreements are in place, and the requesting entity has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, regulatory, or statutory requirements. In the event the Transmission Operator is under the purview of a Regional Transmission Organization (RTO), the Reliability Coordinator of the RTO shall work with its Transmission Operators in requesting available emergency assistance. [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]".
- R5 – Similar comment to R3. This requirement places the responsibility on a Transmission Operator to possess tools it does not currently utilize. Most companies will study their own area and possibly one or two busses out. In order to be compliant to this standard, it would appear a Transmission Operator would need to possess study tools which are currently utilized by the Reliability Coordinator. Suggest considering adopting language where the Transmission Operator requests assistance in identifying impacts outside their direct interconnects. Suggested rewording: "Each Transmission Operator shall inform its Reliability Coordinator, who shall assist in identifying other Transmission Operators of its operations that are known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas unless conditions do not permit such communications. Examples of such operations include but are not

limited to relay or equipment failures, and changes in generation, Transmission, or Load. [Violation Risk Factor: High] [Time Horizon: Same-day Operations, Real-Time Operations]". • R6 – Strike the word "negatively", since no one will be "positively" impacted. • R6 needs to be clarified as to the intent. Does registered entity mean the corporation, or does registered entity mean a TO, BA etc. Suggestion would be to remove NERC registered from the language. • R8 – The SDT has included a Rationale for SOLs that deserve increased attention. Several examples cited in the Rationale are for service to local load, and while the local loads may be important loads, the associated SOLs would have no impact on BES reliability. R8 requires the TOP to inform the RC of such SOLs, and we question why the RC needs to be informed of SOLs that only impact service to local loads. 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". With no clarification, it is conceivable that every SOL on a TOP's system could be considered to support its "internal area reliability". Communicating all SOLs would inundate the RC with unneeded information, which we believe would be detrimental to reliability. If this requirement stays in the standard, it needs to be reworded to indicate that any SOLs identified are identified at the sole discretion of the TOP. • R8 - Change the phrase "as supporting" to "in support of". • R9 – Strike the word "would" and add an "s" to "cause".

No

• 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. Also, change the phrase "as supporting" to "in support of".

Yes

Yes

No

• TOP-001-2 VSLs should be revised consistent with our comments on the requirements. • TOP-003-2 VSLs have explanatory language on how the SDT intends the VSLs to be used. This language needs to be incorporated into the VSLs more directly, because compliance personnel will not be bound by the SDT's intent.

Group

Arizona Public Service Company

Janet Smith, Regulatory Affairs Supervisor

Yes

Yes

Yes

Yes, we agree with the changes the drafting team has made.

Yes

none

Individual

Keira Kazmerski

Xcel Energy

No

R8 – Please clarify the difference between R8 of TOP-001-2, and R2 & R5 of FAC-014-2. We would expect in some regions, depending on the RC's SOL methodology, that this would be the same information. For example, in SPP, all Facility Ratings are considered SOLs. Compliance with R9 of TOP-001-2 will prove quite difficult in regions like this. Please clarify the what the drafting team envisions being the difference between these two standards, and what is expected to be given to the

RC under each. 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?

Yes

Yes

Group

Southern Company

Antonio Grayson`

Yes

R3. The requirement is worded such that it implies that the Transmission Operator has a Transmission Operator. We suggest adding the word "other" so that it reads "shall inform its Reliability Coordinator and other Transmission Operator(s)...." R5. We recommend the following word changes: Each Transmission Operator shall inform its Reliability Coordinator and other Transmission Operators of its operations that are known or expected to result in an Adverse Reliability Impact on those their respective Transmission Operator Areas unless conditions do not permit such communications. Examples of such operations may include are relay or equipment failures, and changes in generation, Transmission, or Load.

No

R3- Southern understands the intent of this requirement is to notify all registered entities that may be affected by a mitigation plan for the next day so they can be prepared to respond. However, in some cases like the one shown in the example below, it is unreasonable to expect the TOP to notify every GOP that could be re-dispatched. Requiring this would actually put the system at risk as the TOP would be focused on notifying GOPs inside its TOP area and potentially outside its TOP area and not focused on operating the system. Southern suggests that the requirement be changed to state that the TOP will notify "other TOP's and associated RC(s) associated with actions in the plan(s)" in a similar manner that other TOPs and RCs are notified in the proposed TOP-001-2, R3 and R5. If that is unacceptable to the SDT then it is suggested at a minimum that "all NERC registered entities" be clarified with the addition of the word "explicitly" just prior to "identified in the plan(s)". Example: An SOL is identified in the Operational Analysis for the next day from R2. The plan to mitigate this SOL is to call an IDC-TLR. The level of the TLR may or may not reach level 5. If the TLR reaches level 5 many generators will be required to be re-dispatched inside and outside of the TOPs area. This requirement will require the Transmission Operator to notify every Generator Operator that could possibly be re-dispatched for a TLR-5. Another concern with having the TOP notify all entities (which would include those outside their area) is the added FERC Standards of Conduct risk that the NERC standard is forcing the TOP to assume. For example, notification may go to a GOP which also performs market functions about which the TOP is unaware. In communicating the plan to the GOP, the TOP may inadvertently communicate non-public transmission information in violation of the Standards of Conduct. If communications is limited to external entities that are TOP and RC, this risk is eliminated and the communication to the GOP will take place by its native TOP - which should be familiar with any Standards of Conduct restrictions on communication to the GOP.

Yes

Yes, we agree with the SDT's suggestion
Yes
Individual
Larry Raczkowski
FirstEnergy Corp
Yes
Yes
Yes
FE agrees with the changes that have been made by the drafting team.
Yes
FE appreciates the hard work of the drafting team and for addressing our concerns from the previous ballot.
Individual
Terry Harbour
MidAmerican Energy
No
NERC standards cannot be vague and undefined or NERC interprets the standard and creates new requirements through the Compliance Application Notice process. The rational specified for R8 shows that R8 deals with a Transmission Operator defined special subset of SOLs. However, the current wording in R8 does not use the wording "special subset of SOLs as defined by the TOP". The standard uses "as supporting reliability internal to its Transmission Operator Area based on its assessment of its Operational Planning Analysis". This is not clear enough for a black and white compliance audit and therefore is inadequate. Further in R9 continous duration remains undefined. Therefore, specific wording needs to be added to show that R9 applies to the "special subset of SOLs with there corresponding continous duration timeframes as defined by the TOP" Last, the the same wording and definition must be applied to FAC-011-2 R2 to remain consistent and clear.
No
TOP-002 R2 uses the same vague language as TOP-001 R8. The wording "special subset of SOLs as defined by the TOP" needs to be added. Otherwise NERC and regional auditors will apply the wording broadly when the intent was for a specific subset of SOLs defined by the TOP. Also see the NSRF comments
No
See the NSRF comments
Yes - retire the three requiements in PRC-001
No
See the NSRF comments
Group
Idaho Power Company
Molly Devine
No
I don't think that this requirement should be retained. With e-tag requirements, mid-hour scheduling and the ability to process an emergency tag at any time it seems like an interchange. What is emergency assistance?
Yes

I agree with the direction of the project. Consolidating all the TOP standards and eliminating the redundancy will make it much easier.
No
TOP-003 will require that we create a list of data necessary to complete our operational planning analysis. Currently I don't think we have a good process for doing analysis so defining the data required may be difficult.
Yes
Group
Luminant
Brenda Hampton
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.
Individual
Texas Reliability Entity
Texas Reliability Entity
No
1) Definitions: Texas RE does not agree with the proposed definition of "Reliability Directive" and encourages the SDT to look past a compliance based outlook regarding the word "directive". If there is no Reliability Standard support for use of directives to AVOID emergencies, emergencies will continue to occur. Consider using the broader defined term "Operating Communication" from COM-003 rather than "Reliability Directive" in this standard. 2) R1: This requirement, as written, states that the BA, GOP, DP, and LSE must comply with Reliability Directives, which, by definition, are only issued in Emergencies or to prevent instability or Cascading. There is not a requirement in the TOP or IRO standards that obligates a Registered Entity to comply with other directives issued by the TOP or RC used in operating the grid in a reliable manner. For example, some generator operators exceed the operating basepoint that is communicated to the unit by the ISO, which creates congestion and overloads the transmission system. Under the proposed R1 language, there is no requirement for an entity to comply with this type of directive, since it is not a "Reliability Directive" until an Emergency

occurs. 3) R3: Requirement R3 seems to be missing some words. It doesn't say WHAT the TOP should inform other entities about. Also, it is not clear if this requirement is supposed to be about planning ("expected to be affected by anticipated Emergencies") or real-time operations ("known to be affected by actual Emergencies") or both. If the latter is intended, the Time Horizon should include Real-Time Operations and Same Day Operations. We suggest changing the language to "Each Transmission Operator shall inform its Reliability Coordinator and other affected Transmission Operator(s) about each actual or anticipated Emergency, which may be determined in Real-time or based on its assessment of its Operational Planning Analysis" 4) R4: Reinsert Generator Operator applicability from old R6. The stated reason for removal of Generator Operator is incorrect and violates the Functional Model which states that a Balancing Authority may direct "resources (Generator Operators and Load-Serving Entities) to take action to ensure balance in real time" and "direct "Generator Operators to implement redispatch for congestion management". Both of those type actions may include rendering emergency assistance. 5) R5: The requirement implies, but does not specifically state a time frame for informing the RC. The RC must be informed in sufficient time in order to respond to the system condition. The phrase "unless conditions do not permit" is ambiguous and should be made more definite. We suggest rewriting R5 as follows: "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 on those respective Transmission Operator Areas within a timeframe that is sufficient for the RC and affected Transmission Operators to respond to the system condition, unless communication capabilities have failed." The Time Horizon should also include Operations Planning since the Requirement language includes "known or expected." 6) R6: There is a need to include Generator Operator in this requirement. There is no clarification in the mapping document regarding the loss of the applicability to the Generator Operator (previously in TOP-001-1 R3). 7) R8: This requirement, as written, states that the TOP must inform the RC of SOLs based on its assessment of its Operational Planning Analysis, which, by definition, is an analysis for the next day's operation that may occur either a day ahead or as much as 12 months ahead. SOL violations can occur in Real-Time (e.g., transmission thermal limit violations, voltage violations, etc.) due to forced outages from storms or equipment failures that may not have been studied under the Next-Day analysis and various other real time conditions. We suggest rewording the requirement to read "Each Transmission Operator shall inform its Reliability Coordinator of each SOL which, while not an IROL, has been identified by the Transmission Operator as supporting reliability internal to its Transmission Operator Area based ON ANTICIPATED OR ACTUAL EMERGENCIES OCCURRING IN REAL-TIME OR BASED on its assessment of its Operational Planning Analysis." It is important to recognize the Real-Time issues because several of the Requirements following Requirement 8 refer to SOLs "identified in Requirement R8." Additionally, since the definition of SOL includes post-contingency criteria, contingencies are not limited to Operational Planning Analysis timeframes. The VSL language also needs to accommodate Real-Time considerations. 8) R9: See our comment regarding R8 – there is a reliability gap because SOLs identified in Real-Time (as opposed to those identified in the Operational Planning Analysis timeframe) are not included. 9) R10: See our comment regarding R8 – there is a reliability gap in the actions needed to return the system to within limits for SOLs identified in Real-Time as opposed to those identified in the Operational Planning Analysis timeframe. 10) R11: See our comment regarding R8 – there is a reliability gap for SOLs identified in Real-Time as opposed to those identified in the Operational Planning Analysis timeframe. 11) What is the intended difference between "TOP shall not operate outside any SOL" in R9 and "TOP shall act or direct others to act to mitigate both the magnitude and the duration of exceeding . . . an SOL" in R11? The same action or inaction would likely result in violations of both requirements, resulting in a "double-jeopardy" situation.

Yes

No

1) Overall, this change to TOP-003-2 will cause differences in what each TOP/BA thinks it needs in terms of data, which will be difficult to audit. There should be a minimum set of data that the TOP/BA should address (especially when removing more specific Requirements such as those that are deleted from PRC-001-1.) For example, if a TOP or BA decides not to monitor its SPSs, which is currently required by PRC-001-1, there will be no repercussions from a compliance standpoint, but an impact to monitoring the state of reliability will occur. 2) R1: We suggest adding "analysis functions" after Operational Planning Analysis to fully capture performance requirements for a TOP during Real-Time. 3) R2: We suggest adding "Operational Planning Analyses" in front of "analysis functions". The

Operational Planning Analysis, by definition, includes “Expected system conditions such as load forecast(s), generation output levels . . .,” which relate to the Real Power balance requirement that the BA must comply with. A BA should also create a documented specification for the data necessary for it to perform an Operational Planning Analysis, which may include development of integrated operational plans, acquiring reliability-related services from Generator Operators, providing generation dispatch to the Reliability Coordinator, and other responsibilities as dictated by the Functional Model. 4) R3 We suggest adding “analysis functions” after Operational Planning Analysis to fully capture performance requirements for a TOP during Real-Time. 5) R4: We suggest “Operational Planning Analyses” in front of “analysis functions” to be consistent with our comment that R2 should require “Operational Planning Analysis” data in the BA’s data specification. 6) R3 and R4: What is the required time frame required for the TOP and BA to distribute changes to its data specification? We suggest adding a sentence that the TOP or BA must distribute its data specification within 30 calendar days of creation or revision. 7) R5: What is the required time frame for an Entity to satisfy the obligations of the data specification? None is specified. We suggest a time frame of 30 calendar days from the date of receipt to comply with changes to data specifications. 8) The VRF and VSL justification document was inconsistent and unconvincing in several respects related to TOP-003-2 R2. That should be revisited after the requirements are firmed up.

No. 1) Requirements R2, R5 and R6 of PRC-001-1, which are proposed to be deleted, are not actually replaced by any new or revised requirements in other standards, resulting in reliability gaps. The PRC-001-1 requirements relate to Same-day and Real-time Operations, whereas the TOP-003-2 requirements relate only to the Operations Planning time horizon. The real-time elements of the PRC-001-1 requirements are lost. 2) R2- Removal of R2 assumes that the requirement intent will be included in TOP-003-2 R1 or R2 specification, but there is no new requirement to replace R2 of PRC-001. 3) R2 – The requirements to “take corrective action as soon as possible” are extremely important to the reliability of the system and deleting them introduces a reliability gap. In the Issues Database document there is indication that R5 of TOP-001-2 satisfies the need for corrective action as soon as possible with the following phrase “Addressed in Requirement R5 in proposed TOP-001-2 where the Transmission Operator coordinates its operations.” However, the text of TOP-001-2 R5 does not actually support this approach and therefore leaves a reliability gap in the Standards. 4) Texas RE disagrees with several of the PRC-001 issues listed as complete in the Issues Database. The referenced TOP Standards are extremely limited in scope and lacking in details (especially in light of ignoring Real-Time issues) and are not considered interchangeable with the deleted PRC-001 Requirements as suggested. 5) R5- Removal of R5 assumes that the requirement intent will be included in TOP-003-2, but there is no new requirement to replace R5 of PRC-001.. R5 is related to the coordination of changes affecting protection systems of others. R5 should not be removed because it deals with coordination issues and not merely specification and provision of data. 6) R6— We object to the proposed removal of R6 because this Real-time requirement is not picked up anywhere else, and elimination of the requirement to monitor and communicate the status of Special Protection Systems will cause a reliability gap. 7) There are no Measures for Requirements R1 and R3.

No

1) VSL for TOP-001-2 R3: Operational Planning Analysis, by definition, excludes Real-Time issues such as “actual Emergencies.” We suggest improving the requirement as discussed above and then making conforming revisions to this VSL. 2) VSL for TOP-001-2 R5: “When conditions permit” is subjective and ambiguous therefore consistency in auditing will not occur. Are you sure that “whichever is less” is what you mean to say here? (also applies to VSLs for R3, R6 and R8) 3) TOP-001-2 R7: VRF justification statement is incomplete (“The requirements are viewed as similar since they both refer to <missing text>”) 4) TOP-001-2 R8: In the VRF justification, the text in the second and third bullets appears to be garbled. 5) TOP-001-2 R9: We recommend this requirement be assigned a “High” VRF. Uncorrected SOL violations could cause bulk power system instability, separation, and or cascading if exacerbated in Real-Time by other SOL violations, contingencies, faults, or misoperations (and may be dependent on the SOL Methodology timing in FAC-011 and not be captured in TOP-001-2 R7). Note that the VRF justification for R10 correctly refers to a High VRF for R9. Additionally, remove the word “local” in all places used in the R9 VRF justification.

In the Implementation Plan: 1. The Prerequisite Approvals must include COM-002-3 Communication and Coordination, as that is the source of the proposed definition for “Reliability Directive.” 2. The “Effective Date of Revised Standards” does not match the “Effective Date” within TOP-003-2. 3. The difference between “10 months” and “12 months” will either be (a) no difference or (b) a 3-month

difference, since the effective date of each requirement will fall on the first day of the following calendar quarter. Additionally, since there are no time limits included in the TOP-003 requirements, the reason for the intended timeline differential (2 months) is not supported and arbitrary. We suggest having one effective date for all requirements, and providing clear time requirements for issuing data specifications and submitting responses.

Individual

Darryl Curtis

Oncor Electric Delivery

No

"Oncor respectfully takes the position that the proposed language in R6 will not provide a coordinated communication effort in the event of a planned outage of telemetry, control equipment and associated communication channels. The term "negatively impacted interconnected registered entities" is too broad and too subjective. Oncor believes that the Reliability Coordinator is in the best position to determine who is negatively impacted and that they should be the entity that makes further notification after receiving the initial planned outage request from the originating entity."

No

Oncor respectfully takes the position that the language as proposed in R3 places the Transmission Operator in a position of having to determine who or who is not NERC Registered. Oncor agrees that the Operational Analysis Plan should be properly communicated, but that it should not be the role of the Transmission Operator to determine who is or who is not NERC Registered.

Yes

Agree with changes

No

For TPL-001 "Oncor respectfully takes the position that the proposed language in R6 will not provide a coordinated communication effort in the event of a planned outage of telemetry, control equipment and associated communication channels. The term "negatively impacted interconnected registered entities" is too broad and too subjective. Oncor believes that the Reliability Coordinator is in the best position to determine who is negatively impacted and that they should be the entity that makes further notification after receiving the initial planned outage request from the originating entity."

No further comment

Individual

Eric Salsbury

Consumers Energy

No

The Reliability Directive definition is not strong enough and leaves too much to interpretation. We feel that the other requirements and items in the standard are acceptable and we could support this version if the definition had more clarity.

No

This standard gives the TOP more direct authority than is in the MISO process today. The market has means to accommodate this operation. In R3, this may conflict with the present logic our TOP follows concerning their operation in the area of communicating conditions to Generation Operators and other Market Participants. We do not support this standard as written.

No

The standard as written is more vague than the current TOP-003. It follows the logic of IRO-010 and talks about specification documents instead of actions that need to be taken. We do not support this standard as written.

The standards that are in place and active clearly define what needs to be done for the reliability of the system. These new standards are designed to make auditing easier. This should not be the goal of these documents. The current active documents do not need to be changed.

Group

SPP Standards Review Group
Robert Rhodes
Yes
Yes
Yes
No (The Yes/No boxes weren't on the screen. All I got was the comment box.) Deleting the requirements from PRC-001 and including them in R1 and R2 of TOP-003-2 raises the question of what other types of data or information need to be included in the specification that do not normally come to mind when considering this type of information. To be sure that all the bases are covered, we would suggest that the SDT provide a guideline which incorporates the types of data and information they envisioned when drafting these requirements. Additionally, incorporating protective relay information in the data specifications of R1 and R2 raises the potential for auditors to question the contents of an entity's specification. Again, guidance is needed on the part of the TOP and BA in developing the specification initially. Could the SDT provide this initial guidance, or list of examples, in the form of a guideline? Also, measures for R1 and R3 are missing.
Yes
TOP-001 – While we agree with what we believe to be the intent of R9, using the word ‘continuous’ without sufficient context remains ambiguous so as to prevent clear interpretation by all parties. We would suggest replacing the word ‘continuous’ in R9 with ‘applicable’. The timing criterion associated with an SOL should be associated with the timing criterion of the Facility Rating or Stability criteria. The revised requirement would read: Each Transmission Operator shall not operate outside any System Operating Limit (SOL) identified in Requirement R8 for the applicable duration that would cause a violation of the Facility Rating or Stability criteria upon which it is based. TOP-003 – We have concerns with R1 and R2 being as open-ended as they are, especially since they are followed by the obligation to provide that data contained in R5. For example, how do you resolve issues when a mutual agreement cannot be reached? If an entity feels that the requestor is asking for data that goes beyond what they would reasonably need to perform their analysis, what process is used to resolve the stand-off?
Group
Western Electricity Coordinating Council
Steve Rueckert
Yes
I support the language of the VSLs for the proposed standards. I also understand the logic behind the statement included above the VSLs for R8 of TOP-001 and R3 and R4 of TOP-003. However, I question whether or not it is appropriate for this type of language to appear in the VSLs. It seems that this should be handled by the Regional Enforcement departments.
Group
Florida Municipal Power Agency
Frank Gaffney
No
The existing TOP-001-1 R7 essentially requires communication to the RC and neighboring TOPs any time a Facility is to be switched. The new TOP-001-2 R5 will only require such communication when such switching would result in an "Adverse Reliability Impact" defined as: "The impact of an event that results in frequency-related instability; unplanned tripping of load or generation; or uncontrolled

separation or cascading outages that affects a widespread area of the Interconnection." This significantly reduces the requirements for communication / notification for switching Facilities. It is worthwhile to communicate switching of some Facilities whether or not they would result in an "Adverse Reliability Impact". Suggest rephrasing to something like any unplanned switching of Facilities not "noticed" through data provision of TOP-003-2. With the number of human error events that have occurred, we should not be reducing the communication / notification requirements. R8 is not needed since it is already covered in FAC-014-2 R5.2. As a result, R9, R10 and R11 ought to be modified to refer to FAC-014-2 rather than R8.

No

The existing TOP-002-2 requires that both the BA and TOP perform current day, next day and seasonal plans. In the new TOP-002-3, the BA is eliminated from the applicability. Nowhere else in the standards is there a requirement for the BA to perform current-day, next-day and seasonal planning. The mapping document points to BAL-002 and the requirement for a BA to have enough Contingency Reserves (and confuses the references saying the R2 of BAL-002-1 requires a "plan", which it does not say). However, this is a real-time requirement of a BA and is not an operations planning analysis and is not a day-ahead plan. There ought to be a day-ahead plan to start enough generation to enable the load plus operating reserves to be met, which the existing TOP-02-2 standard essentially assigns to the BA. The mapping document also points to BAL-001, but, a 12-month rolling average of ACE has very little to do with day-ahead planning. And finally, the mapping document points to coordination needed in the Functional Model. The Functional Model is not mandatory and should not be depended upon in this manner. The mapping document says that the TOP develops the plan and passes it to the BA. This is not the case for unit commitment. For unit commitment, it is usually the other way around. TOPs develop constraints (e.g., SOLs) that the market participants use to transact; hence, the market participants (which involve the BAs) develop the transactions (which include unit commitment) often in parallel with the TOPs plans. TOPs do not plan or direct unit commitment except in cases where a unit needs to be "reliability must-run". FMPA is aware that there may be efforts to insert next-day planning into new BAL standards under development; however, it will be some time before those new standards are approved. IN the meantime, the new TOP standards should include operational planning analyses for the BA on an interim basis until those new BA standard(s) are approved and mandatory so that we do not create a gap in the interim. In addition, the standard has eliminated the current-day day and seasonal assessments and focuses only on next-day. FMPA believes that both current-day and seasonal remain important, to cover changes from yesterday's plan (e.g., unplanned outages that have occurred since yesterday's plan), and to coordinate planned outages seasonally. R1 - The SDT introduces a new term "Stability Limit" which seems duplicative of an SOL and adds a layer of ambiguity. What Stability Limits exist that would not be an SOL or IROL? Also, R1 and R2 become inconsistent with R1 referring to "Facility Ratings" and "Stability Limits" whereas R2 refers to "SOLs" and "IROLs". It would seem the two requirements should consistently use "SOLs" and "IROLs" consistently with FAC-014-2.

No

Related to the BA performing a day-ahead plan discussed in FMPA's response to question 2, TOP-003-2 R2 only requires a BA to develop data specifications for reporting in real-time (i.e., bullet 2.1). There should be requirements for day-ahead as well. There are a number of data requirements that are proposed to be deleted and replaced with an ambiguous reference to a "specification for the data necessary", or a data specification, without any minimal requirements for what should be in that data specification. This approach will likely not go over well with the regulators. The SDT should be able to define a minimal list of data required, e.g., "such data specification will at minimum include: next-day load forecasts, next-day planned outages, generator capacity changes, protection system failures, special protection system status, real-time monitoring of generation and transmission, transmission Facility status, etc., etc." (note that these are all examples of specific requirements within the existing standards that the SDT is proposing to delete), possibly as an attachment to the standard.

Please see response to Question 6

While FMPA agrees with a results-based approach to standards, it seems to us that there have been a number of human-error based problems that justify agreed upon protocols and procedures being covered by the standards. Hence, TOP-004 R6, which requires development of formal policies and procedures among neighboring TOPs should not be eliminated from the standards. On the Mapping Document, TOP-004-2 R5, on the discussion that the requirement be deleted, the document says that

the TOP does not have the authority to unilaterally separate without the approval of the RC. FMPA believes that they do if there is an imminent threat (e.g., the exceptions to IRO-001-2 of "unless such actions would violate safety, equipment, or regulatory or statutory requirements"). So, while FMPA agrees that the requirement can be deleted, the reason for the deletion does not seem accurate.

Individual

Randall McCamish

City of Vero

No

The existing TOP-001-1 R7 essentially requires communication to the RC and neighboring TOPs any time a Facility is to be switched. The new TOP-001-2 R5 will only require such communication when such switching would result in an "Adverse Reliability Impact" defined as: "The impact of an event that results in frequency-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages that affects a widespread area of the Interconnection." This significantly reduces the requirements for communication / notification for switching Facilities. It is worthwhile to communicate switching of some Facilities whether or not they would result in an "Adverse Reliability Impact". Suggest rephrasing to something like any unplanned switching of Facilities not "noticed" through data provision of TOP-003-2. With the number of human error events that have occurred, we should not be reducing the communication / notification requirements. R8 is not needed since it is already covered in FAC-014-2 R5.2. As a result, R9, R10 and R11 ought to be modified to refer to FAC-014-2 rather than R8.

No

The existing TOP-002-2 requires that both the BA and TOP perform current day, next day and seasonal plans. In the new TOP-002-3, the BA is eliminated from the applicability. Nowhere else in the standards is there a requirement for the BA to perform current-day, next-day and seasonal planning. The mapping document points to BAL-002 and the requirement for a BA to have enough Contingency Reserves (and confuses the references saying the R2 of BAL-002-1 requires a "plan", which it does not say). However, this is a real-time requirement of a BA and is not an operations planning analysis and is not a day-ahead plan. There ought to be a day-ahead plan to start enough generation to enable the load plus operating reserves to be met, which the existing TOP-02-2 standard essentially assigns to the BA. The mapping document also points to BAL-001, but, a 12-month rolling average of ACE has very little to do with day-ahead planning. And finally, the mapping document points to coordination needed in the Functional Model. The Functional Model is not mandatory and should not be depended upon in this manner. The mapping document says that the TOP develops the plan and passes it to the BA. This is not the case for unit commitment. For unit commitment, it is usually the other way around. TOPs develop constraints (e.g., SOLs) that the market participants use to transact; hence, the market participants (which involve the BAs) develop the transactions (which include unit commitment) often in parallel with the TOPs plans. TOPs do not plan or direct unit commitment except in cases where a unit needs to be "reliability must-run". FMPA is aware that there may be efforts to insert next-day planning into new BAL standards under development; however, it will be some time before those new standards are approved. IN the meantime, the new TOP standards should include operational planning analyses for the BA on an interim basis until those new BA standard(s) are approved and mandatory so that we do not create a gap in the interim. In addition, the standard has eliminated the current-day day and seasonal assessments and focuses only on next-day. FMPA believes that both current-day and seasonal remain important, to cover changes from yesterday's plan (e.g., unplanned outages that have occurred since yesterday's plan), and to coordinate planned outages seasonally. R1 - The SDT introduces a new term "Stability Limit" which seems duplicative of an SOL and adds a layer of ambiguity. What Stability Limits exist that would not be an SOL or IROL? Also, R1 and R2 become inconsistent with R1 referring to "Facility Ratings" and "Stability Limits" whereas R2 refers to "SOLs" and "IROLs". It would seem the two requirements should consistently use "SOLs" and "IROLs" consistently with FAC-014-2.

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Please see response to Question 6

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Individual

J. S. Stonecipher, PE

Beaches Energy Services of the City of Jacksonville Beach, Florida

No

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Individual

Gregory Campoli

New York Independent System Operator

No

The SDT did not provide reasonable assurance that documented determination of 'Reliability Directive' identification was sufficient to meet R1, in the absents of explicit identificaation during every verbal communication. We believe it is not clear to an auditor that written procedures would be an adequate level of 'identification. A possible solution would be to add R1.1 and spell out that identification of Reliability Directive shall be communicated through approved procedures or verbal identification. In addition, Requirement 11 gives the TOP the authority to "...act or direct others to act..." to mitigate IROL and certain SOL exceedances. Is it the intent of the SDT that the TOP can direct any of the entities to which this standard is applicable? Also SDT should consider a change to say "... act or issue a Reliability Directive to' This ties the requirement back to R1 with an obligation to complete the directive. The NYISO is also concern with the use of the definition of 'Reliability Directive' that has not been approved. We recommend balloting TOP-001 simultaneously with the RC Project that includes the definition. As it stands we support the proposed definition. The NYISO suggest

Yes

Yes

TOP-001 R6 What is the difference between "negatively impacted interconnected NERC entities" and "affected entities"? Are both of these the entities for which this standard is applicable?

Individual
Patrick Brown
Essential Power, LLC
Yes
Yes
Yes, I support the recommendation.
Individual
Tony Jankowski
Wisconsin Electric Power Company
No
The SDT's response for previous comments on R6 is that "The intent of the requirement is to notify those entities that are directly affected by the telemetry outage. " If that is the intent of the requirement then the requirement should state that. Also, "negatively impacted" needs to have some sort of bounds. Loss of \$1 in revenue is a negative impact.
Individual
Kathleen Goodman
ISO New England Inc
Yes
Vote Your Affirmative vote has been recorded. Ballot Project 2007-03 SB TOP-001-2 March 2012_in Description Project 2007-03 SB TOP-001-2 March 2012 Vote Affirmative Comment TOP-001 Standard uses an undefined term "Reliability Directive" which is being proposed in the Reliability Coordinator Standards project. We believe that NERC should post these inter-related projects simultaneous in order to achieve industry support to move these important projects forward. If the RTO Project is approved, it should only be presented to the BOT simultaneously with an approved RC Standards project. Additionally, if the definition of "Reliability Directive" is modified in any way in the Reliability Coordinator Standards project, this would be a material change to this standard and could result in company's filing comments in opposition to FERC.
Yes
Yes
Individual
Brian J Murphy
NextEra Energy, Inc.
Yes
Yes

Yes
NextEra believes additional editing is needed to provide the step-by-step clarity the proposed Reliability Standard seeks to implement. To provide more clarity, NextEra suggests that in R3, R4 and R5 be rewritten as follows: "R3. Consistent with the requirements of R1, each Transmission Operator shall distribute its request for data to each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider that has data required to be used in the Transmission Operator's Operational Planning Analysis and Real-time monitoring process. " "R.4 Consistent with the requirements of R2, each Balancing Authority shall distribute its data request to each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider that has data required to be used in the Balancing Authority's analysis functions and Real-time monitoring process." "R5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider that receives a data request pursuant to Requirement R3 or R4 shall provide the requested data."
Yes, we agree.
Yes
Individual
Russell A. Noble
Cowlitz County PUD
Yes
Yes
This Standard is not applicable to Cowlitz PUD and the District will abstain in the ballot. However, this commenter sees no problems with the changes.
No
After reviewing the industry comments submitted, Cowlitz is respectfully perplexed why comments were not addressed related to lack of recourse the receiving entity of a data specification has if the data specification is unreasonable. The data specification receiving entity must have some recourse to appeal unreasonable obligation requirements short of appealing a violation finding through the RE/NERC/FERC or ultimately a court of law. Due to the undefined nature of what constitutes a reasonable data specification document other than a "mutually agreeable format," the risk of capricious dictatorial demands having no reliability return is high. The usage of "format" can only encompass the organization, plan, and style of the data to be submitted; this can't be used to limit data submittal to that which is available at a rate of transmittal which is possible. Cowlitz can't find a remedy for requirement R5 without allowing for some risk of entity intransigent behavior leading to RE or ERO intervention. However, there are current standards that allow, but limit, this risk by defining allowable exceptions. Examples which include such exceptions to requirements are "unless such actions would violate safety..." contained in several standards; and "unless it provides a reliability reason to the requestor..." contained in Standard IRO-006-5. Cowlitz suggests the following exemptions: Unless data or information is not available without installation of additional equipment, or can't be reasonably available due to existing equipment limitations, available personnel limitations, or unexpected equipment failure.
Cowlitz supports the retirement.
No
After reviewing the industry comments submitted, Cowlitz is respectfully perplexed why comments were not addressed related to the VSL binary treatment of R5. A data specification document may be very complex, and the Standard does not define non-compliance other than obligations were not satisfied. One data variable missing (either accidental omission or inability to provide) can incur an immediate violation if the data specification document does not include any leniency in this regard. Further, the proposed VLS for R5 does not allow for any credit of the entity's effort in fulfilling the

obligations set forth in a data specification document.
It may be best to treat the data specification documentation as an agreement between entities where authorizing signatures from both entities are required to make the agreement effective.
Group
Bonneville Power Administration
Chris Higgins
No
<p>BPA does not believe that the drafting teams' consideration of our previously submitted comments during the last round was adequate. The response appeared to be based on the assumption that the SOL or IROL was based on a thermal limit, not a stability limit. Since a system can go unstable in less than 1 second, the drafting team's response that, "ratings include the qualifiers of time..." did not make sense to us in the context of a "stability limit". As stated in BPA's previous comments, it takes a definite amount of time to readjust the system (change schedules, move generation, or perform other actions) in order to get actual flows down to reliable operating limits when flows have exceeded limits. The standards need to clearly articulate how much time the responsible entities have to accomplish this. The current standard TOP-004-2, R4 clearly articulates a 30 minute rule for this. TOP-001 needs to do the same, especially if TOP-001 will replace TOP-004-2. Previous 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. Additional New Comments: TOP-001 introduces a new term and definition, Reliability Directive. This term is used in R1 of the standard in conjunction with two other defined terms, 'Emergency' and 'Adverse Reliability Impacts'. The time horizon described for R1 is 'Operations-Planning'. The timeframes for which this standard applies are 'Operations-Planning', 'Same-Day Operations' and 'Real-Time'. However, if we review the definitions associated with 'Emergency' and 'Adverse Reliability Impacts', it is clear that these terms are used for events that occur only during real time operations. BPA recommends that R1 be re-worded so that the Time Horizons are consistent with the terms used in the standard; that the Reliability Directive definition be clarified so that the timing of the directive is identified; and that use of the terms 'Emergency' and 'Adverse Reliability Impact' be consistent with their definitions, and the 30 minute rule for getting actual flows back within a reliable limit be inserted. BPA recommends that the applicability of R6 be expanded to also include Generation Operators. The intent of this requirement is for those entities with "telemetry equipment, control equipment and associated communications channels" to coordinate outage of such equipment with its Reliability Coordinator and negatively impacted interconnected NERC registered entities. Though Generation Operators have such equipment, as written, this requirement does not require that the coordinate such outages in the same manner as Balancing Authorities and Transmission Operators are required to under this requirement.</p>
No
<p>BPA appreciates the drafting team's response to our previous comments and recommends additional clarification: Previous Comments: Given the potential uncertainty regarding how many day ahead studies may be required, BPA suggests adding more clarity to the standard TOP-002-3 to address. 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 of service start and stop times associated with planned maintenance and construction 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. Additional New Comments: Many entities tend to perform system studies more than one day ahead. Please specify the threshold at which a prior study would have to be updated to meet the next day study requirement. BPA suggests alternate language for the requirement ...something along the lines of ... An entity or TOP may perform a study more than one day in advance; they shall update the study if system conditions (such as line outages, etc.) changed such that there was more than a 5% change in the system operating limit, thereby requiring the need to rerun the study.</p>

Yes
BPA is in support of this standard due to the importance of being able to receive data.
Yes, BPA is in support of the retirement of the three requirements in PRC-001 as the SDT is suggesting.
TOP-001-2 VRFs/VSLs – NO - BPA recommends a sliding scale based on duration and percentage of the SOL violation. Example: If an entity is high by 2% of the SOL for 1 minute, their VSL should be substantially lower than if they were 25% off for more than 30 minutes. Sliding scale should start at the bottom ... couple of MW for a minute ... as an example. TOP-002-3: VRFs/VSLs – NO – BPA recommends a sliding scale based on how far off the original study was from the after the fact analysis. Example: If an entity did not have a study, the penalty should be severe. If an entity did have a study, but it was only 5% off, the penalty should be less severe. TOP-003-2 VRFs/VSLs – YES - BPA is in support.
Group
Kansas City Power & Light
Michael Gammon
No
Continuous duration” in R9 is not a defined term and will cause uncertainty and debate under audit as to what time frame this represents. Recommend R9 be modified to reflect the time basis established through the methodology to develop the SOL for the applicable facilities. Suggested modification for R9: Each Transmission Operator shall not operate outside any System Operating Limit (SOL) identified in Requirement R8 for a continuous duration that exceeds the Facility Rating or Stability criteria upon which the SOL is based.
Yes
There is no reliability purpose served by an Entity developing and posting specifications of data needed to perform its Operational Planning Analysis and Real-time monitoring. The only reliability action that matters is the request for data specific to other Entities in order to perform analysis and monitor operating conditions. These requirements would be more effective if they targeted the following principles: 1. Identify the data needed to perform analysis and effectively monitor operating conditions, 2. Identify the Entities that may have data useful to support analysis and monitoring operating conditions and, 3. Seek to obtain the data from other Entities by engaging the other Entities and coming to a mutual agreement regarding data exchange with the Entity Requirement R5 does not allow for “mutual agreement” as the SDT has suggested in their response to comments from the last draft. As written, this requirement will cause an Entity that is a recipient of a request for data to fail the requirement if a mutual agreement cannot be made. The SDT further states in their response to comments that requirements R1 and R2 ensure disparity between Entities cannot occur. On the contrary, the specifications that are developed as required by these requirements lock an Entity into that specification. If another Entity cannot meet any part of the specification in a data exchange request, there is no recourse in these requirements to relax the specification. The SDT has good intentions, however, these requirements as written do not allow for the flexibility needed in the exchange of data with other parties.
No other comments.
No
In addition, the VSL for R5 in TOP-003 does not reflect partial efforts to exchange data by Entities.
No other comments.

Please see additional comments received from AEP and ACES Power Marketing.

Attached

Comment Form for 7th Draft of Standards

Project 2007-03 Real-time Operations

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Background Information:

This posting represents a successive ballot for TOP-001-2, TOP-002-3, and TOP-003-2.

In the 7th 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 6th posting and suggestions made during the Quality Review. Changes made were:

TOP-001-2:

- Requirement R1 – Allowed for plural Transmission Operators and deleted second instance of ‘identified’
- Requirement R6 – changed ‘the’ to ‘its’ Reliability Coordinator
- Requirement R8 – changed ‘internal area’ to ‘internal to its Transmission Operator Area’; changed the Time Horizon to only Operations Planning
- Requirement R10 – changed ‘each’ SOL to ‘an’ SOL
- Data Retention – Changed voice recordings to 90 calendar days from three calendar months
- Revised VSLs for Requirements R1, R3, R5, and R10

TOP-002-3:

- Requirement R2 - changed ‘internal area’ to ‘internal to its Transmission Operator Area’

TOP-003-1:

- Applicability – added Distribution Provider
- Requirement R2 – added analysis functions for the Balancing Authority
- Requirement R3 – Cited the tie to Requirement R1 and made the language in Requirement R3 consistent with that in Requirement R1
- Requirement R4 - Cited the tie to Requirement R2 and made the language in Requirement R4 consistent with that in Requirement R2
- Requirement R5 – added Distribution Provider
- Measures M3 and M4 – clarified the web posting item of evidence

- Revised VSLs for Requirements R1, R2, R3, and R4

The Implementation Plan and effective dates for all three standards now show a twelve month compliance period for all requirements except Requirements R1, R2, R3, and R4 of TOP-003-2 which will become effective ten months from the approval date.

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:

In the previous comment period, AEP requested clarification on whether these requirements are in regards to pre-contingency monitoring or instead based on real-time flow. AEP assumed this was based on Real Time Flow, but we encouraged the drafting team to provide clarifying language to make it more clear to the reader. The drafting team responded by noting that IROLs have been defined as both pre-contingent and post-contingent, and that the exact definition of the IROL must be honored. However, no such clarifying language was added to the standard. Time and time again, industry has provided comments to standard drafting teams in an effort to help avoid CANs, Interpretation Requests, and to increase the consistency of interpretation by both CEA’s and industry. In this case, while the team provided insight in their comments, the resulting lack of changes to the standard still leave unnecessary ambiguity that could be easily addressed. Ambiguity of any kind deters from, rather than promotes, the reliability of the BES. Until such clarification is added to the standard itself, AEP cannot support the drafting team’s efforts in revising TOP-001-2.

R1: The timeframe should be identified.

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:

In the previous comment period, AEP requested clarification on whether these requirements are in regards to pre-contingency monitoring or instead based on real-time flow. AEP assumed this was based on Real Time Flow, but we encouraged the drafting team to provide clarifying language to make it more clear to the reader. The drafting team responded by noting that “TOP-002-3 is about Operations Planning, thus it cannot be addressing actual Real-time flow” and “It addresses those flows contained in the Operational Planning Analysis (OPA) and the assessment thereof.” However, no such clarifying language was added to the standard. As stated in our response to Question #1, industry has provided comments to standard drafting teams in an effort to help avoid CANs, Interpretation Requests, and to increase the consistency of interpretation by both CEA’s and industry. And once again, while the team provided insight in their comments, the resulting lack of changes to the standard still leave unnecessary ambiguity that could be easily addressed. Ambiguity of any kind deters from, rather than promotes, the reliability of the BES. Until such clarification is added to the standard itself, AEP cannot support the drafting team’s efforts in revising TOP-002-3.

Rather than using terms such as “real-time flow”, we recommend using “projected post-contingency” and “projected pre-contingency”.

3. The SDT made changes to TOP-003-2 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:

In the previous comment period, AEP suggested that R5 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 SDT responded by stating that “Requirement R5 is bound by the constraints of Requirements R1 and R2 so that not just any information can be requested.” AEP does not see any explicit constraints specified in R1 or R2, and even if constraints were noted there, see nothing that would indicate those constraints would also apply to R5. At the most, the only possible constraint could be the “mutually agreeable format”, however that would seem to provide no bounds or constraints on the kind or amount of data being requested. We suggest providing further clarification that what has been mutually agreed to by the parties involved, goes beyond simply the format of the data. In addition, it needs to be made clear that those constraints also apply to R5. Until such clarification is added to the standard itself, AEP cannot support the drafting team’s efforts in revising TOP-003-2.

4. The SDT is suggesting the retirement of three requirements in PRC-001 since those requirements deal with data handling and can now be incorporated in the data specification concept suggested for TOP-003-2. 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: [While AEP supports, in general, the removal of redundant requirements across standards, we do not yet agree with the proposed changes to TOP-003-2 \(for the reasons provided in our response to Question #3\). As such, AEP will reserve comment on any future changes that might be made to PRC-001 until further progress is made on TOP-003-2.](#)

5. The VRF, VSL, and Time Horizons are part of a non-binding poll. Please indicate whether you agree or disagree with the VRF, VSL, and Time Horizon assignments. 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:

[In general, the VRFs and VSLs are too severe and punitive. Those stated for R1, R2, and R5 of TOP-001-2 are especially so, given what we see as open-endedness to what might be requested. As a result, AEP cannot support the proposed VRFs and VSLs.](#)

6. If you have any other comments on these standards that you have not already provided in response to the prior questions, please provide them here.

Comments:

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Project 2007-03 Real-time Operations

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- Requirement R6 – changed ‘the’ to ‘its’ Reliability Coordinator
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- Requirement R10 – changed ‘each’ SOL to ‘an’ SOL
- Data Retention – Changed voice recordings to 90 calendar days from three calendar months
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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 generally agree with TOP-001 and the changes since the last posting. However, we continue to believe that use of the language "know or expected to be" in Requirement R3 is confusing and that this is a case where brevity is more effective in communicating the requirement. We believe striking this clause will improve the clarity of the requirement. As the clause is written now, it is not clear to whom it applies? We assume the SDT intended for the notification to be based on the expectation or knowledge of the TOP to whom the requirement applies. However, the clause is not clear on this but is rather a statement that appears to be some general knowledge or expectation. This opens the possibility of an auditor substituting their expectation or knowledge over the applicable TOP. Requirement R5 has a similar issue.

We are concerned that the examples listed in Requirement R5 may be too simplistic and could be interpreted too literally. A change in load is one example. Thus, a simple reading of the requirement would imply that a Transmission Operator that has a 1 MW change in a 10,000 MW would be required to notify the Reliability Coordinator. Clearly, that is not what is intended. To resolve this issue, two solutions could be applied. One solution would be to state that changes must be significant. A second solution would be to strike the examples altogether.

Requirements R10 and R11 are inconsistent. Requirement R10 states the Transmission Operator must inform the RC of "its actions" to mitigate an IROL or SOL that has been exceeded while Requirement R11 compels the Transmission Operator "to act or direct others to act" to mitigate an IROL or SOL that has been exceeded. While we consider that a Transmission Operator directing others to act is the same as taking action itself, it would appear Requirement R11 does not consider directed actions as the actions of the Transmission Operator. This would imply that Requirement R10 does not include communication of the directed actions since it applies to Transmission Operator actions. However, we do not believe exclusion of Transmission Operator actions was intended in Requirement R10. The simplest solution to align these two requirements more closely would be to change "its" in Requirement R10 to "the". In this way, Requirement R10 is not limited to only the actions taken directly by the Transmission Operator.

The language in the Data Retention section regarding Requirements R7 and R9 needs to be made more consistent with the requirement. We are concerned that language could be interpreted as compelling the Transmission Operator to retain data for any IROL that is temporarily exceeded for a duration less than T_v or an SOL that is exceeded for a time that

does not violate the criteria upon which it is based. Neither of these instances would represent a violation of either Requirement R7 or R9. Thus, the data is not necessary to be retained.

Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.

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 generally agree with the changes to the standard. However, we have identified the following concerns.

TOP-001-2 R8 implies the Transmission Operator must look for SOLs that are not IROLs in its Operational Planning Analysis that must be completed per TOP-002-3 R1. There is no such requirement in TOP-002-3 R1 or any other requirement that compels a Transmission Operator to look for these SOLs that are not IROLs. Thus, the SDT needs to clarify if a Transmission Operator is required to look for these SOLs that are not IROLs in the Operational Planning Analyses and why they are not referenced in TOP-003-2 R1. If the SDT did not intend for a Transmission Operator to be required to look for these SOLs that are not IROLs, then it needs to refine TOP-001-2 R8 to be clear that the Transmission Operator may not have a need for these SOLs that are not IROLs. TOP-002-3 R2 further confuses the situation by referring to the SOLs that are not IROLs that are identified in TOP-002-3 R1 rather than TOP-001-2 R8.

Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific

part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.

We disagree with the inclusion of voice recordings as an example of the type of evidence that might be retained for TOP-002-3. Operational Planning Analyses are typically conducted in a back office where communications would not be recorded. This might create the impression that there is now a requirement to record such conversations. Recording of these conversations could mute much of the discussion that occurs among personnel performing these studies and working to resolve issues identified in them. Also, the three months retention period is not consistent with the change made to the retention period in TOP-001-2. It was changed to 90 days for voice recordings.

3. The SDT made changes to TOP-003-2 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: Generally, we agree with the standard. However, we have one concern regarding the Data Retention section. The third bullet compels the Transmission Operator to retain evidence for three calendar years that it distributed its data specification. Because the data needs do not change frequently, it is possible that the Transmission Operator will have periods greater than three years in which the data specification was not updated and, thus, not communicated. What data and information would the Transmission Operator use to demonstrate compliance in this situation? Would an attestation be appropriate? If so, the measure should be updated to reflect this.

All of the responses to comments regarding concerns of Requirement R5 indicate that the SDT intended for Requirement R5 to apply to the general satisfaction of the data specification and not any specific data points. However, the Data Retention section does not support this view point. It requires retention of 90 days worth of data. Normally, short periods of data are retained when they are expected to be voluminous. Thus, we assume the Data Retention section was anticipating that the actual data supplied would be retained. This seems inconsistent with the concept of generally satisfying the data specification. It would make more sense to have a statement from the

Transmission Operator indicating the data specification has been satisfied or documentation of the enabling of data links to demonstrate general satisfaction of the data requirements.

Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.

4. The SDT is suggesting the retirement of three requirements in PRC-001 since those requirements deal with data handling and can now be incorporated in the data specification concept suggested for TOP-003-2. 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: While we are supportive of the changes, they do not appear to be coordinated with the Project 2007-06 System Protection Coordination that was started recently. It appears to retain the retired requirements.

5. The VRF, VSL, and Time Horizons are part of a non-binding poll. Please indicate whether you agree or disagree with the VRF, VSL, and Time Horizon assignments. 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: The Moderate and High VSLs for TOP-001-2 R3, R5, R6, and R8 incorrectly use an “or” condition when “and” is necessary to establish the range of percentages of performance. As written now, any percentage from 0 to 100% qualifies for both VSLs.

The following boiler plate language that is written before the VSLs for TOP-001-2 R8 needs to be included before all sets of VSLs that give an option to use integers or percentages. Otherwise, the VSLs will overlap. It should be included before TOP-001-2 R3, R5, and R6.

“For the Requirement X VSL only, the intent of the SDT is to start with the Severe VSL first and then to work your way to the left until you find the situation that fits. In this manner, the VSL will not be discriminatory by size of entity. If a small entity has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation.”

For the Severe VSL of TOP-002-3 R3, an extra space is needed before “15%”.

6. If you have any other comments on these standards that you have not already provided in response to the prior questions, please provide them here.

Comments: