

Compliance Operations

Draft Reliability Standard Compliance Guidance for MOD-032-1 and MOD-033-1

October 22, 2013

Introduction

The NERC Compliance department (Compliance) worked with the 2010-03 Modeling Data standard drafting team (SDT) to review the proposed standards MOD-032-1 and MOD-033-1. The purpose of the review was to discuss the requirements of the pro forma standards to obtain an understanding of their intended purposes and necessary evidence to support compliance. The purpose of this document is to address specific questions posed by the SDT in order to aid the drafting of the requirements and provide a level of understanding regarding evidentiary support necessary to demonstrate compliance.

While all compliance evaluations require levels of auditor judgment, participating in these reviews allows Compliance to develop training and approaches to support a high level of consistency in audits conducted by the Regional Entities. The following questions should both assist the SDT in further refining the standard and serve as a tool to develop auditor training.

MOD-032-1 and MOD-033-1 Questions

Question 1

Under MOD-032-1 Requirement R1, how will the requirement for “(e)ach Planning Coordinator and each of its Transmissions Planners *shall jointly develop* . . . data requirements and reporting procedures . . .” be assessed for compliance? (Emphasis added).

Compliance Response to Question 1

During a compliance assessment, an auditor will look for evidence that the entities jointly developed the requirements and reporting procedures as required. In the absence of evidence demonstrating joint development, an auditor will not entertain arguments that one entity was cooperative and the other was not. Both entities will be assessed based on whether there was joint development. The auditor will note the results to be included in the next compliance assessment of the entity that was not currently being audited.

Evidence of joint development may include emails, drafts of data requirement documents or reporting procedures, meeting notes, phone records, or other evidence or attestations demonstrating agreement for the data requirements and reporting procedures.

Question 2

Under MOD-032-1 Requirement R2, will the auditor verify only that the data was delivered as specified, or will the auditor make a determination regarding whether the quality of the data is sufficient?

Compliance Response to Question 2

Based on the language in the requirement and the purpose of the standard, which is to facilitate the transfer of data for modeling purposes, the auditor will verify that the data was delivered as specified. This standard does not specify the criteria around quality, so auditors will not make any assessments in that regard.

Question 3

In MOD-033-1 Requirement R1, Part 1.3, is it clear what is meant by “unacceptable differences in performance”?

Compliance Response to Question 3

Based on the language in the requirement and the purpose of the standard, which is to implement a process to validate data, the auditor will verify that the documented process includes guidelines for how the Planning Coordinator will determine when and under what circumstances the performance comparisons conducted under Parts 1.1 and 1.2 result in “unacceptable differences.”

Conclusion

Following final approval of the Reliability Standard, Compliance will develop the final Reliability Standards Auditor Worksheet (RSAW) and associated training. Attachment A represents the versions of the proposed standards requirements referenced in this document.

Attachment A

MOD-032-1 Requirements and Measures

- R1.** Each Planning Coordinator and each of its Transmission Planners shall jointly develop steady-state, dynamics, and short circuit modeling data requirements and reporting procedures for the Planning Coordinator's planning area that include: *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*
- 1.1.** The data listed in Attachment 1; and
 - 1.2.** Specifications of the following items consistent with procedures for building the Interconnection-wide case(s):
 - 1.2.1.** Data format;
 - 1.2.2.** Level of detail to which equipment shall be modeled;
 - 1.2.3.** Case types or scenarios to be modeled; and
 - 1.2.4.** A schedule for submission of data at least once every 13 calendar months.
 - 1.3.** Specifications for distribution or posting of the data requirements and reporting procedures so that they are available to those responsible for providing data to the Planning Coordinator.
- M1.** Each Planning Coordinator and Transmission Planner shall provide evidence that it has jointly developed the required modeling data requirements and reporting procedures specified in Requirement R1.
- R2.** Each Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, and Transmission Service Provider shall provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) according to the data requirements and reporting procedures developed by its Planning Coordinator and Transmission Planner in Requirement R1. For data that has not changed since the last submission, a written confirmation that the data has not changed is sufficient. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M2.** Each registered entity identified in Requirement R2 shall provide evidence, such as email records or postal receipts showing recipient and date, that it has submitted the required modeling data to its Transmission Planner(s) and Planning Coordinator(s); or written confirmation that the data has not changed.

- R3.** Upon receipt of written notification from its Planning Coordinator or Transmission Planner regarding technical concerns with the data submitted under Requirement R3, including the technical basis or reason for the technical concerns, each notified Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider shall respond to the notifying Planning Coordinator or Transmission Planner as follows: *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*
- 3.1.** Provide either updated data or an explanation with a technical basis for maintaining the current data;
 - 3.2.** Provide the response within 90 calendar days of receipt, unless a longer time period is agreed upon by the notifying Planning Coordinator or Transmission Planner.
- M3.** Each registered entity identified in Requirement R3 that has received written notification from its Planning Coordinator or Transmission Planner regarding technical concerns with the data submitted under Requirement R2 shall provide evidence, such as email records or postal receipts showing recipient and date, that it has provided either updated data or an explanation with a technical basis for maintaining the current data to its Planning Coordinator or Transmission Planner within 90 calendar days of the request; or a statement by the Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider that it has not received written notification regarding technical concerns with the data submitted.
- R4.** Each Planning Coordinator shall make available models for its planning area reflecting data provided to it under Requirement R2 to the Electric Reliability Organization (ERO) or its designee to support creation of the Interconnection-wide case(s) that includes the Planning Coordinator's planning area. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M4.** Each Planning Coordinator shall provide evidence, such as email records or postal receipts showing recipient and date, that it has submitted models for its planning area reflecting data provided to it under Requirement R3 when requested by the ERO or its designee.

MOD-033-1 Requirements and Measures

- R1.** Each Planning Coordinator shall implement a documented data validation process that includes the following attributes: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning power flow model to actual system behavior, represented by a state estimator case or other Real-time data sources, at least once every 24 calendar months through simulation;

- 1.2. Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning dynamic model to actual system response, through simulation of a dynamic local event, at least once every 24 calendar months. If no dynamic local event occurs within the 24 calendar months, use the next dynamic local event that occurs;
 - 1.3. Guidelines the Planning Coordinator will use to determine unacceptable differences in performance under Part 1.1 or 1.2; and
 - 1.4. Guidelines to resolve differences in performance identified under Part 1.3.
- M1. Each Planning Coordinator shall provide evidence that it has a documented validation process according to Requirement R1 as well as evidence that demonstrates the implementation of the required components of the process.

- R2. Each Reliability Coordinator and Transmission Operator shall provide actual system behavior data (or a written response that it does not have the requested data) to any Planning Coordinator performing validation under Requirement R1 within 30 calendar days of a written request, such as, but not limited to, state estimator case or other Real-time data (including disturbance data recordings) necessary for actual system response validation. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

- M2. Each Reliability Coordinator and Transmission Operator shall provide evidence, such as email notices or postal receipts showing recipient and date that it has distributed the requested data or written response that it does not have the data, to any Planning Coordinator who has indicated a need for the data for validation purposes within 30 days of a written request in accordance with Requirement R2; or a statement by the Reliability Coordinator or Transmission Operator that it has not received notification regarding data necessary for validation by any Planning Coordinator.