

**Individual or group. (44 Responses)**  
**Name (22 Responses)**  
**Organization (22 Responses)**  
**Group Name (22 Responses)**  
**Lead Contact (22 Responses)**  
**Question 1 (40 Responses)**  
**Question 1 Comments (44 Responses)**  
**Question 2 (39 Responses)**  
**Question 2 Comments (44 Responses)**  
**Question 3 (41 Responses)**  
**Question 3 Comments (44 Responses)**  
**Question 4 (30 Responses)**  
**Question 4 Comments (44 Responses)**  
**Question 5 (0 Responses)**  
**Question 5 Comments (44 Responses)**

Group
SERC OC Standards Review Group
Gerald Beckerle
No
While we generally agree with the changes that were made, we do not feel the standard is ready for balloting based on the following comments: R1 and R2 – In both requirements, notification of the TOP is required and appears to be for the same condition. If this is not so, the requirements need to be more specific regarding the reasons for notification. For example, R1 appears to require notification for specific conditions regarding violations of safety, equipment, regulatory or statutory requirements and R2 could be interpreted that after agreeing to and during the course of complying with a reliability directive, the entity was unable to do so. The group does not feel that these two requirements need to be separated. R3 – This requirement appears to be an operational planning requirement and may more appropriately be inserted in TOP-002-3. If it remains in this standard, we suggest the following wording: Each TOP shall inform its RC and all other TOPs that are expected to be affected by anticipated emergencies based on its operational planning analysis. (We think “assessment” is synonymous with “analysis”). We also believe that R5 is intended to cover real-time operations. The time horizons do not appear to match the requirement, i.e., Operations Planning. R4 – No comments R5 – We recommend similar language to that in R3 for consistency and clarity, i.e., R3 has “all other transmission operators” and R5 has “other Transmission Operators”. R6 – What is meant by “associated communication channels”? Data or Voice or both? Is this not covered by the COM Standards? R7 – No comments R8 – The use of Operational Planning Analysis in this requirement is not consistent with the Time Horizon of Real-time Operations. R9 – We feel the time limit should be 90 minutes for exceeding an SOL, to allow for use of TLR procedures or other measures. R10 and R11 – Logically these two requirements should be swapped so that the requirement to act is performed prior to notification of actions taken. The reference to 30 minutes should be changed to 90 minutes (see comment to R9 above).
No
R1 – No comments R2 – The word “preclude” can be interpreted as “prevent”, which would mean that any exceedance of an IROL or SOL would be a violation, regardless of duration. Other wording, such as “avoid” should be considered. R3 – No comments
Yes
R1.1 - It is our understanding that bullets should be avoided in the requirements. R2 – No comments R3 – No comments R4 – No comments
The group did not respond to this question
The SERC OC Standards review group acknowledges the work performed by SDT, and would appreciate the consideration of the groups comments listed above. “The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.”

Individual
Michael Lombardi
Northeast Utilities
Yes
Suggest rearranging R4 to read: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory, or statutory requirements, and provided that the requesting entity has implemented its comparable emergency procedures.
Yes
Yes
Editorial comment: Remove "M5" because there is not any corresponding text and there is not a corresponding R5.
Yes
For TOP-001-2 Requirements R3, R5, R6 and R8, suggest changing "or' to "and" - that is change "...more than x% OR less than or equal to y%..." to "...more than x% AND less than or equal to y%..."
None - thanks
Group
Northeast Power Coordinating Council
Guy Zito
No
In Requirement R2, there is a need to specify how much time should be allowed to "inform its Transmission Operator upon recognition of its inability to perform an identified Reliability Directive issued by that Transmission Operator." Suggest rewording R2 to read: Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall immediately inform its Transmission Operator of its inability to perform a Reliability Directive. In Requirement R4, we suggest the following rearrangement of the sentence to improve readability: R4: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory, or statutory requirements, and provided that the requesting entity has implemented its comparable emergency procedures. The requirement(s) (R9, 10 and 11) that stipulate returning SOLs which "have been identified as supporting internal area reliability" within 30 minutes should be modified to allow the TOP and RC to determine the appropriate timeframe for correcting such limits. The maintenance of Interconnection reliability and Bulk Electric System integrity is paramount, and global specifications may or may not be appropriate for a local area. Suggest modifying the appropriate wording to: within a specified time not to exceed the timeframe specified by the TOP. R9 is redundant to R11; delete R9.
Yes
No
Referring to the second bullet under R1, Part 1.1, "...Facilities at voltage levels lower than the BES;" these facilities are not enforceable under the NERC Standards. Any such references should be removed. Editorial comment: remove M5 because there is no corresponding R5.
No
Referring to the Moderate and High VLSs for TOP-001-2 Requirements R3, R5, R6 and R8, where these VLSs state "...more than x% or less than or equal to y%...", suggest changing to "...more than x% and less than or equal to y%...". These changes would also make these VLSs consistent with the language of TOP-002-3 and TOP-003-2.
Individual
Thad Ness
American Electric Power
No

The draft of R6 states that "Each Transmission Operator, Balancing Authority, and Generator Operator shall notify the Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetry, control equipment and associated communication channels between the affected entities." The assessment and dissemination of GOP info to the "affected entities" should be the responsibility of the local TOP and RC. It seems inappropriate to request that the GOP make these sorts of contacts, as GOPs would lack the necessary BES info to make a determination as to who should be notified.

Yes

Yes

Additional clarity is needed as to the type(s) of data that would be considered necessary for performing operational planning analysis and real time monitoring. For example, will the requirements as specified in attachment 1 for TOP-005-2 be incorporated into TOP-003-1?

Yes

AEP appreciates the work of the drafting team to make the language more concise for this standard.

Individual

Larry Grimm

Texas Reliability Entity

No

The statement "identified reliability directive" in R1 and R2, of standard TOP-001-2, would be better changed to "reliability directive." The word "identify" requires action and the standard does not specify how the "identifying " will be done. Furthermore, if the TOP is issuing a directive, it should be assumed that the directive is a Reliability Directive unless the TOP states that it is not. This position saves time when time is of the utmost importance. The proposed wording as presented will open the door for deliberation when corrective action should be well underway.

Yes

Yes

Yes

Group

Electric Market Policy

Connie Lowe

No

Dominion reads R1 to require an entity to 'carry out' the Reliability Directive. In order to comply with the requirement it must either take actions as prescribed in the Reliability Directive or it must inform the TOP that it can't do so for one of the following: safety, equipment, regulatory or statutory requirements. It is Dominion's expectation that an entity may know whether it has safety, equipment, regulatory, or statutory conflicts with the Directive at the time the Reliability Directive is issued, but this may not always be the case (This is especially true where the Reliability Directive is issued to personnel in a control center as opposed to being directly communicated to the operator of the Element or Facility.) Regardless, whenever an entity determines it can't comply with the Reliability Directive, it must make notification or be non-compliant with R1. When the Reliability Directive has a time component and the entity doesn't comply with the time required, it is non-compliant if it hasn't completed the action(s) required unless it notified the TOP before the time component of the Reliability Directive expires (citing one of the following; safety, equipment, regulatory, or statutory requirements.) This time element guidance is not provided with this standard.

No

Dominion is unsure as to which version (clean or redline) of the language in the grey box (for R1) the SDT intended. The sentence (in red line version) appears to read "Rationale for Requirement R1:

Operational Planning Analysis (OPA) does not the analysis even if those tools are not available." Please clarify. We also did not find any changes to the Data Retention (red line version).

No

Is this question meant to refer to TOP-003-2? If so, then Dominion's response is that we agree, but do not see why the SDT felt it necessary to add "web postings with acknowledgement" to M2 and M3. The sentence "Such evidence could include but is not limited to ....." was sufficient without the addition. Dominion believes this language will invite others to want to add the types of evidence found usefher may grow over time.

Group

Western Electricity Coordinating Council

Steve Rueckert

Yes

Yes

Yes

No

These same comments were submitted with our vote on the non-binding VRF and VSL poll WECC agrees with the VRFs and the majority of the VSLs. However, we beleive consideration of the following will improve the VSLs. TOP-001-2 R6: Clarification of the language and intent of Requirement R6 and the VSLs for R6 is needed. For example, it is difficult to determine if the Lower VSL for R6 is based on the responsible entity not notifying every negatively impacted entity of outages of equipment between the TOP and one (or 5%) affected entity, or if it is based on not telling one (or 5%) negatively impacted entity of outages. The same confusion exists in the remainder of the VSLs for R6. TOP-003-2 R1: The VSLs to not appear to address the situation where the responsible entity did not include three or more of the required elements of the documented specification for the data necessary for it to perform its required Operations Planning Analyses and Real-time monitoring, but still had a documented specification. TOP-003-2 R4: The binary Severe VSL for R4 seems harsh. A responsible entity receiving a specification in Requirement R2 or R3 could have conceivably satisfied 99% of the obligations of the documented specifications for data and yet with this binary VSL, they would still be facing a Severe violation. Why are there not percentage graduations as in the other VSLs?

No additional comments

Group

BC Hydro

Patricia Robertson

Yes

Yes

No

R1.1 refers to "Operating parameters for BES Facilities and Facilities at voltage levels lower than the BES". In the previous Consideration of Comments, it was noted that "Facilities below 100kV may have material impact to the BES and, as such, are within the scope of the requirement ...". BC Hydro feels that the wording in R1.1 "Facilities at voltage levels lower than the BES" is open-ended and it does not clearly reflect that these extra Facilities have been deemed as having material impact to the BES and therefore are subject to the NERC MRS.

Group
Progress Energy
Jim Eckelkamp
No
No
TOP-002-3 R2...Our initial concern was that an auditor could read this requirement as requiring a specific plan to address each IROL and SOL. This interpretation does not make much sense, but it is supported by the wording of the measure, which says, "Such evidence could include but it is not limited to plans, processes, or procedures for precluding operating in excess of each IROL and each SOL." We can picture an auditor going down a complete list of IROLs and SOLs and asking, where is your plan for A, where is your plan for B, etc. The standard should not require the Transmission Operator to prepare a plan to address IROLs and SOLs unless the Operational Planning Analysis indicates the potential for a thermal or voltage problem for that element due to normal (N-0), contingency (N-1), or sensitivity analysis result. So, the logical way to read this requirement is to say that the completion of the Operational Planning Analysis is the "plan", and if there are no IROL/SOL limits exceeded, then you have met the requirement. If this is what the SDT meant, then the wording of the requirement should be revised and clarified. Also, We are concerned about the requirement to "...plan to preclude operating in excess...", because "preclude" is defined to mean "make impossible" or "take action in advance to make impossible". Precluding these events is inconsistent with the time limits established in the new TOP-001-3 standard. This could be read to require pre-contingency action for any contingency involving an IROL/SOL, which could cause major operational problems to say the least. All of the prior standards, including the TOP, TPL, and the Rules of Procedure governing the seasonal assessment process provide latitude in how studies are performed, and what pre- and post- contingency actions are taken. This standard should be clarified to provide comparable latitude in addressing IROL and SOL issues. Just changing "preclude" to "mitigate" would be a good start.... Also, requirement R2 is unacceptably vague in that it requires plans for SOLs that "support internal area reliability" without indicating how those SOLs are identified or selected as a subset of all SOLs. Also, R8 of TOP-001-3 requires that the RC be notified of the existence of these SOLs, whatever they are....
No
We perform many studies in different time frames that could be viewed as an "Operational Planning Analysis", from seasonal assessments, to OPC studies, to outage planning studies, day-ahead planning studies, real-time CA studies, etc. Our question is, which of these studies will be subject to all of the requirements in TOP1,2,3, and particularly to the data specification requirements in TOP-003? Will Transmission Operators be expected to meet these requirements for ALL studies, or can we designate one specific study process as the "Operational Planning Analysis" study (and, by implication, exempt others from the requirements). Also, TOP-003, R1 also includes "real-time monitoring" in the scope of the requirement for the data specification, so does this include the EMS and all of its data? This would require multiple data specifications, because the EMS and off-line PSS/E models we use to perform various studies would require different data specifications, have different contacts that provide information, etc.
Group
Public Service Enterprise Group LLC
Mikhail Falkovich
No
The PSEG Companies interprets "long term outages" to be planned season outages not emergent issues that result in a long duration outage of a BES facility.

Group
Wisconsin Electric Power Company
Jim Keller
No
R3 add to the requirement that the TOP will inform impacted Balancing Authorities. R4 it is unclear what is the nature of the emergency assistance that a TOP has available? I can understand a Distribution Provider shedding load, or a Generator Operator starting a generator or reducing output of a generator, these are not types of action a TOP may offer to others. R6 has the GOP notifying negatively impacted interconnected NERC registered entities, we do not support a GOP notifying anyone other than its RC, BA, and TOP. GOP should be removed from this requirement. In addition the phrase "negatively impacted interconnected NERC registered entities" is not clear enough to focus the notification on near term operations. R10 should add to the requirement that the TOP will inform impacted BA's of its actions R3 & R5 we think the subtle difference does not warrant separate requirements, the emergency in a TOP area vs conditions in a TOP area causing an Adverse Reliability Impact on another's area, hence an emergency there is somewhat circular.
No
R3 the TOP should provide the plan to its RC and BA (s) in addition to notifying other entities of expected actions. The use of the phrase "all registered entities" is too open ended, and not limited to operational functions as it should be. In addition some actions may be required of entities not registered.
No
R2 & R3 should not use the term monitored, the TOP or BA should distribute its data specification to all entities that are included in that specification to enable the proper Operational Planning Analyses and Real-time monitoring. R4 should not include both asset owners and operators, example generator xyz net output at the transmission interface needs to be the responsibility of one and only one entity to provide. Very confusing if both the GO and GOP have the same responsibility.
Group
NIPSCO
Joe O'Brien
The new standard appears to treat SOLs and IROLs in a similar manner, which should not be the case. Also, in TOP-003-2 R1 1.1 the second bullet may incorrectly bring non-BES distribution facilities into play.
Individual
Joe Petaski
Manitoba Hydro
Yes
The term 'reliability entity' used in TOP-001-02 should be changed to 'registered entity'.
Yes
Yes
Yes
Group

Luminant Power
Mike Laney
Yes
Yes
No
While we agree with the concept of the TOP and BA creating a specification for data necessary for Operational Planning and Real-time monitoring, we feel that Requirement 1.2 should explicitly state that the format should be mutually agreeable to the TOP and BA and the parties receiving the data request under R2 and R3. Additionally, for R1.3, we feel the same mutually agreeable requirement between the TOP and BA and the parties receiving the data request should apply be added for the periodicity requirement.
Yes
Individual
Jim Howard
Lakeland Electric
No
TOP-001-2 Coordination of Transmission Operations R5 seems to limit communications / coordination more than the version 1 standard (old R7) to only those actions that can result in an Adverse Reliability Impact, which are very few. This is probably underperforming and FERC will probably not like it. Some other limits to the scope of communications, such as "Each Transmission Operator shall inform neighboring other Transmission Operators of its operations of Bulk Electric System Facilities known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas unless conditions do not permit such communications. Such operations may include relay or equipment failures and changes in generation, Transmission, or Load." I disagree with deleting TOP-008-1 R3 that allows TOPs, after exhausting other methods to alleviate the problem, to open a Facility if it is imminent danger of catastrophic failure. The requirement should be revised and included in TOP-001-2 as something like the TOP shall request permission of the RC to disconnect the Facility if there is a threat of imminent catastrophic failure, the RC can direct otherwise "unless the direction per Requirement (IRO-001-2) R2 can not be implemented or such actions would violate safety, equipment, regulatory or statutory requirements" (IRO-001-2, R3). Exceeding an IROL that might result in a system restoration event with equipment capable of being restored is preferable to waiting for a Facility to be disconnected due to catastrophic failure, still exceeding the IROL due to that disconnection, but resulting in a system restoration exercise with catastrophically failed equipment. An example of this is the 1977 blackout of NYC which was exacerbated by catastrophically failed equipment. On R7 and R9, I'm concerned about the "for how many contingencies" question, e.g., are we held to the same criteria for "extreme contingencies"? The BAL standards have exclusions for multiple contingencies in meeting the performance requirements (e.g.,BAL-002-0 D1.4). There is not such consideration for "Extreme" contingencies in R7 and R9. If a bad event occurs beyond the criteria we operate the system to, are we setting ourselves up for failure and fines?
No
TOP-002-3: Operations Planning The prior version 2 standard was applicable to both the BA and the TOP. The new standard is just the TOP, which is appropriate; however, it was the old TOP-002-1 that basically required the BA to validate the unit commitment of resources to ensure enough capacity is committed (at least that's how I interpreted R5, R6 and R7 of the version 2 standard and how they would apply to a BA). Since BAs are eliminated from the new version 2 standard, and since there is no similar requirement in the BAL standards that I am aware of, FERC will likely see a reliability gap that no entity is ensuring that enough generation is being committed to serve current day / next day peak loads, e.g., no entity seems to be responsible for validating unit commitment. The SDT claims that BAL-001-1 covers the operations planning perspective of a BA, but, BAL-001-1 covers unit commitment only loosely on an annual or monthly basis. The new version also doesn't talk about the

time frame of operations planning. The old version clearly had current day, next day and seasonal operations planning requirements that probably ought to be retained, as opposed to the ambiguous phrasing of R1.

No

TOP-003-3: R1 - in general, "data necessary for it to perform its required Operational Planning Analysis and Real-time monitoring" is more ambiguous than the many requirements it replaced, and will probably be perceived by FERC as being too flexible a requirement that would allow a TOP or BA to do less than they are currently required. It may be beneficial to include a statement something like "including but not limited to:" and then include a bullet list of all the requirements it replaced in the prior version of the TOP standards to at least prove to FERC that we are not subtracting data/information requirements. R1.1, second bullet - although there is certainly a need to describe "operating parameters for BES Facilities and Facilities at voltage lower than the BES" there are two problems with the statement: 1. Facilities by definition are part of the BES, e.g., NERC Glossary defines Facility as: "A set of electrical equipment that operates as a single Bulk Electric System Element ....". The second use of Facilities in the phrase ought to be deleted (see below), or at minimum, replaced with the term Elements. 2. Although there is certainly a need to describe operating parameters for non-BES equipment, there is no need to regulate that activity through the standards as it has no bearing on BES reliability. R1.2 "mutually" agreeable - who is mutually agreeing? R1 seems to imply the BA and TOP, but, the intent seems to be more in line with the entities described in R4, the BA, GO, GOP, IA, LSE, TOP, and TO. Suggest clarifying who is mutually agreeing. Also, from a reliability related perspective, the TOP and BA needs to have final say if the entities cannot agree as a "backstop" provision. Suggest adding a stakeholder process something like what is in PRC-006-2 R14. R1.3 and R1.4 - should have the same characterization of R1.2, e.g., "mutually" or stakeholder process driven to establish a schedule.

Yes

Individual

Greg Rowland

Duke Energy

No

• We disagree with the revised definition of Reliability Directive. The phrase "or expected" creates compliance uncertainty and should be struck. • R8 - We have made this comment before and continue to strongly believe that the phrase "supporting its internal area reliability" should be replaced with the phrase "having an Adverse Reliability Impact". In the Consideration of Comments the drafting team acknowledges that the intent of the requirement is to allow a TOP to go beyond what is needed to support BES reliability, and address local load concerns. We believe such a requirement has no place in a mandatory reliability standard, because an entity can always do more than what is required. The inclusion of the concept of "supporting internal area reliability", creates compliance risk which we believe is unnecessary and is not supported by Section 215 of the Federal Power Act. Auditors could potentially find an entity non-compliant if no SOLs have been identified as "supporting its internal area reliability", a nebulous and undefined term. Consistent with our argument on this requirement, we also question how the drafting team was able to justify a "Medium" VRF. It very clearly doesn't meet the guidelines. • R9 – The VRF has been changed from "High" to "Medium". Consistent with our previous comment on R8, we question how the drafting team was able to justify a "High" or "Medium" VRF. It very clearly doesn't meet the guidelines. • R11 – Including the SOLs identified in R8 in this requirement effectively makes those SOLs equivalent to an IROL for mitigation purposes. Consistent with our comments above on R8 and R9, our concern is that under this approach all equipment ratings could potentially become SOLs subject to the same mitigation as IROLs.

No

• This standard uses the capitalized term "Operational Planning Analysis" which is not currently a NERC defined term. How is this to be applied in the standard? • R2 – We reiterate our comments on TOP-001-2 regarding the problematic phrase "supporting its internal area reliability". Will an entity's Operational Planning Analysis be found deficient if no SOLs have been identified which support "internal area reliability"? We believe that it is certainly possible. Furthermore, in M2, what evidence will be required to be presented to demonstrate that an entity has no SOLs which "support internal

area reliability"? • R3 – insert the word "NERC" before the word "registered" to add clarity.
No
The second bullet under R1.1 has been changed so that now operating parameters for all facilities at voltages lower than BES are required. The phrase "at the discretion of the Transmission Operator or Balancing Authority" must be restored in this requirement.
No
Consistent with our comments about the unacceptable phrase "supporting local area reliability" we do not support the VRFs and VSLs.
Individual
Rex Roehl
Indeck Energy Services
Yes
Yes
No
TOP-001-2 R6: The VSL's do not consider the case of a small GOP (and possibly DP or LSE) which only affects the TOP or BA. The VSL needs to reflect the significance of the planned outages. Planned outages of wind projects is of lower reliability significance than of large base load plants or black start units. The SDT needs to define the differences. Planned outages on GOP facilities that exceed the NERC Reportable Disturbance threshold for the BA would be Severe. Those between 75% & 100% of Reportable Disturbance would be High. Those between 50% and 75% of Reportable Disturbance would be Medium and all others would be Lower. TOP-003-2 R4: Only having Severe VSL avoids the difficult process of deciding what data is important. Data on outages of wind projects is of lower reliability significance than of large base load plants or black start units. The SDT needs to define the differences. Data on facilities that exceed the NERC Reportable Disturbance threshold for the BA would be Severe. Those between 75% & 100% of Reportable Disturbance would be High. Those between 50% and 75% of Reportable Disturbance would be Medium and all others would be Lower.
Individual
Darryl Curtis
Oncor Electric Delivery
No
For R6- Oncor does not believe that the proposed language will provide a coordinated communication effort in the event of a planned outages of telemetry, control equipment and associated communication channels. In addition, the term "negatively impacted interconnected registered entities" is 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.
Yes
Yes
Yes
Individual
Don Schmit
Nebraska Public Power District

No
NPPD does agree in general with the intent of the proposals under this ballot, however there is change needed in TOP-002-3. The language in TOP-002-3 R2 is not clear and could be interpreted to require an entity to include all IROL's in the interconnection, which is way too broad. NPPD suggests that R2 of TOP-002-3 be reworded to be clear that the requirement is addressing IROL's and SOL's "within the Transmission Operator's Area".
Individual
David Thorne
Pepco Holdings Inc
Yes
Should the standard be applicable to a TO? Specially it would appear that R1 and R2 should be applicable to a TO in addition to the other listed entities.
Yes
No
In R1.1 has an open ended requirement for operating parameters for non BES facilities. Should the language limit that to only those facilities that have an impact on BES facilities? If so, should long term outages of those facilities also be required?
Yes
Individual
Kirit Shah
Ameren
No
(1)We do not agree with the definition of "Reliability Directive". The phrase "expected" Emergency creates uncertainty and will create controversy. We suggest to remove the "actual or expected" phrase, and instead add "... condition or situation that threatens the reliability of the Bulk Electric System and is likely to lead to cascading, separation, islanding, ...." after emergency consistent with the intent of the FPA and NERC Standards. (2) In R2, the SDT uses the adjective "identified" which, in the Compliance and Enforcement arena, unfortunately may imply a new and different type of Directive (an "identified Reliability Directive"). We assume the SDT meant to imply with the word "identified", that the TOP would let know the receiving party explicitly that the communication that they were receiving was in fact a Reliability Directive and not just some other form of operating communication. IF that is the case, we suggest that the SDT simply state that fact as follows, "A Directive issued by a TOP which is referred to in the ensuing 3-way communication with the recipient of that Directive using the specific words Reliability Directive". (3)In R6, we have concerns with the Generator Operator having to "notify negatively impacted interconnected NERC registered entities of planned outages of telemetry..." etc. This is too broad for a GOP to be lumped in with the TOP and BA, since most GOPs do not have the knowledge if these planned outages would negatively affect other NERC entities. We believe that R6 should apply to TOP and BA, and maybe have R6.1 that requires the GOP to notify their specific TOP and BA of planned outages of telemetry, control equipment, and communication channels which in turn would generate communication from the host TOP and BA to others so affected. (4) In R8, what is meant by "internal" area reliability? We have a significant concern form a compliance perspective about how would it be interpreted and audited. (5) R11 refers to R8 and SOL. Is it the intent of the SDT to consider SOL effectively the same as IROL for purpose of this requirement?
No
(1)R1 refers to "Operational Planning Analysis" which is not a defined term. Similarly, R3 uses the

phrase "registered entities identified in the plan(s) cited in R2 which is confusing. Please define/clarify these terms or phrases. (2) In R2 (similar to R8 in TOP-001-2) , what is meant by "internal" area reliability? We have a significant concern from a compliance perspective about how would it be interpreted and audited.

No

In R1, 1.1 "at the discretion of the Transmission Operator or Balancing Authority" phrase should be reinstated.

No

As stated in comments above, we have concerns about the newly introduced term "internal" area reliability in TOP-001 and TOP-002 and proposed Medium VRF to the corresponding requirements.

Group

Bonneville Power Administration

Denise Koehn

Yes

Yes

Yes

No

TOP-003-2: The proposed sanctions seem disproportionate to the offense. If a BA fails to contact an entity that influences its operation, the failure does not seem to affect anything except the evaluation's accuracy to the offending BA. Furthermore, it seems unlikely that a deliberate omission would be made since it's in a BA's best interest to have accurate assessments. TOP-001-2 R6: Clarification of the language and intent of Requirement R6 and the VSLs for R6 is needed. For example, it is difficult to determine if the Lower VSL for R6 is based on the responsible entity not notifying every negatively impacted entity of outages of equipment between the TOP and one (or 5%) affected entity, or if it is based on not telling one (or 5%) negatively impacted entity of outages. The same confusion exists in the remainder of the VSLs for R6. TOP-003-2 R1: The VSLs to not appear to address the situation where the responsible entity did not include three or more of the required elements of the documented specification for the data necessary for it to perform its required Operations Planning Analyses and Real-time monitoring, but still had a documented specification. TOP-003-2 R4: The binary Severe VSL for R4 seems harsh. A responsible entity receiving a specification in Requirement R2 or R3 could have conceivably satisfied 99% of the obligations of the documented specifications for data and yet with this binary VSL, they would still be facing a Severe violation. Why are there not percentage graduations as in the other VSLs?

Group

Imperial Irrigation District

Jesus Sammy Alcaraz

Yes

R5 - should include notification of the Reliability Coordinator involving Adverse Reliability Impact M1 (b) - did not comply with the indentified directive and informed the Transmission Operator that such actions would violate safety, equipment, regulatory, or statutory requirements, in accordance with Requirement R1. M5 – include the notification to the Reliability Coordinator known or expected to result in an Adverse Reliability Impact Transmission Operator Areas with those Transmission Operators in accordance with Requirement R5

Yes

Yes

Suggestions/Comments: Could R2 & R3 be included as sub bullets of R1 (R1.1 & R1.2)? R1 - Each Transmission Operator and Balancing Authority shall have create and maintain a formal documented

plan/procedure for the data necessary for it to perform its required Operational Planning Analyses and Real-time monitoring. R2 - Each Transmission Operator shall distribute its formal data plan/procedure specification to the Reliability Coordinator and entities that have Facilities monitored by the Transmission Operator and to entities that provide Facility status to the Transmission Operator. R3 - Each Balancing Authority shall distribute its formal data plan/procedure specification to the Reliability Coordinator and to entities that have Facilities monitored by the Balancing Authority and to entities that provide Facility status to the Balancing Authority.

No

IID staff and SME are supporting WECC position and providing those comments below. TOP-001-2 R6: Clarification of the language and intent of Requirement R6 and the VSLs for R6 is needed. For example, it is difficult to determine if the Lower VSL for R6 is based on the responsible entity not notifying every negatively impacted entity of outages of equipment between the TOP and one (or 5%) affected entity, or if it is based on not telling one (or 5%) negatively impacted entity of outages. The same confusion exists in the remainder of the VSLs for R6. TOP-003-2 R1: The VSLs to not appear to address the situation where the responsible entity did not include three or more of the required elements of the documented specification for the data necessary for it to perform its required Operations Planning Analyses and Real-time monitoring, but still had a documented specification. TOP-003-2 R4: The binary Severe VSL for R4 seems harsh. A responsible entity receiving a specification in Requirement R2 or R3 could have conceivably satisfied 99% of the obligations of the documented specifications for data and yet with this binary VSL, they would still be facing a Severe violation. Why are there not percentage graduations as in the other VSLs?

1. The proposed versions of the standards appear to remove the redundancy and provide better clarity to the requirements. However the period when the proposed standard becomes effective is cumbersome. PROPOSED - Suggest two effective dates be provided? For example: Regulatory approval 05/01/2011 Effective Date 10/01/2013 Effective Date "Not Requiring Regulatory Approval" 10/01/2013 CURRENT - Effective Date: All requirements will become effective the first day of the first calendar quarter twenty-four months following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, the requirements become effective the first day of the first calendar quarter twenty-four months following Board of Trustees adoption. 2. Recommend that the RSAWS for these proposed standards be revised and posted when the standard versions become effective. 3. Data Retention – Could the Data Retention be displayed in a matrix format (see example below) EXAMPLE Function Requirement Evidence Retention Period TOP R1 Compliance with RC Directives Current Year + Previous Year BA R2 Compliance with TOP Directive Current Year + 1 Year GOP R3 Compliance with TOP Directive Current Year + 1

Individual

Anthony Jablonski

ReliabilityFirst

Yes

Yes

Yes

No

ReliabilityFirst generally agrees with the Violation Risk Factors (VRFs) but disagrees with the Violation Severity Levels (VSLs) for the following reasons: TOP-001-2 VSLs 1. VSL for R2 a. The word "comply" is not within the language of R2 and should be removed from the VSL. R2 simply requires the Applicable Entities to "... inform its Transmission Operator...". This is a violation of the FERC Guideline 3: "Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement" 2. VSL for R8 a. The term "local area reliability" should be replaced with "internal area reliability" to be consistent with the language in R8. This is a violation of the FERC Guideline 3: "Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement" TOP-003-2 1. VSL for R1 a. The sub-parts should be referenced in the VSL. (i.e. "The responsible entity did not include one of the required elements, per Requirement R1, Parts 1.1 through Parts 1.4, of the documented specification...") b. There is no provision if an Applicable Entity fails to include three or more of the

required elements. VSLs should be gradated to include failure of including both three and four sub parts.
Individual
Denise Lietz
Puget Sound Energy
Yes
Yes
Yes
The second bullet in R1.1 needs clarification. As originally drafted, this was permissive language allowing entities to include non-BES information in their data specifications. However, with the revisions, this section now requires all entities to do so, whether or not such data is necessary or pertinent for their operations. As a result, the second bullet should be revised to retain its permissive character or should be removed from the standard altogether.
No
In TOP-001-2, R8, the time horizon should include Operations Planning and Same-day Operations, in addition to the currently-listed Real-Time Operations. In TOP-002-3, R3, the VRF is listed as "High". However, according to the document "Violation Risk Factor and Violation Severity Level Assignments", the appropriate level is "Medium", which is also more consistent with the assignments associated with other requirements throughout these proposed standards. In TOP-002-3, the VSL matrix entries associated with R3 need to have additional references to "reliability entities" changed to "registered entities".
Group
Southern Company
Antonio Grayson
No
It would be preferable to use the term "reliability entities" or at least replace the generic term "registered entities" with a listing of the Functional Model Entities that need to be notified. The use of registered entities would require reliability information to be given to marketing entities. R2 and M2 are confusing due to a mismatch in using "issued" and "identified". R2 lists the directive as "identified", while M2 lists it as "issued, identified, ". It is suggested that the following phrasing be used: "an issued Reliability Directive" or "an identified Reliability Directive". Please consider merging R1 and R2 into a single requirement that requires entities to comply with directives or provide a reason to the TOP as to why it's unable to do so. Then, the measure could be that an entity either complied with the requirement or informed the TOP of its inability to comply. I think R2 implies that there may be reasons other than safety, equipment, regulatory, or statutory restrictions that may prevent a Generator Operator from performing an identified Reliability Directive as it refers to the GOP's "inability" to perform the action and doesn't specifically reference these restrictions again. I agree with your comment that the best way to handle this would be to combine R1 and R2 into a single Requirement perhaps with the following wording: "R1. Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall comply with each identified Reliability Directive issued by its Transmission Operator, unless the respective entity is unable to perform the actions required by the Reliability Directive (due to violation of safety, equipment, regulatory, or statutory requirements or other reasons) and informs its Transmission Operator upon recognition of its inability to perform the actions. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-day Operations, Real-Time Operations]" For R2, The question came up for what was more appropriate – issued or identified, and requested Reliability Directive was also suggested as an option. If the reason for this descriptive term is to clarify that the Transmission Operator has declared "this is a Reliability Directive", then identified would be the more appropriate descriptive term and should be used in a consistent manner. For R6, we take issue with changing the wording from "telemetry equipment" to telemetry as the former is equipment and the latter implies data. The distinction is that

under the current wording, the entity is required to coordinate the outage of the piece of equipment that telemeters data (i.e. the RTU) whereas the proposed change implies that the entity will have to coordinate any outages of telemetered data. This could have significant implications as there may be 1000+ data points being telemetered by an RTU, and each data point may come from a unique piece of equipment in the plant. Is the intent that removal of, say, a pressure transmitter or a MW transducer from service for routine calibration requires notification to the Reliability Coordinator? For R6, Fleet Operations functioning as Generator Operator does not directly notify the RC, but interfaces instead with the PCC. Forwarding rules in GENcomm will deliver notifications to the RC. This impacts the evidence for M6, if the expectation is a direct communication. For R6, The use of a comma after "control equipment" in the list in R6 would make it easier to understand this requirement. (suggestion: make it match to M6). For R9, this is a duplicate requirement and does not add to reliability. This requirement is addressed in TOP-004-2 R1. For R10 and R11, these are duplicate requirements and do not add to reliability. These requirements are addressed in TOP-007-0.

No

R1 -It is still unclear to us if Operations Planning Analysis includes Contingency analysis as the NERC Glossary does not explicitly state. Edits to the rationale box were such that we could not understand the intent. R3-Is the standard expecting a comprehensive written plan as a result of the planning that takes place in R2? Is the intent of this requirement to notify all registered entities that may be affected by a mitigation plan for the next day? 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. It would be preferable to use the term "reliability entities" or at least replace the generic term "registered entities" with a listing of the Functional Model Entities that need to be notified. The use of registered entities would require reliability information to be given to marketing entities.

Yes

Yes

(Please note that these comments relate to TOP-001-2). It is suggested that the R1 VSL Severity text be written as an either/or statement. "entity either did not comply with (a directive) or did not inform ...." R1, as its currently written, gives an entity these two choices. The R2 VSL Severe test is more expansive than Requirement 2. To match R2, it is suggested that the test read " ...entity did not inform the TOP of its inability to comply" The R6 graduated VSLs, as written, are hard to understand. For a given outage, it is unclear how many "affected entities" there are likely to be. Also for R6, the OR statement has conflicting scope (i.e. planned outage of telemetry OR with planned outage of telemetering equipment).

Individual

Jennifer Eckels

Colorado Springs Utilities

No

Colorado Springs Utilities appreciates the opportunity to comment on this draft and the changes made to this standard. The following comments are specific to requirements R3,R4, R8/R10,R9, & R11. R3. By changing "of" to "by" there is now no object to the verb "inform". Suggested language: "Each Transmission Operator shall share its assessment of its Operational Planning Analysis with its Reliability Coordinator, and all other Transmission Operators that are known or expected to be affected, based on that assessment, by actual and anticipated Emergencies." R4. Colorado Springs Utilities agrees with those who have commented on previous drafts that the language strongly implies that the TOP rendering assistance is obligated to ensure the entity receiving assistance has implemented "comparable emergency procedures." We recommend the requirement be rewritten: "Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory, or statutory requirements. The Transmission Operator requested to provide such assistance may require that the requesting entity first implement its own comparable emergency procedures." R8/R10. SOLs, which are not IROLs, by definition, do not impact interconnection reliability and should be the responsibility

of the TOP, not the RC, and therefore should not require being reported to nor monitored by the RC. R9. Does R9, as written, prevent the TOP from employing the option to permit equipment life reduction to avoid load shed? R11. Despite the SDT's clarifying comments provided during previous comment periods, this requirement continues to appear duplicative to R7 & R9 and seems to provide opportunity for double jeopardy in the event of non-compliance with one of those requirements. We suggest R11 be eliminated. If exceeding the SOL or IROL is remedied and restored within the required time frame, then the operator or the system has taken appropriate mitigating action.

Yes

Colorado Springs Utilities respects the difficulty in crafting language which satisfies all potential interpretations of a requirement. We do, however, suggest changing "planning to preclude operating" under R2 to "plan to operate", giving you the following: "Each Transmission Operator shall plan to operate within each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator via the Operational Planning Analysis performed in Requirement R1 as supporting its internal area reliability." Perhaps the definition of SOL should be revised to include the principle of "internal area reliability". Then, everything not IROL or SOL could go back to being facility ratings or the like.

Yes

Colorado Springs Utilities believes the question should be directed toward TOP-003-2.

No

TOP-001-2 R8 & R9 VRFs should be "Low" TOP-002-3; R2 - IROLs should be "High" / SOLs should be "Low". R3 should be "Medium".

Individual

Russell A. Noble

Cowlitz County PUD

No

Cowlitz respectfully disagrees with the SDT concerning requirements R1 and R2 addressing priori prohibitions and post-agreement to comply with an identified Reliability Directive. Cowlitz can see no Reliability difference between an immediate "piori" and post-agreement identification of a TOP Reliability Directive action that would violate safety, equipment, regulatory, or statutory requirements. In each case the outcome is the same: the action is not complied with due to an inability to perform, and the TOP is informed "upon recognition." Therefore R1 and R2 are effectively duplicitous in this regard. Cowlitz suggests that the verbiage "...the respective entity informs its Transmission Operator that..." be removed from requirement R1. Cowlitz agrees with the SDT concerning "Reliability Directive" is not meant to equate to the urgency of a situation. This standard establishes the authority of the TOP to issue directives, and clear communication of such authority has been requested by this commenter in the past. Cowlitz applauds the SDT's stand on this issue. On all other matters, Cowlitz either agrees or abstains with the SDT.

Yes

As long as System Operating Limits (SOLs) are tied specifically to Bulk Electric System facilities by other standards, Cowlitz approves of all the changes.

No

Cowlitz has no disagreement with any of the changes made; however Cowlitz struggles why the Load-Serving Entities (LSEs) are included in the Applicability section. From requirements R2 and R3 it is clear that Facility monitoring and status is involved. From the Reliability Functional Model it is clear that LSEs do not own Facilities, but rather are more ambassadors between the End-use Customers and registered entities that do own facilities. Although the Statement of Compliance Registry Criteria implies that the LSEs might own UVLS and/or UFLS equipment, the Reliability Functional Model is clear that the LSE only helps identify those critical customer loads that should be excluded in such load shedding programs. Therefore, Cowlitz urges the SDT to remove the LSEs from the Applicability section. Cowlitz also suggests that Distribution Providers be included in the Applicability section as these entities do own Facilities that may require monitoring and status by the TOP and BA.

Yes

Individual
Jason Snodgrass
Georgia Transmission Corporation
Yes
Yes
No
Section 215 of the FPA provides that the ERO “shall have authority to develop and enforce compliance with reliability standards for only the BPS.” In Order 743A, the commission acknowledged that “Congress has specifically exempted ‘facilities used in the local distribution of electric energy’ from the BPS definition. R1.1 for TOP-003-2 references distribution assets which are outside the scope of NERC standards. GTC recommends removing reference to “Facilities at voltage levels lower than the BES”
Individual
Bill Keagle
BGE
Yes
Comment on proposed TOP-001-2 Reliability Directive definition: Reliability Directive - A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency. This needs to also include: The RC, TOP or BA must clearly state that “This is a Reliability Directive” .
No comment.
No comment.
No comment.
No comment.
Individual
David Kiguel
Hydro One Networks Inc.
No
In Requirement R2, there is a need to specify how much time should be allowed to “inform its Transmission Operator upon recognition of its inability to perform an identified Reliability Directive issued by that Transmission Operator.” Suggest rewording R2 to read: Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall immediately inform its Transmission Operator of its inability to perform a Reliability Directive. In Requirement R4, we suggest the following rearrangement of the sentence to improve readability: R4: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory, contractual or statutory requirements, and provided that the requesting entity has implemented its comparable emergency procedures. The requirements (R9, 10 and 11) that stipulate returning SOLs which “have been identified as supporting internal area reliability” within 30 minutes should be modified to allow the TOP and RC to determine the appropriate timeframe for correcting such limits. The maintenance of Interconnection reliability and Bulk Electric System integrity is paramount, and global specifications may or may not be appropriate for a local area. Suggest modifying the appropriate wording to: within a specified time not to exceed the timeframe specified by the TOP. R9 is redundant to R11; we suggest deleting R9.
Yes
No

Referring to the second bullet under R1, Part 1.1, "...Facilities at voltage levels lower than the BES;" these facilities are not enforceable under the NERC Standards. Any such references should be removed. Editorial comment: remove M5 because there is no corresponding R5.
No
Referring to the Moderate and High VSLs for TOP-001-2 Requirements R3, R5, R6 and R8, where these VSLs state "...more than x% or less than or equal to y%..."; we suggest changing to "...more than x% and less than or equal to y%...". These changes would also make these VSLs consistent with the language of TOP-002-3 and TOP-003-2.
Group
FirstEnergy
Sam Ciccone
No
We have the following comments and suggestions: 1. R3 – Since this requirement is describing actions to be taken in Real-time as shown in the Time Horizon, the use of the term "Operational Planning Analysis" may not be appropriate. This is because an analysis in the operations planning timeframe is restricted to next day and up to 12 months in the future. We suggest that the team reconsider of the use of this phrase and remove the last part of this requirement, specifically remove "based on its assessment of its Operational Planning Analysis". 2. R6 – We do not agree with the phrase "and negatively impacted interconnected NERC registered entities". We believe that it should be the responsibility of the Reliability Coordinator to notify all impacted entities since they are afforded the wide-area view of the area. 3. R6 – The phrase "control equipment" is too broad and lacking clarity with regard to the phrase "between the affected entities". We suggest that additional clarification be added by providing examples of the types of control equipment or the loss of functionality that could occur due to the outage.
Yes
We support the requirements but have alternate wording suggestions for R2 as follows: "R2. Each Transmission Operator shall not operate in excess of each Interconnection Reliability Operating Limit (IROL) and each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1."
No
R1 – Subpart 1.1, Bullet #2 – We suggest that the team strike the phrase "and Facilities at voltage levels lower than the BES". NERC reliability standards are meant to provide an adequate level of reliability to the Bulk Electric System, and therefore non-BES requirements are beyond the scope of the standards. Furthermore, the current NERC initiative to revise the definition of BES and provide specifics around what is both included and excluded will alleviate any potential gaps in reliability of the BES.
No
We cannot support the current VSL until our suggested changes to the requirements are made.
Group
City of Tacoma or Tacoma Public Utilities
Chang Choi
Yes
1. The Standard Development Roadmap, page 2, states there are no new or revised definitions yet there is a revised definition for "Reliability Directive." Reliability Directive is not listed in NERC's Glossary of Terms. 2. The terms "Operational Planning", "Same Day Operations" and Real-time Operations" need definitions that include a time horizon. 3. R1: The language is redundant with R2. Removing "...the respective entity informs its Transmission Operator that..." from R1 would eliminate the redundancy. 4. R5: New R5 language replaces the old language from TOP-001-2 R 7.3. Proposed: "Each Transmission Operator shall inform other Transmission Operators of its operations known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas unless conditions do not permit such communications. Such operations may include relay or

equipment failures and changes in generation, transmission or load." Existing R7, R.3: "When time does not permit such notifications and coordination, or when immediate action is required to prevent a hazard to the public, lengthy customer service interruption, or damage to facilities, the Generation Operator shall notify the Transmission Operator and the Transmission Operator shall notify its Reliability Coordinator and adjacent Balancing Authority, at the earliest possible time." Suggestion – Include language to identify the time requirement for communications including after-the-fact notifications. The purpose of the requirement is to inform, yet there is no associated timeframe. 1. R10: Similar to R5, this requirement also needs an associated timeframe to inform the RC, otherwise it's difficult to measure.

No

• R2: "Each Transmission Operator shall plan to preclude operating in excess of Interconnected reliability Limits (IROL) and each System Operating Limit (SOL) which, while not an IROL, has been identified as supporting its internal area reliability, as a result of the Operational Planning Analysis performed in Requirement R1." Suggestion - The statement in red is a double negative and difficult to follow. Rewrite this sentence to be a positive statement to avoid confusion, for example, "Each Transmission operator shall plan to operate within identified ..."

No

1. In general, the standard language as written is vague. 2. R1: Though a minimum list of required data may be construed as too prescriptive and may "stifle creativity and innovations," the absence of a pre-defined list will promote inconsistencies between entities and may risk an Auditor interpreting what data is needed for an "Operational Planning Analysis" differently from the utility. 3. R1.1: The term "long term outages" needs a definition. How long is "long term?" 4. R1.1: The term "operating parameters" also need a definition.

No

1. TOP-001-2: In general, when "failure to inform" results in VSL, the timeframe for informing needs to be defined. 2. TOP-002-3, R3: The VSL language for all levels is confusing. At the minimum, the percentages for should be consistent between Lower, Moderate, High and Severe. 3. TOP-003-2: Similar to TOP-002-3, the VSL language for all levels is confusing and should be consistent between VSL levels.

Comments: Please provide the definitions for new terms in the first version of the Standards. Once they have been introduced and/or the standard is undergoing a new revision – they could be removed to the Glossary for future reference.

Group

MRO's NERC Standards Review Forum

Carol Gerou

No

We disagree with the statement in R8 ". . . have been identified by the Transmission Operator as supporting its internal area reliability . . .". This statement puts an SOL on the same level as an IROL, which is not the intent of an SOL. The Transmission Operator should inform the Reliability Coordinator of IROL's that may impact the reliability of the BES, but not SOL's. R9 - We continue to believe that SOL's should not be a part of the TOP-001-2 standard. There are not identified timeframes in the NERC standards that apply to SOL's. There has been no basis for the 30 minute timeframe listed, as "generally accepted by the industry" is not a technical basis, and SOL's are often tied to thermal limits and other steps can be taken locally to offset the SOL. If SOL's must be included, a better subset must be defined excluding thermal limits with any time limits being clearly specified as a return time after the SOL limit was exceeded. An example definition might be "non-thermal SOL's are those facilities limited below their maximum thermal capability as a proxy to maintain BES stability." Including SOL's in R11 effectively makes them equivalent to IROL's for mitigation purposes. Consistent with our comments in R8 and R9, SOL's must either be removed from consideration, or more narrowly defined to the appropriate set of SOL's that directly impact the reliability of the BES (cause instability, uncontrolled separation, or cascading outages). The SDT should ensure that TOP-001 consistent with FAC-014-2 R2 concerning identification of SOLs.

No

believes that the boundaries are not identified in TOP-002-3 R2. For IROLs, the boundaries should be limited to the Registered Entities footprint.

No

As currently written, R1.1 could be interpreted to include all of the distribution facilities of a Registered Entity. It needs to be revised to include only the lower voltage facilities proven to impact the reliability of the BES. In R1.1, please clarify "long-term" as the term applies to outage of BES Facilities. What length of time must pass before an outage I is considered "long-term"? In R1.1, clarify "Operating Parameters" as the term applies to BES Facilities and those Facilities at voltages lower than the BES. We recommend that a list of required parameters be included within the Requirement. Recommend rewording R2 (and R3) as follows: "Each Transmission Operator shall distribute its data specification document to all NERC Registered Entities that provide Facility status to the Transmission Operator."

Group

LG&E and KU Energy

Brent Ingebrigtsen

No

While LG&E and KU Energy generally agrees with the changes that were made, we do not feel the standard is ready for balloting based on the following comments: R1 and R2 – In both requirements, notification of the TOP is required and appears to be for the same condition. If this is not so, the requirements need to be more specific regarding the reasons for notification. For example, R1 appears to require notification for specific conditions regarding violations of safety, equipment, regulatory or statutory requirements and R2 could be interpreted that after agreeing to and during the course of complying with a reliability directive, the entity was unable to do so. LG&E and KU Energy does not believe that these two requirements need to be separated. Moreover, to the extent there are duplicative requirements for the same issue, if a violation were to occur, an entity may be in violation of two requirements instead of one. The standards must clearly state what is required and must do so without creating duplicative or overlapping requirements or sub-requirements. As presently drafted, R1 and R2 create confusion as to what is required and could result in multiple self reports for the same potential violation and potentially additional penalties as a result of two violations for what appears to be the same issue. R3 – This requirement appears to be an operational planning requirement and may more appropriately be inserted in TOP-002-3. If it remains in this standard, we suggest the following wording: Each TOP shall inform its RC and all other TOPs that are expected to be affected by anticipated emergencies based on its operational planning analysis. LG&E and KU Energy thinks "assessment" is synonymous with "analysis"). We also believe that R5 is intended to cover real-time operations. The time horizons do not appear to match the requirement, i.e., Operations Planning. R4 – No comments R5 – LG&E and KU Energy recommend similar language to that in R3 for consistency and clarity, i.e., R3 has "all other transmission operators" and R5 has "other Transmission Operators". The requirement is unclear in describing who is responsible for informing whom, needs to be rewritten to clarify. R6 – What is meant by "associated communication channels"? Data or Voice or both? Is this not covered by the COM Standards? Additionally, please clarify what is intended by terms "negatively impacted interconnected NERC entities" and "control equipment" as used in proposed R6. R7 – No comments R8 – The use of Operational Planning Analysis in this requirement is not consistent with the Time Horizon of Real-time Operations. Based on the NERC definition Operational Planning Analysis is considered future looking (next-day through 12 months) this would exclude modification to SOLs made during Real-time Operations. SOLs utilized in Operational Planning Analysis are based on certain assumptions given forecasted conditions or historical data. Real-time operating conditions can vary drastically from these assumptions and there needs to be flexibility in modifying SOLs to account for these actual system conditions. R9 – The 30 minute duration is quite restrictive in resolving an SOL exceedance, especially for those that are considered to support internal area reliability. Does this apply only to actual SOL exceedances, or does it also include post-contingent SOL exceedances? LG&E and KU Energy feel the time limit should be at least 90 minutes for exceeding an SOL (especially for post-contingent SOLs), to allow for use of TLR procedures or other measures which often take more than 30 minutes to implement. There needs to be some flexibility in establishing Real-time Operations SOLs based on actual system conditions separate from the Operational Planning Analysis. R10 – Because the Time Horizon is "Real-time Operations" the SOLs communicated to the RC per this requirement should be the Real-time

Operations established SOLs, not the Operational Planning Analysis SOLs established in R8. R11 – The SOLs established in R8 deal with future looking Operational Planning Analysis, however this requirement deals with Real-time Operations. Need clarification about Real-time Operations SOLs and we suggest the time duration for SOLs exceedances should be at least 90 minutes as described in R9.

No

R1 – No comments R2 – The word “preclude” can be interpreted as “prevent”, which would mean that any exceedance of an IROL or SOL would be a violation, regardless of duration. Other wording, such as “avoid” should be considered. R3 – No comments

Yes

R1.1 - It is our understanding that bullets should be avoided in the requirements. R2 – No comments R3 – No comments R4 – No comments

No

The Time Horizons seem to be inconsistent with established NERC definitions. The VSLs need to be updated with language modified in the requirements

Individual

Michael Moltane

ITC

No

ITC thanks the SDT for their work, and believes this iteration of the standard contains improvements. However, we have the following comments and concerns. Regarding the definition of "Reliability Directive", we believe that a clarifier should be added to indicate that a Reliability Directive is "a communication initiated AND IDENTIFIED.....". The addition of the words "and identified" makes very clear that the initiating entity must identify a communication as a Reliability Directive, and thus triggering all requirements related to the Directive. Regarding R6: ITC is concerned with the requirement that impacted "NERC registered entities" be notified of certain conditions. This puts the operating personnel in the position of having to consult the NERC Registry every time an event or action covered in this requirement occurs. Recognizing that is is not an optimal use of our operating personnel, we believe that "NERC registered" should be struck and therefore the requirement would simply require notification of "...negatively impacted interconnected entities". Regarding R8: ITC is concerned that this requirement essentially raises SOL to the same level as an IROL, which of course they should not be. We also share DEC's concerns regarding this requirement that TOP actions for local reliability should not be in a mandatory reliability standard. To quote from the DEC submitted comments: "In the Consideration of Comments the drafting team acknowledges that the intent of the requirement is to allow a TOP to go beyond what is needed to support BES reliability, and address local load concerns. We believe such a requirement has no place in a mandatory reliability standard, because an entity can always do more than what is required. The inclusion of the concept of "supporting internal area reliability", creates compliance risk which we believe is unnecessary and is not supported by Section 215 of the Federal Power Act. Auditors could potentially find an entity non-compliant if no SOLs have been identified as "supporting its internal area reliability", a nebulous and undefined term. Consistent with our argument on this requirement, we also question how the drafting team was able to justify a "Medium" VRF. It very clearly doesn't meet the guidelines." [End DEC comment quote]. ITC further concurs with the MRO NSRF submitted comments that "SOL's must either be removed from consideration, or more narrowly defined to the appropriate set of SOL's that directly impact the reliability of the BES (cause instability, uncontrolled separation, or cascading outages)."

No

Regarding R3: Consistent with our comments on TOP-001 R6, we believe that the use of the word "registered" entities does not provide value, and only adds an unnecessary administrative step to operating personnel. We recommend just using "entities".

No

ITC is concerned with the removal from R1.1 of the phrase "...at the discretion of the Transmission Operator or Balancing Authority". Why was this removed? The TO and BA should have discretion of what data it needs (especially at the sub-BES level) to perform Operational Planning Analysis and Real time monitoring. Also in R1.1, please define what "long-term outages" are.

Group
ISO/RTO Standards Review Committee
Albert DiCaprio
No
The requirement(s) (R9, 10 and 11) that stipulate returning SOLs which “have been identified as supporting internal area reliability” within 30 minutes should be deleted, the internal procedures would identify the necessary rating and timing associated with each of the ratings. The SRC proposes the following changes: R8. Each Transmission Operator shall inform its Reliability Coordinator of all SOLs and the durations for which they can be exceeded in cases where those SOLs, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations] Delete the following requirement entirely--- R9. Each Transmission Operator shall not operate outside any System Operating Limit (SOL) identified in Requirement R8 for a continuous duration exceeding 30 minutes. [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations] new R9. Each Transmission Operator shall inform its Reliability Coordinator of its actions to return the system to within limits when an IROL, or each SOL identified in Requirement R8, has been exceeded. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations] new R10. Each Transmission Operator shall act or direct others to act, to mitigate both the magnitude and duration of exceeding an IROL within the IROL’s Tv, or of an SOL identified in Requirement R8 within [DELETE 30 minutes] the time specified by the Transmission Operator. [Violation Risk Factor: High] [Time Horizon: Real-time Operations] There doesn’t seem to be a need for R9 since this is covered in R11.
Yes
No
The second bullet under R1, 1.1 facilities “at voltage levels lower than the BES;” we believe that these facilities are not enforceable under the NERC Standards. We believe any such references should be removed. We suggest removing this phrase from the bullet.
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
No comments
No comments
No
The need for the proposed “overarching” document is not necessary and appears cumbersome for many regions of the country such as the western interconnect.
No
We concur with the WECC recommendations as stated in the WECC Position Paper for the initial ballot of Project 2007-03 – Real-time Operations as follows: TOP-001-2 R6: Clarification of the language and intent of Requirement R6 and the VSLs for R6 is needed. For example, it is difficult to determine if the Lower VSL for R6 is based on the responsible entity not notifying every negatively impacted entity of outages of equipment between the TOP and one (or 5%) affected entity, or if it is based on not telling one (or 5%) negatively impacted entity of outages. The same confusion exists in the remainder of the VSLs for R6. TOP-003-2 R1: The VSLs do not appear to address the situation where the responsible entity did not include three or more of the required elements of the documented specification for the data necessary for it to perform its required Operations Planning Analyses and Real-time monitoring, but still had a documented specification. TOP-003-2 R4: The binary Severe VSL for R4 seems harsh. A responsible entity receiving a specification in Requirement R2 or R3 could have conceivably satisfied 99% of the obligations of the documented specifications for data and yet with this binary VSL, they would still be facing a Severe violation. Why are there not percentage graduations as in the other VSLs?

No comments
Individual
Kathleen Goodman
ISO New England Inc.
No
The requirement(s) (R9, 10 and 11) that stipulate returning SOLs which “have been identified as supporting internal area reliability” within 30 minutes should be deleted, the internal procedures would identify the necessary rating and timing associated with each of the ratings. We propose the following changes: R8. Each Transmission Operator shall inform its Reliability Coordinator of all SOLs and the durations for which they can be exceeded in cases where those SOLs, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis. Delete the following requirement entirely--- R9. Each Transmission Operator shall not operate outside any System Operating Limit (SOL) identified in Requirement R8 for a continuous duration exceeding 30 minutes.---There doesn’t seem to be a need for this is covered in R11. Formerly R10, new R9. Each Transmission Operator shall inform its Reliability Coordinator of its actions to return the system to within limits when an IROL, or each SOL identified in Requirement R8, has been exceeded. Formerly R11, new R10. Each Transmission Operator shall act or direct others to act, to mitigate both the magnitude and duration of exceeding an IROL within the IROL’s Tv, or of an SOL identified in Requirement R8 within [DELETE 30 minutes] the time specified by the Transmission Operator.
Yes
No
The second bullet under R1, 1.1 facilities “at voltage levels lower than the BES;” we believe that these facilities are not enforceable under the NERC Standards. We believe any such references should be removed. We suggest removing this phrase from the bullet.
Group
Florida Municipal Power Agency
Frank Gaffney
No
R5 requires communications / coordination more than the version 1 standard (old R7) to those actions that can result in an Adverse Reliability Impact, which are very few and is ambiguous. FMPA suggests adding the phrase “or cause an SOL or IROL to be exceeded” to the requirements, such as “Each Transmission Operator shall inform neighboring other Transmission Operators of its operations known or expected to result in an Adverse Reliability Impact or cause an SOL or IROL to be exceeded on those respective Transmission Operator Areas ....” Also, there seems to be overlap of responsibility with the RC in real-time operations concerning SOLs and IROLs. FMPA can certainly see informing the RC and neighboring TOPs of a potential SOL / IROL in an Operational Planning Assessment, but, in real-time, that may be too much of a burden and might step on the RC’s toes in efficient and effective communication and coordination. R7 is ambiguous as to whether the IROL and IROL Tv are IROLs identified in real-time or identified through Operational Planning Analysis. R7 should be treated in a similar manner to R9 and refer to those IROLs identified through the Operational Planning Analysis. The concern is that if an extreme contingency occurs beyond what is in the scope of the Operational Planning Analysis, and that extreme contingency causes an IROL with a very short Tv in real-time, will the TOP be able to comply? R8 belongs in TOP-002-3 since it is Operational Planning Analysis. R11 seems to create double jeopardy with R7 and R9. R11 should be deleted and the concepts embedded in R11, such as “direct others” and “limit the magnitude and duration”, ought to be included in R7 and R9 instead.
No
The prior version 2 standard was applicable to both the BA and the TOP. The new standard is just the TOP, which is appropriate; however, it was the old TOP-002-1 that basically required the BA to validate the unit commitment of resources to ensure enough capacity is committed to meet the next

day's peak load plus ancillaries (at least that's how we interpreted R5, R6, R7 and R9 of the version 2 standard and how they would apply to a BA). BAL-002-0 requires that a BA have enough contingency reserves, but, it is unclear as to whether a BA is permitted to shed load to achieve those reserves, and how regulation service and frequency reserves are handled. FMPA suggests that TOP-002-3 include a temporary requirement for BA's to plan to meet the current day / next day projected peak loads plus reserve requirements until it is included in the BAL standards and at which time the requirement in the TOP standards could be retired. Operational Planning Analysis is ambiguous. R1 doesn't talk about the time frame of operations planning. The old version clearly had current day, next day and seasonal operations planning requirements that probably ought to be retained, as opposed to the ambiguous phrasing of R1. It also does not talk about what is being studied, e.g., the same contingencies included in the RC SOL methodology of FAC-011 for instance. FMPA suggests defining the capitalized term of Operational Planning Analysis and add it to the NERC Glossary, especially since it is a capitalized term in the standard. R2 is confusing. We are sure the intent is that, if the Operational Planning Analysis results show that an SOL or IROL would be exceeded as a result of single / double contingencies covered by the RC's SOL Methodology of FAC-011, then the TOP must develop a plan to resolve the situation within the Tv of the SOL or IROL. FMPA recommends that the SDT redraft R2 to make it less confusing and add clarity, maybe something like: "Each TOP shall develop plans to relieve an SOL or IROL violation identified in the results of Operational Planning Analyses within the time constraints related to the SOL or IROL (e.g., within the time frame of emergency ratings or the IROL Tv)" Such a change will also help clarify which entities are notified in R3. Currently, R3 is ambiguous as well since R2 as currently drafted seems to indicate that the Operational Planning Analysis itself if the plan, and since everyone has a role in that plan, then R3 seems to indicate that everyone needs to be notified, which we doubt is the intent of the SDT.

No

R1 - in general, "data necessary for it to perform its required Operational Planning Analysis and Real-time monitoring" is more ambiguous than the many requirements it replaced. It may be beneficial to include a statement something like "including but not limited to:" and then include a bullet list of all the requirements it replaced in the prior version of the TOP standards. It would also be beneficial to split this requirement into two requirements, one for real-time and one for Operational Planning Analysis since they are separate databases. R1.1, second bullet - although there is certainly a need to describe "operating parameters for BES Facilities and Facilities at voltage lower than the BES" there are two problems with the statement: (i) Facilities by definition are part of the BES, e.g., NERC Glossary defines Facility as: "A set of electrical equipment that operates as a single Bulk Electric System Element ...."; hence, the second use of Facilities in the phrase ought to be deleted, or at minimum, replaced with the term Elements; and (ii) although there is certainly a need to describe operating parameters for non-BES equipment, there is no need to regulate that activity through the standards as it has no bearing on BES reliability. R1.2 "mutually" agreeable - who is mutually agreeing? R1 seems to imply the BA and TOP, but, the intent seems to be more in line with the entities described in R4, the BA, GO, GOP, IA, LSE, TOP, and TO. FMPA suggests clarifying who is mutually agreeing. Also, from a reliability perspective, the TOP and BA needs to have final say if the entities cannot agree as a "backstop" provision. Suggest adding a stakeholder process something like what is in PRC-006-2 R14. R1.3 and R1.4 - should have the same characterization of R1.2, e.g., "mutually" or stakeholder process driven to establish a schedule.

No

FMPA has no comments on the VRFs FMPA believes significant changes to the standards are required; hence, it is too early to opine on the VSLs.

Group

PPL Supply

Annette Bannon

No

While PPL Generation and EnergyPlus generally agrees with the changes that were made, we do not feel the standard is ready for balloting based on the following comments: R1 and R2 – In both requirements, notification of the TOP is required and appears to be for the same condition. If this is not so, the requirements need to be more specific regarding the reasons for notification. For example, R1 appears to require notification for specific conditions regarding violations of safety, equipment,

regulatory or statutory requirements and R2 could be interpreted that after agreeing to and during the course of complying with a reliability directive, the entity was unable to do so. PPL Generation and EnergyPlus does not believe that these two requirements need to be separated. Moreover, to the extent there are duplicative requirements for the same issue, if a violation were to occur, an entity may be in violation of two requirements instead of one. The standards must clearly state what is required and must do so without creating duplicative or overlapping requirements or sub-requirements. As presently drafted, R1 and R2 create confusion as to what is required and could result in multiple self reports for the same potential violation and potentially additional penalties as a result of two violations for what appears to be the same issue. R3 – This requirement appears to be an operational planning requirement and may more appropriately be inserted in TOP-002-3. If it remains in this standard, we suggest the following wording: Each TOP shall inform its RC and all other TOPs that are expected to be affected by anticipated emergencies based on its operational planning analysis. PPL Generation and EnergyPlus thinks “assessment” is synonymous with “analysis”). We also believe that R5 is intended to cover real-time operations. The time horizons do not appear to match the requirement, i.e., Operations Planning. R4 – No comments R5 – PPL Generation and EnergyPlus recommend similar language to that in R3 for consistency and clarity, i.e., R3 has “all other transmission operators” and R5 has “other Transmission Operators”. The requirement is unclear in describing who is responsible for informing whom, needs to be rewritten to clarify. R6 – What is meant by “associated communication channels”? Data or Voice or both? Is this not covered by the COM Standards? Additionally, please clarify what is intended by terms “negatively impacted interconnected NERC entities” and “control equipment” as used in proposed R6. R7 – No comments R8 – The use of Operational Planning Analysis in this requirement is not consistent with the Time Horizon of Real-time Operations. Based on the NERC definition Operational Planning Analysis is considered future looking (next-day through 12 months) this would exclude modification to SOLs made during Real-time Operations. SOLs utilized in Operational Planning Analysis are based on certain assumptions given forecasted conditions or historical data. Real-time operating conditions can vary drastically from these assumptions and there needs to be flexibility in modifying SOLs to account for these actual system conditions. R9 – The 30 minute duration is quite restrictive in resolving an SOL exceedance, especially for those that are considered to support internal area reliability. Does this apply only to actual SOL exceedances, or does it also include post-contingent SOL exceedances? PPL Generation and EnergyPlus feel the time limit should be at least 90 minutes for exceeding an SOL (especially for post-contingent SOLs), to allow for use of TLR procedures or other measures which often take more than 30 minutes to implement. There needs to be some flexibility in establishing Real-time Operations SOLs based on actual system conditions separate from the Operational Planning Analysis. R10 – Because the Time Horizon is “Real-time Operations” the SOLs communicated to the RC per this requirement should be the Real-time Operations established SOLs, not the Operational Planning Analysis SOLs established in R8. R11 – The SOLs established in R8 deal with future looking Operational Planning Analysis, however this requirement deals with Real-time Operations. Need clarification about Real-time Operations SOLs and we suggest the time duration for SOLs exceedances should be at least 90 minutes as described in R9.

No

R1 – No comments R2 – The word “preclude” can be interpreted as “prevent”, which would mean that any exceedance of an IROL or SOL would be a violation, regardless of duration. Other wording, such as “avoid” should be considered. R3 – No comments

Yes

R1.1 - It is our understanding that bullets should be avoided in the requirements. R2 – No comments R3 – No comments R4 – No comments

No

The Time Horizons seem to be inconsistent with established NERC definitions. The VSLs need to be updated with language modified in the requirements.

N/A

Group

Luminant Energy

Jeff Longshore

Yes

Yes
No
While we agree with the concept of the TOP and BA creating a specification for data necessary for Operational Planning and Real-time monitoring, we feel that Requirement 1.2 should explicitly state that the format should be mutually agreeable to the TOP and BA and the parties receiving the data request under R2 and R3. Additionally, for R1.3, we feel the same mutually agreeable requirement between the TOP and BA and the parties receiving the data request should be added for the periodicity requirement.
Yes
Individual
Brenda Pulis
Oncor Electric Delivery
No
For TOP-001, Oncor does not believe that the proposed language will provide a coordinated communication effort in the event of a planned outage of telemetry, control equipment and associated communication channels. In addition, the term "negatively impacted interconnected registered entities" is 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.
Yes
Yes
Yes
Individual
Michael Falvo
Independent Electricity System Operator
No
In Requirement R2, there is a need to specify how much time should be allowed to "inform its Transmission Operator upon recognition of its inability to perform an identified Reliability Directive issued by that Transmission Operator." Suggest rewording R2 to read: Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall immediately inform its Transmission Operator of its inability to perform a Reliability Directive. In Requirement R4, we suggest the following rearrangement of the sentence to improve readability: R4: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory, or statutory requirements, and provided that the requesting entity has implemented its comparable emergency procedures. In Requirement R8, we suggest replacing "internal area" with "BES" for greater clarity. The requirement(s) (R9, 10 and 11) that stipulate returning SOLs which "have been identified as supporting internal area reliability" within 30 minutes should be modified to allow the TOP and RC to determine the appropriate timeframe for correcting such exceedances. We suggest the following alternative wording for Requirements R8 to R11. Additionally, we suggest removing R9 since its provisions are already covered in R11. R8. Each Transmission Operator shall inform its Reliability Coordinator of all SOLs and the durations for which they can be exceeded in cases where those SOLs, while not IROLs, have been identified by the Transmission Operator as supporting its BES reliability based on its assessment of its Operational Planning Analysis. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations] R9. Each Transmission Operator shall inform its Reliability Coordinator of its actions to return the system to within limits when an IROL, or each SOL identified in

Requirement R8, has been exceeded. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations] R10. Each Transmission Operator shall act or direct others to act, to mitigate both the magnitude and duration of exceeding an IROL within the IROL's Tv, or of an SOL identified in Requirement R8 within the time specified by the Transmission Operator. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]

Yes

No

Referring to the second bullet under R1, Part 1.1, "...Facilities at voltage levels lower than the BES;" these facilities are not enforceable under the NERC Standards. Any such references should be removed. Editorial comment: remove M5 because there is no corresponding R5.

No

Referring to the Moderate and High VLSs for TOP-001-2 Requirements R3, R5, R6 and R8, where these VLSs state "...more than x% or less than or equal to y%...", suggest changing to "...more than x% and less than or equal to y%...". These changes would also make these VLSs consistent with the language of TOP-002-3 and TOP-003-2.