Unofficial Comment Form

Project 2016-01 Modifications to TOP and IRO Standards

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on

**IRO-002-5 − Reliability Coordination - Monitoring and Analysis** and **TOP-001-4 − Transmission Operations**. The electronic form must be submitted by **8 p.m. Eastern, Wednesday, August 3, 2016.
m. Eastern, Thursday, August 20, 2015**

Additional information about this project is available on the Project 2016-01 Modifications to TOP and IRO Standards [project page](http://www.nerc.com/pa/Stand/Pages/Project-2016-01-Modifications-to-TOP-and-IRO-Standards.aspx). If you have questions, contact Senior Standards Developer, Mark Olson (via email), or at (404) 446-9760.

## Background Information

On November 19, 2015, the Federal Energy Regulatory Commission (FERC) issued [Order No. 817](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20No.%20817%20Approving%20TOP%20IRO%20Reliability%20Standards.pdf) approving revised TOP and IRO standards and directing modifications to address the following reliability concerns:

* Transmission Operator (TOP) monitoring of non-Bulk Electric System (BES) facilities as necessary for reliability (P. 35);
* Redundancy and diverse routing of data exchange capabilities used by Reliability Coordinators (RC), Balancing Authorities (BA), and TOPs (P. 47); and
* Testing of alternate data exchange capabilities used in RC, TOP, and BA control centers (P. 51).

FERC established a deadline of July 2017 for NERC to file modifications to standards addressing the above directives.

Proposed IRO-002-5 and TOP-001-4 contain revised and new requirements addressing the Order No. 817 directives. The Standards Drafting Team (SDT) provided justification for each requirement in the accompanying rationale boxes. Additionally, the SDT replaced the defined term *Special Protection System (SPS)* in the approved standards with the approved defined term *Remedial Action Scheme (RAS).* The SDT did not make any other changes to the requirements in the approved standards.

## Questions

1. The SDT has developed TOP-001-4 Requirement R10 to address directives for TOP monitoring of non-BES facilities necessary for reliability. Do you agree with the proposed requirement? If you do not agree, or if you agree but have comments or suggestions for the proposed requirement provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has developed IRO-002-5 Requirement R2 and TOP-001-4 Requirements R20 and R23 to address directives for redundancy and diverse routing of RC, TOP, and BA data exchange capabilities. Do you agree with the proposed requirements? If you do not agree, or if you agree but have comments or suggestions for the proposed requirements provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has developed IRO-002-5 Requirement R3 and TOP-001-4 Requirements R21 and R24 to address directives for testing redundancy of data exchange capabilities used in RC, TOP, and BA control centers. Do you agree with the proposed requirements? If you do not agree, or if you agree but have comments or suggestions for the proposed requirements provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the Implementation Plan for the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the Implementation Plan provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for the requirements in the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the VRFs and VSLs provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

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

Comments: