

Comment Report

Project Name: 2016-01 Modifications to TOP and IRO Standards SAR
Comment Period Start Date: 1/22/2016
Comment Period End Date: 2/22/2016
Associated Ballots:

There were 22 sets of responses, including comments from approximately 22 different people from approximately 21 companies representing 8 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the proposed scope for Project 2016-01 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

2. Provide any additional comments for the SDT to consider, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Ben Engelby	6		ACES Standards Collaborators - TOP/IRO Project	Chip Koloini	ACES Power Marketing	3,5	SPP RE
					Bob Solomon	ACES Power Marketing	1	RF
					Shari Heino	ACES Power Marketing	1,5	Texas RE
					Mike Brytowski	ACES Power Marketing	1,3,5,6	MRO
					Ginger Mercier	ACES Power Marketing	1,3	SERC
					Ellen Watkins	ACES Power Marketing	1	SPP RE
MRO	Emily Rousseau	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	MRO	3,4,5,6	MRO
					Chuck Lawrence	MRO	1	MRO
					Chuck Wicklund	MRO	1,3,5	MRO
					Dave Rudolph	MRO	1,3,5,6	MRO
					Kayleigh Wilkerson	MRO	1,3,5,6	MRO
					Jodi Jenson	MRO	1,6	MRO
					Larry Heckert	MRO	4	MRO
					Mahmood Safi	MRO	1,3,5,6	MRO
					Shannon Weaver	MRO	2	MRO
					Mike Brytowski	MRO	1,3,5,6	MRO
					Brad Perrett	MRO	1,5	MRO
					Scott Nickels	MRO	4	MRO
					Terry Harbour	MRO	1,3,5,6	MRO
					Tom Breene	MRO	3,4,5,6	MRO
					Tony Eddleman	MRO	1,3,5	MRO
Amy Casucelli	MRO	1,3,5,6	MRO					
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC	Seattle City Light Ballot Body	Pawel Krupa	Seattle City Light	1	WECC
					Dana Wheelock	Seattle City Light	3	WECC
					Hao Li	Seattle City Light	4	WECC

Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC	Seattle City Light Ballot Body	Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,3,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
New York Independent System Operator	Gregory Campoli	2		ISO/RTO Standards Review Committee	Gregory Campoli	New York Independent System Operator	2	NPCC
					Ben Li	New York Independent System Operator	2	NPCC
					Kathleen Goodman	New York Independent System Operator	2	NPCC
					Mark Holman	New York Independent System Operator	2	NPCC
					Charles Yeung	New York Independent System Operator	2	SPP RE
					Terry Bilke	New York Independent System Operator	2	MRO
					Nathan Bigbee	New York Independent System Operator	2	Texas RE
					Ali Miremadi	New York Independent System Operator	2	WECC
Dominion - Dominion Resources, Inc.	Randi Heise	3,5,6		Dominion - RCS	Larry Nash	Dominion - Dominion Resources, Inc.	1	SERC

Dominion - Dominion Resources, Inc.	Randi Heise	3,5,6		Dominion - RCS	Louis Slade	Dominion - Dominion Resources, Inc.	6	SERC
					Connie Lowe	Dominion - Dominion Resources, Inc.	3	RF
					Randi Heise	Dominion - Dominion Resources, Inc.	5	NPCC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7	NPCC	RSC no ISO- NE HQ and NextEra	Paul Malozewski	Northeast Power Coordinating Council	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Brian Shanahan	Northeast Power Coordinating Council	1	NPCC
					Rob Vance	Northeast Power Coordinating Council	1	NPCC
					Mark J. Kenny	Northeast Power Coordinating Council	1	NPCC
					Gregory A. Campoli	Northeast Power Coordinating Council	2	NPCC
					Randy MacDonald	Northeast Power Coordinating Council	2	NPCC
					Wayne Sipperly	Northeast Power Coordinating Council	4	NPCC
					David Ramkalawan	Northeast Power Coordinating Council	4	NPCC

Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7	NPCC	RSC no ISO-NE HQ and NextEra	Glen Smith	Northeast Power Coordinating Council	4	NPCC
					Brian O'Boyle	Northeast Power Coordinating Council	5	NPCC
					Brian Robinson	Northeast Power Coordinating Council	5	NPCC
					Bruce Metruck	Northeast Power Coordinating Council	6	NPCC
					Alan Adamson	Northeast Power Coordinating Council	7	NPCC
					Michael Jones	Northeast Power Coordinating Council	3	NPCC
					Michael Forte	Northeast Power Coordinating Council	1	NPCC
					Kelly Silver	Northeast Power Coordinating Council	3	NPCC
					Brian O'Boyle	Northeast Power Coordinating Council	5	NPCC
					Robert J Pellegrini	Northeast Power Coordinating Council	1	NPCC
					Edward Bedder	Northeast Power Coordinating Council	1	NPCC
					David Burke	Northeast Power Coordinating Council	3	NPCC

Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7	NPCC	RSC no ISO-NE HQ and NextEra	Peter Yost	Northeast Power Coordinating Council	4	NPCC
					Helen Lainis	Northeast Power Coordinating Council	2	NPCC
					Connie Lowe	Northeast Power Coordinating Council	4	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool, Inc. (RTO)	2	SPP RE
					Jason Smith	Southwest Power Pool, Inc. (RTO)	2	SPP RE
					Jim Nail	Southwest Power Pool, Inc. (RTO)	3,5	SPP RE
					J. Scott Williams	Southwest Power Pool, Inc. (RTO)	1,4	SPP RE
					Kevin Giles	Southwest Power Pool, Inc. (RTO)	1,3,5,6	SPP RE
					Ellen Watkins	Southwest Power Pool, Inc. (RTO)	1	SPP RE
					Sing Tay	Southwest Power Pool, Inc. (RTO)	1,3,5,6	SPP RE
					John Allen	Southwest Power Pool, Inc. (RTO)	1,4	SPP RE
					Mike Kidwell	Southwest Power Pool, Inc. (RTO)	1,3,5	SPP RE
					Don Schmit	Southwest Power Pool, Inc. (RTO)	1,3,5	MRO

1. Do you agree with the proposed scope for Project 2016-01 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Thomas Foltz - AEP - 3,5

Answer No

Document Name

Comment

AEP recognizes FERC's concerns regarding identification of non-BES facilities, however, there would be far more flux involved in their identification and real-time monitoring (as suggested by the SAR) than may be widely understood or appreciated. This subset of non-BES facilities would change quite frequently, and creating obligations to govern such frequently changing identification and real-time monitoring would likely require much effort, with little to no improvement in reliability. Rather than developing additional requirements which would not likely be beneficial, we believe a more prudent approach would be to focus on the desired end state itself. We believe the argument can be made that our existing obligations, when considered as a whole, could collectively appease FERC's concerns.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

We have no concern with the Commission's directive that there should be some additional language in reference to TOP-001-3 Requirement R10. Also, we agree that IRO-002-4 Requirement R3 can serve as a foundation for that particular language. We also suggest that the drafting team follow the Functional Model Advisory Group's efforts very closely so that any clarified functional obligations are captured and consistent with the Functional Model. Additionally, we would suggest the drafting team to clarify that the non-BES facilities that the TOP is required to monitor be only those facilities that were identified by the Reliability Coordinator in IRO-002-4.

As for the Commission's suggestion of adding clarity to the term 'redundant infrastructure', our review group suggests the SDT consider developing a Standards Authorization Request (SAR) to create a definition for this particular term that can be added to the NERC Glossary, Rules of Procedure, and Functional Model. When the term "Alternative Interpersonal Communication" was created as a part of COM-001-2, the SDT included within the definition that the capability must use a different infrastructure. The definition of 'redundant infrastructure' could include the requirement to be diversely routed.

We don't feel it is appropriate to have a blanket requirement for the TOP to be required to have fully redundant data exchange capabilities with each entity it has identified it needs data from. The Transmission Operator may only receive a handful of points from certain entities, and there may be minimal impact to reliability if that data was lost. Any new requirement or change to R19 and R20 should provide the Transmission Operator the ability to identify and declare the entities with which it needs to have fully redundant and diversely routed data exchange capability.

In addition to the directives by FERC to modify the TOP and IRO standards, we suggest that the SDT review the use of the term 'Operating Instruction' as found in the TOP and IRO standards. It appears that the COM-002-4 Drafting Team did not intend to do a direct replacement of the term 'Directive' with 'Operating Instruction'. However, it appears the TOP-001-3 R3 and R4 are zero tolerance on compliance with EACH Operating Instruction. Previously the wording in the Standards required zero tolerance on the receipt of Directives. The definition of Operating Instruction is much broader and can be interpreted to include some system to system communications that were not previously considered to be Directives. We do not believe the intent of the term Operating Instruction in TOP-001-3 is consistent with the definition and use of the term in COM-002-4.

Likes	0
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Dislikes	0
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Response

Joshua Smith - Oncor Electric Delivery - 1 - Texas RE

Answer	No
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Document Name	
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Comment

The suggested revision of approved NERC Standard TOP-001-3, specifically Requirement 10, to require real-time monitoring of non-BES facilities is not needed and is already covered by the existing language. Requirement 10.1 states; "Within its Transmission Area, monitor facilities and the status of Special Protection Systems, and". R10.1 requires TOPs to monitor facilities to determine SOL exceedances, which allows the TOP to decide which "Facilities" it deems necessary to meet the task required by R10. By adding the requirement to real-time monitor non-BES facilities, the Standard requires how something should be done instead of stating what is required and allowing the utility to decide how.

Likes	0
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Dislikes	0
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Response

Jennifer Losacco - NextEra Energy - Florida Power and Light Co. - 1 - FRCC

Answer	No
Document Name	
Comment	
<p>Florida Power and Light (FPL) appreciates the efforts of NERC drafting a SAR proposing changes to TOP-001-3 and IRO-002-4 to address concerns expressed during the FRCC Order No. 817. For the three specific concerns mentioned, Monitoring non-Bulk Electric Systems facilities, FPL believes the new TOP-001-3 standard and the BES definition addresses this concern and do not feel a standard revision is necessary. In the case of Redundancy and Diverse Routing of Data Exchange Capabilities, FPL believes the revised TOP and IRO standards adequately address redundancy and diverse routing of data exchange capabilities and do not feel additional standard revisions are necessary. Lastly, in the testing of the Alternative or Less Frequently Used Data Exchange Capability, FPL believes RCs, TOPs and BAs should have protocols to ensure their alternative data exchange capabilities are viable in order to comply with the revised TOP and IRO standards and in good utility practice; and do not feel additional standard requirements are necessary.</p>	
Likes	0
Dislikes	0
Response	
Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body	
Answer	Yes
Document Name	Project 2016-01 IRO_TOP SAR comments City Light 2016 Feb 18.dotx
Comment	
See attached document	
Likes	0
Dislikes	0
Response	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
<p>ERCOT joins in the comments of the IRC Standards Review Committee (SRC).</p> <p>The SRC agrees that a drafting team needs to address the directives issued by FERC in Order No 817.</p>	
Likes	0
Dislikes	0
Response	

William Temple - PJM Interconnection, L.L.C. - 2 - RF

Answer Yes

Document Name

Comment

PJM supports the comments submitted by the ISO/RTO Standards Review Committee (SRC).

Likes 0

Dislikes 0

Response

Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee

Answer Yes

Document Name

Comment

: The SRC agrees that a drafting team needs to address the directives issued by FERC in Order No 817.

Likes 0

Dislikes 0

Response

Ben Engelby - ACES Power Marketing - 6, Group Name ACES Standards Collaborators - TOP/IRO Project

Answer Yes

Document Name

Comment

We agree that the scope of the SAR is drafted to address the FERC directives in Order No. 817. We ask the SDT to strongly consider cost implications and to explore equally efficient and effective alternatives to developing additional requirements. Such alternatives could include glossary term revisions, identifying existing standards that already address the directive, or the development of a reliability guideline.

Likes 0

Dislikes 0

Response

Mike Smith - Manitoba Hydro - 1,3,5,6

Answer	Yes
Document Name	
Comment	
The SDT directive to “revise TOP-001-3 R10 to require real-time monitoring of non-BES facilities” needs to be developed using clear criteria delineating when monitoring is required and what approach or parameters would constitute adequate monitoring.	
Likes 0	
Dislikes 0	
Response	
Jared Shakespeare - Peak Reliability - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Kenny - Eversource Energy - 1,3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Randi Heise - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion - RCS

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO-NERC Standards Review Forum (NSRF)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamison Dye - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7 - NPCC, Group Name RSC no ISO-NE HQ and NextEra	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Provide any additional comments for the SDT to consider, if desired.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7 - NPCC, Group Name RSC no ISO-NE HQ and NextEra

Answer

Document Name

Comment

The SAR should allow the SDT to explain the meaning of “diverse routing” and “redundancy”. A glossary term may not be needed but an explanation of the intent will be required to facilitate compliance.

Also, as a general comment, FERC wanted to limit “redundancy and diversity” to data exchange between RC, TOP and BA so the SDT will need to avoid capturing other entities like TO and DP into this requirement.

Likes 0

Dislikes 0

Response

Ben Engelby - ACES Power Marketing - 6, Group Name ACES Standards Collaborators - TOP/IRO Project

Answer

Document Name

Comment

1. We recommend that the SDT conduct a technical conference relating to this project to explore any equally efficient and effective alternatives in lieu of modifying the existing standards. This would allow industry an opportunity to provide initial feedback prior to any proposed standard revisions. We also recommend that if the SDT agrees with this approach, that it considers broadcasting the technical conference via a webinar for industry stakeholders who are unable to attend in person. A recent technical conference held for NERC Project 2007-06.2 was limited to 20 people and was not open to a large majority of industry to attend.
2. For TOP-001-3 R10, we have concerns with the proposal of expanding the TOP’s responsibilities for monitoring non-BES facilities. The SDT could consider alternatives including references to the existing BES exception process or the development of a reliability guideline. In the event that the SDT decides to pursue development of the requirement instead of identifying an alternative, we recommend limiting the scope of monitoring non-BES facilities to only the facilities that were identified by the Reliability Coordinator in IRO-002-4 and agreed to by the Transmission Operator.
3. For TOP-001-3 R19 and R20 relating to “redundant infrastructure,” the SDT should consider developing a formal glossary term to provide clarity for the requirements. Cost considerations should also be factored into the development of these requirements.
4. Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee

Answer

Document Name

Comment

The SRC would like NERC and the drafting team to consider alternatives to a reliability standard to address the directives included in the Order. The types of activities contemplated in the SAR are upstream and act as controls around registered entities performing core reliability functions, such as responding to IROL's or developing emergency plans. Redundant and diversely routed data exchange capabilities, in addition to testing of alternate or less frequently used data exchange capabilities are not core reliability requirements. Moreover, given the relatively static nature of these types of activities (e.g., establishing communications equipment), RC/BA/TOP Certification is a more appropriate program for the ERO to use to support reliable operations than auditing.

Also, the SRC would like the drafting team to consider clarifying "redundant and diversely routed data exchange capabilities". The SRC asks the SDT to consider whether data that goes to two independent control sites satisfy the concepts of redundant and diversely routed or does the SDT intend to require two independent feeds to each cite?

The SRC would also like the SDT to consider the applicability of non-BES Elements to the standards process. NERC is close to implementing an improved BES Definition on July 1, 2016, that will provide greater clarity to facilities that will impact the interconnected transmission system. The SDT should consider how this definition can capture elements that may not meet the core BES definition but should be BES going forward.

Likes	0
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Dislikes	0
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Response

Joshua Smith - Oncor Electric Delivery - 1 - Texas RE

Answer	
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Document Name	
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Comment

TOP-001-3 R10 as proposed requires each TOP shall monitor Facilities and the status of SPSs within its TOP area and obtain and utilize status, voltages and flow data for facilities and status of SPS outside its TOP area. The ERCOT region is structured to support a deregulated market in which ERCOT monitors facilities for all TOPS and has a centralized view of the entire region to maintain reliability. TOPs operating within ERCOT currently do not have the technical capability to monitor facilities of neighboring TOPs. This requirement imposes a "one size fits all" regional structure which would place an unreasonable financial burden on all TOPs to both install and maintain additional hardware in each station or install and maintain multiple ICCPs between control centers. This requirement would place this financial burden on TOPs for nothing more than to replicate an RC function with no benefit to the BES. At no point in proposed Standard TOP-001-3 does it require TOs to supply neighboring TOs with this data. Oncor requests R10 be reworded to provide flexibility for region structure.

Likes	0
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Dislikes	0
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Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer	
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Document Name	
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Comment

ERCOT joins in the comments of the IRC Standards Review Committee (SRC).

The SRC would like NERC and the drafting team to consider alternatives to a reliability standard to address the directives included in the Order. The types of activities contemplated in the SAR are upstream and act as controls around registered entities performing core reliability functions, such as responding to IROL's or developing emergency plans. Redundant and diversely routed data exchange capabilities, in addition to testing of alternate or less frequently used data exchange capabilities are not core reliability requirements. Moreover, given the relatively static nature of these types of activities (e.g., establishing communications equipment), RC/BA/TOP Certification is a more appropriate program for the ERO to use to support reliable operations than auditing.

Also, the SRC would like the drafting team to consider clarifying "redundant and diversely routed data exchange capabilities". The SRC asks the SDT to consider whether data that goes to two independent control sites satisfy the concepts of redundant and diversely routed or does the SDT intend to require two independent feeds for each data sample to each site?

The SRC would also like the SDT to consider the applicability of non-BES Elements to the standards process. NERC is close to implementing an improved BES Definition on July 1, 2016, that will provide greater clarity to facilities that will impact the interconnected transmission system. The SDT should consider how this definition can capture elements that may not meet the core BES definition but should be BES going forward.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer

Document Name

Comment

Though the directives given by FERC potentially impact the same standard(s), and the "identification of non-BES elements" and "redundant data exchange capabilities" emanate from the same FERC Order, the topics appear disparate enough to drive two separate projects. Would it be preferable to create two separate project teams to pursue the FERC directives, rather than combine multiple, dissimilar directives into a single project?

Likes 0

Dislikes 0

Response

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer

Document Name**Comment**

See attached document from 1

Likes 0

Dislikes 0

Response

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO-NERC Standards Review Forum (NSRF)

Answer**Document Name****Comment**

Per section 47 of FERC Order 817, recommend adding Reliability Standards IRO-002-4, Requirement R4 to clarify what “redundant infrastructure” is, within this SAR.

Likes 0

Dislikes 0

Response

Per Order No. 817, revised Reliability Standards addressing these issues must be filed for approval by July 2017.

Questions

1. Do you agree with the proposed scope for Project 2016-01 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Yes

No

Comments:

2. Provide any additional comments for the SDT to consider, if desired.

Comments:

Duke Energy has several thoughts regarding this project we would like to relay to the drafting team.

-Regarding redundancy and diverse routing of data exchange capabilities, Duke Energy requests that the drafting team clearly define what is meant by “data exchange capabilities”. This terminology seems rather vague at this point, and could use an adequate definition to clear up any possible ambiguity. Also, previously a requirement was located in the COM standards that dealt with the necessity of redundant and diverse telecommunications, which was problematic for some in the industry based on a lack of common understanding as to what redundant and diverse actually entailed. This concept of redundant and diverse telecommunications was removed from the COM standards, and to bring the same phrase back in another standard, is likely to only continue the confusion without a common understanding throughout the industry as to what this would mean. Lastly, we assume that the data that this would pertain to is Real-time data, and we question whether an entire path (substation to primary control center) can ever be entirely redundant.

-Duke Energy requests that the drafting team take great care in clarifying/describing what will be expected of the industry regarding the monitoring on non-BES facilities as necessary. Placing this into a NERC standard without clearly putting defined parameters, and writing it so that entities will fully understand the instances in which certain facilities will need to be monitored especially with the great diversity of systems throughout the grid, will be challenging. Clearly defined parameters are necessary, in that it is not feasible to expect entities to monitor all non-BES facilities.

-Regarding the testing of less frequently used data capabilities, Duke Energy is concerned with the vagueness of the phrase “less frequently used”, and requests that the drafting team clearly define what should be considered “less frequently used capabilities”.

Feb 18, 2016

SUBJECT: Project 2016-01 SAR Comments Modifications to TOP and IRO Standards

1. The SDT will be required to *“revise TOP-001-3 R10 (FERC approved on 2015 Nov 19) to require TOPs have real-time monitoring of non-BES facilities.”*

Since City Light is already monitoring the non-BES facilities (or distribution systems) and with the new EMS system, City Light should meet these requirements without this having a big impact on City Light.

2. Per the requirement: *“The SDT will be required to revise the newly approved TOP-001-3 R19 and R20 to require TOPs and BAs to have **the redundant and diversely routed data exchange capabilities.**”* In addition *“a data exchange capability testing framework for the data exchange capabilities to **test the alternate or less frequently used data exchange capabilities** will be required.”*

City Light is concerned that this might require us to install redundant hardware, software, and do performance testing. City Light would like clarity on the expectations.

3. This new NERC Standards Authorization Request project 2016-01 was proposed and submitted by NERC under the FERC directive (Order 817). The SDT will have to file a revised reliability standard addressing these issues for approval within 18 months of Order 817 effective date (Nov 19, 2015).

SCL would like to work with the SDT to ensure they adopt clear and concise language during the standard development process such that implementation will be straight forward, clear and concise.

Sincerely,

Ginette Lacasse
Compliance Strategic Advisor
Seattle City Light

