

A. Introduction

1. **Title: Transmission Operations**
2. **Number: TOP-001-~~3~~4**
3. **Purpose:** To prevent instability, uncontrolled separation, or Cascading outages that adversely impact the reliability of the Interconnection by ensuring prompt action to prevent or mitigate such occurrences.
4. **Applicability:**
 - 4.1. Balancing Authority
 - 4.2. Transmission Operator
 - 4.3. Generator Operator
 - 4.4. Distribution Provider
5. **Effective Date:**

See Implementation Plan-
- ~~6. **Background:**~~

~~See Project 2014-03 [project page](#).~~

B. Requirements and Measures

- R1.** Each Transmission Operator shall act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions. *[Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]*
- M1.** Each Transmission Operator shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.
- R2.** Each Balancing Authority shall act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions. *[Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]*
- M2.** Each Balancing Authority shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.

- R3.** Each Balancing Authority, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Transmission Operator(s), unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. *[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]*
- M3.** Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by the Transmission Operator(s) unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. In such cases, the Balancing Authority, Generator Operator, and Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Transmission Operator's Operating Instruction. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.
- R4.** Each Balancing Authority, Generator Operator, and Distribution Provider shall inform its Transmission Operator of its inability to comply with an Operating Instruction issued by its Transmission Operator. *[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]*
- M4.** Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Transmission Operator of its inability to comply with its Operating Instruction issued. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.
- R5.** Each Transmission Operator, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Balancing Authority, unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. *[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]*
- M5.** Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by its Balancing Authority unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. In such cases, the Transmission Operator, Generator Operator, and Distribution Provider shall have and

provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Balancing Authority's Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.

- R6.** Each Transmission Operator, Generator Operator, and Distribution Provider shall inform its Balancing Authority of its inability to comply with an Operating Instruction issued by its Balancing Authority. *[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]*
- M6.** Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Balancing Authority of its inability to comply with its Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.
- R7.** Each Transmission Operator shall assist other Transmission Operators within its Reliability Coordinator Area, if requested and able, provided that the requesting Transmission Operator has implemented its comparable Emergency procedures, unless such assistance cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations]*
- M7.** Each Transmission Operator shall make available upon request, evidence that comparable requested assistance, if able, was provided to other Transmission Operators within its Reliability Coordinator Area unless such assistance could not be physically implemented or would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. If no request for assistance was received, the Transmission Operator may provide an attestation.
- R8.** Each Transmission Operator shall inform its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency. *[Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-Time Operations]*
- M8.** Each Transmission Operator shall make available upon request, evidence that it informed its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings,

electronic communications, or other equivalent evidence. If no such situations have occurred, the Transmission Operator may provide an attestation.

R9. Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between the affected entities. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning, Same-Day Operations, Real-Time Operations*]

M9. Each Balancing Authority and Transmission Operator shall make available upon request, evidence that it notified its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence. If such a situation has not occurred, the Balancing Authority or Transmission Operator may provide an attestation.

Rationale for Requirement R10: The revised requirement addresses directives for Transmission Operator (TOP) monitoring of some non-Bulk Electric System (BES) facilities as necessary for determining System Operating Limit (SOL) exceedances (FERC Order No. 817 Para 35-36). The proposed requirement corresponds with approved IRO-002-4 Requirement R4 (proposed IRO-002-5 Requirement R5), which specifies the Reliability Coordinator's (RC) monitoring responsibilities for determining SOL exceedances.

The intent of the requirement is to ensure that all facilities (i.e., BES and non-BES) that can adversely impact reliability are monitored. As used in TOP and IRO Reliability Standards, monitoring involves observing operating status and operating values in Real-time for awareness of system conditions. The facilities that are necessary for determining SOL exceedances should be either designated as part of the BES, or otherwise be incorporated into monitoring when identified by planning and operating studies such as the Operational Planning Analysis (OPA) required by TOP-002-4 Requirement R1 and IRO-008-2 Requirement R1. The SDT recognizes that not all non-BES facilities that a TOP considers necessary for its monitoring needs will need to be included in the BES.

The non-BES facilities that the TOP is required to monitor are only those that are necessary for the TOP to determine SOL exceedances within its Transmission Operator Area. TOPs perform various analyses and studies as part of their functional obligations that could lead to identification of non-BES facilities that should be monitored for determining SOL exceedances. Examples include:

- OPA;
- Real-time Assessments (RTA);

- Analysis performed by the TOP as part of BES Exception processing for including a facility in the BES; and
- Analysis which may be specified in the RC's outage coordination process that leads to the identification of a non-BES facility that should be temporarily monitored for determining SOL exceedances.

TOP-003-3 Requirement R1 specifies that the TOP shall develop a data specification which includes data and information needed by the TOP to support its OPAs, Real-time monitoring, and RTAs. This includes non-BES data and external network data as deemed necessary by the TOP.

The format of the proposed requirement has been changed from the approved standard to more clearly indicate which monitoring activities are required to be performed.

R10. Each Transmission Operator shall perform the following ~~as necessary~~ for determining System Operating Limit (SOL) exceedances within its Transmission Operator Area: *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations]*

~~10.1. Within its Transmission Operator Area, monitor Monitor Facilities within its Transmission Operator Area; and~~

~~10.2. Monitor~~ the status of ~~Special Protection Systems~~ Remedial Action Schemes within its Transmission Operator Area;

~~10.1-10.3.~~ Monitor non-BES facilities within its Transmission Operator Area identified as necessary by the Transmission Operator; and

~~10.4. Outside its Transmission Operator Area, o~~Obtain and utilize status, voltages, and flow data for Facilities outside its Transmission Operator Area identified as necessary by the Transmission Operator;

~~10.5. Obtain and utilize the status of Remedial Action Schemes outside its Transmission Operator Area identified as necessary by the Transmission Operator~~; and

~~10.6. Obtain and utilize status, voltages, and flow data for non-BES facilities outside its Transmission Operator Area identified as necessary by the Transmission Operator.~~

~~10.2. and the status of Special Protection Systems.~~

M10. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, Supervisory Control and Data Acquisition (SCADA) data collection, or other equivalent evidence that will be used to confirm that it monitored or obtained and utilized ~~status, voltages, and flow~~ data ~~for Facilities and the status of~~

~~Special Protection Systems~~ as required to determine any System Operating Limit (SOL) exceedances within its Transmission Operator Area.

- R11.** Each Balancing Authority shall monitor its Balancing Authority Area, including the status of ~~Special Protection System~~Remedial Action Schemes that impact generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency. *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations]*
- M11.** Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it monitors its Balancing Authority Area, including the status of ~~Special Protection System~~Remedial Action Schemes that impact generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.
- R12.** Each Transmission Operator shall not operate outside any identified Interconnection Reliability Operating Limit (IROL) for a continuous duration exceeding its associated IROL T_v . *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- M12.** Each Transmission Operator shall make available evidence to show that for any occasion in which it operated outside any identified Interconnection Reliability Operating Limit (IROL), the continuous duration did not exceed its associated IROL T_v . Such evidence could include but is not limited to dated computer logs or reports in electronic or hard copy format specifying the date, time, duration, and details of the excursion. If such a situation has not occurred, the Transmission Operator may provide an attestation that an event has not occurred.
- R13.** Each Transmission Operator shall ensure that a Real-time Assessment is performed at least once every 30 minutes. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- M13.** Each Transmission Operator shall have, and make available upon request, evidence to show it ensured that a Real-Time Assessment was performed at least once every 30 minutes. This evidence could include but is not limited to dated computer logs showing times the assessment was conducted, dated checklists, or other evidence.
- R14.** Each Transmission Operator shall initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- M14.** Each Transmission Operator shall have evidence that it initiated its Operating Plan for mitigating SOL exceedances identified as part of its Real-time monitoring or Real-time Assessments. This evidence could include but is not limited to dated computer logs showing times the Operating Plan was initiated, dated checklists, or other evidence.

- R15.** Each Transmission Operator shall inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL has been exceeded. *[Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations]*
- M15.** Each Transmission Operator shall make available evidence that it informed its Reliability Coordinator of actions taken to return the System to within limits when a SOL was exceeded. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, or dated computer printouts. If such a situation has not occurred, the Transmission Operator may provide an attestation.
- R16.** Each Transmission Operator shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities. *[Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*
- M16.** Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Transmission Operator has provided its System Operators with the authority to approve planned outages and maintenance of telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.
- R17.** Each Balancing Authority shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities. *[Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*
- M17.** Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Balancing Authority has provided its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.
- R18.** Each Transmission Operator shall operate to the most limiting parameter in instances where there is a difference in SOLs. *[Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*
- M18.** Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to operator logs, voice recordings, electronic communications, or equivalent evidence that will be used to determine if it operated to the most limiting parameter in instances where there is a difference in SOLs.

Rationale for Requirements R19 and R20: The proposed changes address directives for redundancy and diverse routing of data exchange capabilities (FERC Order No. 817 Para 47).

Redundant and diversely routed data exchange capabilities consist of data exchange infrastructure components (e.g. switches, routers, file servers, power supplies, and network cabling and communication paths between these components in the primary Control Center for the exchange of system operating data) that will provide continued functionality despite failure or malfunction of an individual component within the Transmission Operator's (TOP) primary Control Center. Redundant and diversely routed data exchange capabilities preclude single points of failure in primary Control Center data exchange infrastructure from halting the flow of Real-time data. Requirement R20 does not require automatic or instantaneous fail-over of data exchange capabilities. Redundancy and diverse routing may be achieved in various ways depending on the arrangement of the infrastructure or hardware within the TOP's primary Control Center.

The reliability objective of redundancy is to provide for continued data exchange functionality during outages, maintenance, or testing of data exchange infrastructure. The proposed requirements do not specify additional redundant data exchange infrastructure components solely to provide for redundancy during planned or unplanned outages of individual components.

Infrastructure that is not within the TOP's primary Control Center is not addressed by the proposed requirement.

- R19.** Each Transmission Operator shall have data exchange capabilities with the entities it has identified it needs data from in order to perform its Operational Planning Analyses.~~the entities that it has identified that it needs data from in order to maintain reliability in its Transmission Operator Area.~~ [Violation Risk Factor: ~~High~~Medium] [Time Horizon: ~~Operations Planning, Same-Day Operations, Real-time Operations~~]
- M19.** Each Transmission Operator shall have, and provide upon request, evidence that could include, but is not limited to, operator logs, system specifications, system diagrams, or other evidence that it has data exchange capabilities with the entities ~~that it has identified that it needs data from in order to maintain reliability in its Transmission Operator Area~~perform its Operational Planning Analyses.
- R20.** Each Transmission Operator shall have data exchange capabilities, with redundant and diversely routed data exchange infrastructure within the Transmission Operator's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Balancing Authority, and the entities it has identified it needs data from in order for it to perform its Real-time monitoring and Real-time Assessments.

[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]

M20. Each Transmission Operator shall have, and provide upon request, evidence that could include, but is not limited to, system specifications, system diagrams, or other documentation that lists its data exchange capabilities, including redundant and diversely routed data exchange infrastructure within the Transmission Operator's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Balancing Authority, and the entities it has identified it needs data from in order to perform its Real-time monitoring and Real-time Assessments as specified in the requirement.

Rationale for Requirement R21: The proposed requirement addresses directives for testing of data exchange capabilities used in primary Control Centers (FERC Order No. 817 Para 51).

A test for redundant functionality demonstrates that data exchange capabilities will continue to operate despite the malfunction or failure of an individual component. An entity's testing practices should, over time, examine the various failure modes of its data exchange capabilities. When an actual event successfully exercises the redundant functionality, it can be considered a test for the purposes of the proposed requirement.

R21. Each Transmission Operator shall test its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality at least once every 90 calendar days. If the test is unsuccessful, the Transmission Operator shall initiate action within two hours to restore redundant functionality. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M21. Each Transmission Operator shall have, and provide upon request, evidence that it tested its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality, or experienced an event that demonstrated the redundant functionality; and, if the test was unsuccessful, initiated action within two hours to restore redundant functionality as specified in Requirement R21. Evidence could include, but is not limited to: dated and time-stamped test records, operator logs, voice recordings, or electronic communications.

Rationale for Requirements R22 and R23: The proposed changes address directives for redundancy and diverse routing of data exchange capabilities (FERC Order No. 817 Para 47).

Redundant and diversely routed data exchange capabilities consist of data exchange infrastructure components (e.g. switches, routers, file servers, power supplies, and

network cabling and communication paths between these components in the primary Control Center for the exchange of system operating data) that will provide continued functionality despite failure or malfunction of an individual component within the Balancing Authority's (BA) primary Control Center. Redundant and diversely routed data exchange capabilities preclude single points of failure in primary Control Center data exchange infrastructure from halting the flow of Real-time data. Requirement R23 does not require automatic or instantaneous fail-over of data exchange capabilities. Redundancy and diverse routing may be achieved in various ways depending on the arrangement of the infrastructure or hardware within the BA's primary Control Center.

The reliability objective of redundancy is to provide for continued data exchange functionality during outages, maintenance, or testing of data exchange infrastructure. The proposed requirements do not specify additional redundant data exchange infrastructure components solely to provide for redundancy during planned or unplanned outages of individual components.

Infrastructure that is not within the BA's primary Control Center is not addressed by the proposed requirement.

R20-R22. Each Balancing Authority shall have data exchange capabilities with the entities ~~that~~ it has identified ~~that~~ it needs data from in order to develop its Operating Plan for next-day operations. ~~maintain reliability in its Balancing Authority Area.~~ [Violation Risk Factor: ~~High~~Medium] [Time Horizon: Operations Planning, ~~Same-Day Operations, Real-time Operations~~]

M20. Each Balancing Authority shall have, and provide upon request, evidence that could include, but is not limited to, operator logs, system specifications, system diagrams, or other evidence that it has data exchange capabilities with the entities ~~that~~ it has identified ~~that~~ it needs data from in order to ~~maintain reliability in its Balancing Authority Area~~ develop its Operating Plan for next-day operations.

R23. Each Balancing Authority shall have data exchange capabilities, with redundant and diversely routed data exchange infrastructure within the Balancing Authority's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Transmission Operator, and the entities it has identified it needs data from in order for it to perform its Real-time monitoring and analysis functions. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]

M23. Each Balancing Authority shall have, and provide upon request, evidence that could include, but is not limited to, system specifications, system diagrams, or other documentation that lists its data exchange capabilities, including redundant and diversely routed data exchange infrastructure within the Balancing Authority's primary

Control Center, for the exchange of Real-time data with its Reliability Coordinator, Transmission Operator, and the entities it has identified it needs data from in order to perform its Real-time monitoring and analysis functions as specified in the requirement.

Rationale for Requirement R24: The proposed requirement addresses directives for testing of data exchange capabilities used in primary Control Centers (FERC Order No. 817 Para 51).

A test for redundant functionality demonstrates that data exchange capabilities will continue to operate despite the malfunction or failure of an individual component. An entity's testing practices should, over time, examine the various failure modes of its data exchange capabilities. When an actual event successfully exercises the redundant functionality, it can be considered a test for the purposes of the proposed requirement.

R24. Each Balancing Authority shall test its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality at least once every 90 calendar days. If the test is unsuccessful, the Balancing Authority shall initiate action within two hours to restore redundant functionality. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

M24. Each Balancing Authority shall have, and provide upon request, evidence that it tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality, or experienced an event that demonstrated the redundant functionality; and, if the test was unsuccessful, initiated action within two hours to restore redundant functionality as specified in Requirement R24. Evidence could include, but is not limited to: dated and time-stamped test records, operator logs, voice recordings, or electronic communications.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

~~As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” (CEA) means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable the NERC Reliability Standards in their respective jurisdictions.~~

~~1.2. Compliance Monitoring and Assessment Processes~~

~~As defined in the NERC Rules of Procedure, “Compliance Monitoring and Assessment Processes” refers to the identification of the processes that will be~~

~~used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.~~

1.3.1.2. Data Evidence Retention

~~The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.~~

~~The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation. The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.~~

Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider shall each keep data or evidence for each applicable Requirement R1 through R11, and ~~R15 through R20 and~~ Measure M1 through M11, ~~and M15 through M20~~, for the current calendar year and one previous calendar year, with the exception of operator logs and voice recordings which shall be retained for a minimum of ~~ninety~~90 calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

Each Transmission Operator shall retain evidence for three calendar years of any occasion in which it has exceeded an identified IROL and its associated IROL T_v as specified in Requirement R12 and Measure M12.

~~and that it initiated its Operating Plan to mitigate a SOL exceedance as specified in Requirement R14 and Measurement M14.~~

Each Transmission Operator shall keep data or evidence for Requirement R13 and Measure M13 for a rolling 30-day period, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

Each Transmission Operator shall retain evidence and that it initiated its Operating Plan to mitigate a SOL exceedance as specified in Requirement R14 and Measurement M14 for three calendar years.

Each Transmission Operator and Balancing Authority shall each keep data or evidence for each applicable Requirement R15 through R20, and Measure M15

through M20 for the current calendar year and one previous calendar year, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days.

Each Transmission Operator shall keep evidence for Requirement R21 and Measure M21 for the most recent twelve calendar months, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days.

Each Balancing Authority shall each keep data or evidence for each applicable Requirement R22 through R23, and Measure M22 through M23 for the current calendar year and one previous calendar year, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days.

Each Balancing Authority shall keep evidence for Requirement R24 and Measure M24 for the most recent twelve calendar months, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days.

~~If a Balancing Authority, Transmission Operator, Generator Operator, or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or the time period specified above, whichever is longer.~~

~~The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.~~

1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

1.4. Additional Compliance Information

~~None.~~

Table of Compliance Elements

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	N/A	N/A	N/A	The Transmission Operator failed to act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.
R2	N/A	N/A	N/A	The Balancing Authority failed to act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.
R3	N/A	N/A	N/A	The responsible entity did not comply with an Operating Instruction issued by the Transmission Operator, and such action could have been physically implemented and would not have violated safety, equipment, regulatory, or statutory requirements.
R4	N/A	N/A	N/A	The responsible entity did not inform its Transmission Operator of its inability to comply with an Operating Instruction issued by its Transmission Operator.

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R5	N/A	N/A	N/A	The responsible entity did not comply with an Operating Instruction issued by the Balancing Authority, and such action could have been physically implemented and would not have violated safety, equipment, regulatory, or statutory requirements.
R6	N/A	N/A	N/A	The responsible entity did not inform its Balancing Authority of its inability to comply with an Operating Instruction issued by its Balancing Authority.
R7	N/A	N/A	N/A	The Transmission Operator did not provide comparable assistance to other Transmission Operators within its Reliability Coordinator Area, when requested and able, and the requesting entity had implemented its Emergency procedures, and such actions could have been physically implemented and would not have violated safety, equipment, regulatory, or statutory requirements.

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R8	<p>The Transmission Operator did not inform one known impacted Transmission Operator or 5% or less of the known impacted Transmission Operators, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Transmission Operator Areas.</p> <p>OR,</p> <p>The Transmission Operator did not inform one known impacted Balancing Authorities or 5% or less of the known impacted Balancing Authorities, whichever is greater, of its actual or</p>	<p>The Transmission Operator did not inform two known impacted Transmission Operators or more than 5% and less than or equal to 10% of the known impacted Transmission Operators, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Transmission Operator Areas.</p> <p>OR,</p> <p>The Transmission Operator did not inform two known impacted Balancing Authorities or more than 5% and less than or equal to 10% of the known impacted Balancing Authorities,</p>	<p>The Transmission Operator did not inform three known impacted Transmission Operators or more than 10% and less than or equal to 15% of the known impacted Transmission Operators, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Transmission Operator Areas.</p> <p>OR,</p> <p>The Transmission Operator did not inform three known impacted Balancing Authorities or more than 10% and less than or equal to 15% of the known impacted Balancing Authorities, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an</p>	<p>The Transmission Operator did not inform its Reliability Coordinator of its actual or expected operations that resulted in, or could have resulted in, an Emergency on those respective Transmission Operator Areas.</p> <p>OR</p> <p>The Transmission Operator did not inform four or more known impacted Transmission Operators or more than 15% of the known impacted Transmission Operators of its actual or expected operations that resulted in, or could have resulted in, an Emergency on those respective Transmission Operator Areas.</p> <p>OR,</p> <p>The Transmission Operator did not inform four or more known impacted Balancing Authorities or more than 15% of the known impacted Balancing Authorities of its actual or expected operations that resulted in, or could have</p>

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	expected operations that resulted in, or could have resulted in, an Emergency on respective Balancing Authority Areas.	whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Balancing Authority Areas.	Emergency on respective Balancing Authority Areas.	resulted in, an Emergency on respective Balancing Authority Areas.
R9	The responsible entity did not notify one known impacted interconnected entity or 5% or less of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or associated communication channels between the affected entities.	The responsible entity did not notify two known impacted interconnected entities or more than 5% and less than or equal to 10% of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or associated communication channels between the affected entities.	The responsible entity did not notify three known impacted interconnected entities or more than 10% and less than or equal to 15% of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or associated communication channels between the affected entities.	The responsible entity did not notify its Reliability Coordinator of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels. OR, The responsible entity did not notify four or more known impacted interconnected entities or more than 15% of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and

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R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				assessment capabilities, or associated communication channels between the affected entities.
R10	The Transmission Operator did not monitor, obtain, or utilize one of the items required or identified as necessary by the Transmission Operator and listed in Requirement R10, Part 10.1 through 10.6. N/A	The Transmission Operator did not monitor, <u>obtain, or utilize two</u> of the items <u>required or identified as necessary by the Transmission Operator</u> and listed in Requirement R10, Part 10.1- <u>through 10.6.</u> OR, The Transmission Operator did not obtain and utilize one of the items listed in Requirement R10, Part 10.2.	The Transmission Operator did not monitor, <u>obtain, or utilize three</u> of the items <u>required or identified as necessary by the Transmission Operator</u> and listed in Requirement R10, Part 10.1 <u>through 10.6</u> and <u>did not obtain and utilize one of the items listed in Requirement R10, Part 10.2.</u>	The Transmission Operator did not monitor, <u>obtain, or utilize four or more of the items required or identified as necessary by the Transmission Operator</u> and listed in <u>Requirement R10 Part 10.1 through 10.6.</u> Facilities and the status of Special Protection Systems within its Transmission Operator Area and did not obtain and utilize data deemed as necessary from outside its Transmission Operator Area.
R11	N/A	N/A	The Balancing Authority did not monitor the status of Special Protection System Remedial Action Schemes that impact	The Balancing Authority did not monitor its Balancing Authority Area, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
			generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.	support Interconnection frequency.
R12	N/A	N/A	N/A	The Transmission Operator exceeded an identified Interconnection Reliability Operating Limit (IROL) for a continuous duration greater than its associated IROL T _v .
R13	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for one 30-minute period within that 24-hour period.	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for two 30-minute periods within that 24-hour period.	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for three 30-minute periods within that 24-hour period.	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for four or more 30-minute periods within that 24-hour period.
R14.	N/A	N/A	N/A	The Transmission Operator did not initiate its Operating Plan for mitigating a SOL exceedance identified as part

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				of its Real-time monitoring or Real-time Assessment
R15.	N/A	N/A	N/A	The Transmission Operator did not inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL had been exceeded.
R16.	N/A	N/A	N/A	The Transmission Operator did not provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.
R17.	N/A	N/A	N/A	The Balancing Authority did not provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				channels between affected entities.
R18	N/A	N/A	N/A	The Transmission Operator failed to operate to the most limiting parameter in instances where there was a difference in SOLs.
R19	The Transmission Operator did not have data exchange capabilities <u>for performing its Operational Planning Analyses</u> with one identified entity, or 5% or less of the applicable entities, whichever is greater.	The Transmission Operator did not have data exchange capabilities <u>for performing its Operational Planning Analyses</u> with two identified entities, or more than 5% or less than or equal to 10% of the applicable entities, whichever is greater.	The Transmission Operator did not have data exchange capabilities <u>for performing its Operational Planning Analyses</u> with three identified entities, or more than 10% or less than or equal to 15% of the applicable entities, whichever is greater.	The Transmission Operator did not have data exchange capabilities <u>for performing its Operational Planning Analyses</u> with four or more identified entities or greater than 15% of the applicable entities, whichever is greater.
<u>R20</u>	<u>N/A</u>	<u>N/A</u>	<u>The Transmission Operator had data exchange capabilities with its Reliability Coordinator, Balancing Authority, and identified entities for performing Real-time monitoring and Real-time</u>	<u>The Transmission Operator did not have data exchange capabilities with its Reliability Coordinator, Balancing Authority, and identified entities for performing Real-time monitoring and Real-time Assessments as specified in the Requirement.</u>

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
			<u>Assessments, but did not have redundant and diversely routed data exchange infrastructure within the Transmission Operator's primary Control Center, as specified in the Requirement.</u>	
<u>R21</u>	<u>The Transmission Operator tested its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality, but did so more than 90 calendar days but less than or equal to 120 calendar days since the previous test;</u> <u>OR</u> <u>The Transmission Operator tested its primary Control Center data</u>	<u>The Transmission Operator tested its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality, but did so more than 120 calendar days but less than or equal to 150 calendar days since the previous test;</u> <u>OR</u> <u>The Transmission Operator tested its primary Control Center data exchange capabilities specified in Requirement R20</u>	<u>The Transmission Operator tested its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality, but did so more than 150 calendar days but less than or equal to 180 calendar days since the previous test;</u> <u>OR</u> <u>The Transmission Operator tested its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality</u>	<u>The Transmission Operator tested its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality, but did so more than 180 calendar days since the previous test;</u> <u>OR</u> <u>The Transmission Operator did not test its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality;</u> <u>OR</u> <u>The Transmission Operator tested its primary Control Center data exchange</u>

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R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	<u>exchange capabilities specified in Requirement R20 for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 2 hours and less than or equal to 4 hours.</u>	<u>for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 4 hours and less than or equal to 6 hours.</u>	<u>at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 6 hours and less than or equal to 8 hours.</u>	<u>capabilities specified in Requirement R20 for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 8 hours.</u>
<u>R20R 22</u>	The Balancing Authority did not have data exchange capabilities <u>for developing its Operating Plan</u> with one identified entity, or 5% or less of the applicable entities, whichever is greater.	The Balancing Authority did not have data exchange capabilities <u>for developing its Operating Plan</u> with two identified entities, or more than 5% or less than or equal to 10% of the applicable entities, whichever is greater.	The Balancing Authority did not have data exchange capabilities <u>for developing its Operating Plan</u> with three identified entities, or more than 10% or less than or equal to 15% of the applicable entities, whichever is greater.	The Balancing Authority did not have data exchange capabilities <u>for developing its Operating Plan</u> with four or more identified entities or greater than 15% of the applicable entities, whichever is greater.
<u>R23</u>	<u>N/A</u>	<u>N/A</u>	<u>The Balancing Authority had data exchange</u>	<u>The Balancing Authority did not have data exchange</u>

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p><u>capabilities with its Reliability Coordinator, Transmission Operator, and identified entities for performing Real-time monitoring and analysis functions, but did not have redundant and diversely routed data exchange infrastructure within the Balancing Authority's primary Control Center, as specified in the Requirement.</u></p>	<p><u>capabilities with its Reliability Coordinator, Transmission Operator, and identified entities for performing Real-time monitoring and analysis functions as specified in the Requirement.</u></p>
R24	<p><u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality, but did so more than 90 calendar days but less than or equal to 120 calendar days since the previous test;</u></p>	<p><u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality, but did so more than 120 calendar days but less than or equal to 150 calendar days since the previous test;</u> <u>OR</u></p>	<p><u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality, but did so more than 150 calendar days but less than or equal to 180 calendar days since the previous test;</u> <u>OR</u></p>	<p><u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality, but did so more than 180 calendar days since the previous test;</u> <u>OR</u> <u>The Balancing Authority did not test its primary Control Center data exchange capabilities specified in</u></p>

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	<p><u>OR</u> <u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 2 hours and less than or equal to 4 hours.</u></p>	<p><u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 4 hours and less than or equal to 6 hours.</u></p>	<p><u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 6 hours and less than or equal to 8 hours.</u></p>	<p><u>Requirement R23 for redundant functionality;</u> <u>OR</u> <u>The Balancing Authority tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality at least once every 90 calendar days but, following an unsuccessful test, initiated action to restore the redundant functionality in more than 8 hours.</u></p>

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

The [SDTProject 2014-03 SDT](#) has created the SOL Exceedance White Paper as guidance on SOL issues and the URL for that document is:

<http://www.nerc.com/pa/stand/Pages/TOP0013RI.aspx>.

Operating Plan - An Operating Plan includes general Operating Processes and specific Operating Procedures. It may be an overview document which provides a prescription for an Operating Plan for the next-day, or it may be a specific plan to address a specific SOL or IROL exceedance identified in the Operational Planning Analysis (OPA). Consistent with the NERC definition, Operating Plans can be general in nature, or they can be specific plans to address specific reliability issues. The use of the term Operating Plan in the revised TOP/IRO standards allows room for both. An Operating Plan references processes and procedures, including electronic data exchange, which are available to the System Operator on a daily basis to allow the operator to reliably address conditions which may arise throughout the day. It is valid for tomorrow, the day after, and the day after that. Operating Plans should be augmented by temporary operating guides which outline prevention/mitigation plans for specific situations which are identified day-to-day in an OPA or a Real-time Assessment (RTA). As the definition in the Glossary of Terms states, a restoration plan is an example of an Operating Plan. It contains all the overarching principles that the System Operator needs to work his/her way through the restoration process. It is not a specific document written for a specific blackout scenario but rather a collection of tools consisting of processes, procedures, and automated software systems that are available to the operator to use in restoring the system. An Operating Plan can in turn be looked upon in a similar manner. It does not contain a prescription for the specific set-up for tomorrow but contains a treatment of all the processes, procedures, and automated software systems that are at the operator's disposal. The existence of an Operating Plan, however, does not preclude the need for creating specific action plans for specific SOL or IROL exceedances identified in the OPA. When a Reliability Coordinator performs an OPA, the analysis may reveal instances of possible SOL or IROL exceedances for pre- or post-Contingency conditions. In these instances, Reliability Coordinators are expected to ensure that there are plans in place to prevent or mitigate those SOLs or IROLs, should those operating conditions be encountered the next day. The Operating Plan may contain a description of the process by which specific prevention or mitigation plans for day-to-day SOL or IROL exceedances identified in the OPA are handled and communicated. This approach could alleviate any potential administrative burden associated with perceived requirements for continual day-to-day updating of "the Operating Plan document" for compliance purposes.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
1a	May 12, 2010	Added Appendix 1 – Interpretation of R8 approved by Board of Trustees on May 12, 2010	Interpretation
1a	September 15, 2011	FERC Order issued approved the Interpretation of R8 (FERC Order became effective November 21, 2011)	Interpretation
2	May 6, 2012	Revised under Project 2007-03	Revised
2	May 9, 2012	Adopted by Board of Trustees	Revised
3	February 12, 2015	Adopted by Board of Trustees	Revisions under Project 2014-03
3	November 19, 2015	FERC approved TOP-001-3. Docket No. RM15-16-000. Order No. 817.	
<u>4</u>	<u>June 2016</u>	<u>Revised under Project 2016-01</u>	<u>Revised</u>

Guidelines and Technical Basis

None

Rationale

During development of TOP-001-4, text boxes are embedded within the standard to explain the rationale for various parts of the standard. Upon Board adoption of TOP-001-4, the text from the rationale text boxes will be moved to this section.

Rationale text from the development of TOP-001-3 in Project 2014-03 follows. Additional information can be found on the Project 2014-03 project page.

Rationale:

~~During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.~~

Rationale for Requirement R3:

The phrase ‘cannot be physically implemented’ means that a Transmission Operator may request something to be done that is not physically possible due to its lack of knowledge of the system involved.

Rationale for Requirement R10:

New proposed Requirement R10 is derived from approved IRO-003-2, Requirement R1, adapted to the Transmission Operator Area. This new requirement is in response to NOPR paragraph 60 concerning monitoring capabilities for the Transmission Operator. New Requirement R11 covers the Balancing Authorities. Monitoring of external systems can be accomplished via data links.

Rationale for Requirement R13:

The new Requirement R13 is in response to NOPR paragraphs 55 and 60 concerning Real-time analysis responsibilities for Transmission Operators and is copied from approved IRO-008-1, Requirement R2. The Transmission Operator’s Operating Plan will describe how to perform the Real-time Assessment. The Operating Plan should contain instructions as to how to perform Operational Planning Analysis and Real-time Assessment with detailed instructions and timing requirements as to how to adapt to conditions where processes, procedures, and automated software systems are not available (if used). This could include instructions such as an indication that no actions may be required if system conditions have not changed significantly and that previous Contingency analysis or Real-time Assessments may be used in such a situation.

Rationale for Requirement R14:

The original Requirement R8 was deleted and original Requirements R9 and R11 were revised in order to respond to NOPR paragraph 42 which raised the issue of handling all SOLs and not just a sub-set of SOLs. The SDT has developed a white paper on SOL exceedances that explains its intent on what needs to be contained in such an Operating Plan. These Operating Plans are developed and documented in advance of Real-time and may be developed from Operational Planning Assessments required per proposed TOP-002-4 or other assessments. Operating Plans could be augmented by temporary operating guides which outline prevention/mitigation plans for specific situations which are identified day-to-day in an Operational Planning Assessment or a Real-time Assessment. The intent is to have a plan and philosophy that can be followed by an operator.

Rationale for Requirements R16 and R17:

In response to IERP Report recommendation 3 on authority.

Rationale for Requirement R18:

Moved from approved IRO-005-3.1a, Requirement R10. Transmission Service Provider, Distribution Provider, Load-Serving Entity, Generator Operator, and Purchasing-Selling Entity are deleted as those entities will receive instructions on limits from the responsible entities cited in the requirement. Note – Derived limits replaced by SOLs for clarity and specificity. SOLs include voltage, Stability, and thermal limits and are thus the most limiting factor.

Rationale for Requirements R19 and R20 (R19, R20, R22, and R23 in TOP-001-4):

Added for consistency with proposed IRO-002-4, Requirement R1. Data exchange capabilities are required to support the data specification concept in proposed TOP-003-3.