

Meeting Notes

Project 2018-03 Standards Efficiency Review Retirements

April 17-18, 2019

NERC
Atlanta, GA

Administrative

1. Introductions

The meeting was brought to order by the Chair, Charles Rogers, at 9:00 a.m. Eastern on Wednesday, April 17, 2019. Colin Brown, NERC staff, provided the team with building and safety information/logistics. Participants were introduced and those in attendance were:

Name	Company	Member/ Observer	In-person (Y/N)	Conference Call/Web (Y/N)
Charles Rogers	Consumers Energy	M	Y	
Robert Staton	Xcel Energy	M	Y	
Mark Pratt	Southern Company	O	Y	
Stephen Wendling	American Transmission Company	M	Y	
James Williams	SPP	M	Y	
Michael Cruz-Montes	CenterPoint Energy	O	Y	
Guy Zito	NPCC	O	Y	
Karie Barczak	DTE Energy	M	Y	
Gerald Keenan	NWPP	M		N
Mario Kiresich	Southern California Edison	M		Y

Name	Company	Member/ Observer	In-person (Y/N)	Conference Call/Web (Y/N)
Thomas Leslie	Georgia Transmission Corp.	M		Y
John Allen	City Utilities	O		Y
Michael Steckelberg	Great River Energy	M	Y	
Kim VanBrimer	SPP	O		Y
David O'Connor	FERC	O	Y	
Juan Luz	FERC	O	Y	
Laura Anderson	NERC	NERC Staff	Y	
Lauren Perotti	NERC	NERC Staff		Y

2. Determination of Quorum

The rule for NERC Standard Drafting Team (SDT or team) states that a quorum requires two-thirds of the voting members of the SDT. Quorum was achieved as 8 of 10 total members were present.

3. NERC Antitrust Compliance Guidelines and Public Announcement

NERC Antitrust Compliance Guidelines and public announcement were reviewed by Laura Anderson. There were no questions raised.

4. Roster Updates

The team reviewed the team roster and confirmed that it was accurate and up to date.

Agenda

1. Review of Agenda

Laura Anderson, NERC staff announced initial ballot results.

Standard	Quorum / Approval
FAC-008-4	90.22% / 95.74%
FAC-013-2	90.97% / 97.66%
INT-004-3.1	90.85% / 95.94%
INT-006-5	90.94% / 96.64%
INT-009-3	90.94% / 97.22%
INT-010-2.1	90.88% / 90.19%
IRO-002-6	90.60% / 97.19%
MOD-001-1a	90.26% / 95.47%
MOD-001-2	90.43% / 94.63%
MOD-004-1	90.32% / 94.34%
MOD-008-1	90.26% / 94.69%
MOD-020-0	90.65% / 96.59%
MOD-028-2	90.13% / 95.28%
MOD-029-2a	90.13% / 95.41%
MOD-030-3	89.84% / 94.55%
PRC-004-6	90.06% / 87.12%
TOP-001-5	90.03% / 97.75%
VAR-001-6	89.56% / 96.57%

2. Discussions of IRO-002-6 WECC Variance and associated documents

The version number for IRO-002-6 will be IRO-002-7 for final ballot due to the WECC Variance. As the project progresses to the Board of Trustee for adoption of the standards, the SDT is informed that the version for this standard is IRO-002-7.

3. It is the recommendation of the SDT that the INT-010 reference that is within INT-009-2.1, Requirement R1 should be struck from the standard. The SDT finds this would:

- a. Be consistent with the SAR's recommendation to retire INT-010-2;
- b. Constitute a non-substantive change that may be made prior to final ballot;
- c. Result in no change to the purpose and intent of the requirement; and
- d. That no further changes to this requirement are necessary.

4. A short discussion was held on regarding feedback on the industry webinar.

5. The team broke into small groups to further develop technical justifications and to help draft responses to comments received. Charlie Rogers led the MOD discussion, Robert Staton led the IRO/TOP/VAR discussions. The added technical justifications for each of these standards were drafted into the [Technical Justification](#) document.

The SDT developed additional background for the Technical Justification document:

The North American Electric Reliability Corporation (NERC) Project 2018-03 – Standards Efficiency Review (SER) Retirements, was established for the Standard Drafting Team (SDT) to evaluate each recommendation for retirement identified in the Standard Authorization Request (SAR). The Reliability Standards have their origins in the voluntary consensus Operating Guides and Planning Standards. These original documents were modified into what we currently know as the “Version 0” standards. The objective of the added granularity to the requirements was to support the reliable operation of the Bulk Electric System (BES). These requirements were prescriptive, and meant to provide an industry-wide approach to achieving the reliability objectives of the standards. In the last 10 years, the industry has matured and adopted compliance through the Reliability Standards, and the continuance of the added granularity of the requirements do not contribute to the efficiency and effectiveness of Reliability Standards. In 2010, NERC determined that absolute, “do exactly as the standard dictates” requirements, in some cases, did not satisfy the reliability goal and required the entity to perform specific actions to be compliant, while not effectively adding to the overall reliability goal. NERC then embarked on a shift in the standards paradigm to what is now known as ‘results-based standards,’ wherein the standards specify what reliability results from the requirements, while affording entities flexibility in achieving those results.

Breakdown of SDT recommendations:

- a. EOP-005-3, Requirement R8 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirement R8 during the team’s future development of the project. If Requirement R8 in EOP-005-3 is removed, then there will not be

any requirements to provide System restoration training to operating personnel in any of the Reliability Standards. The SDT discussed EOP-005-3, Requirement R8 as being a candidate for review in Phase II.

b. EOP-006-3, Requirement R7 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirement R7 during the team's future development of the project. If Requirement R7 in EOP-006-3 is removed, then there will not be any requirements to provide System restoration training to operating personnel in any of the Reliability Standards. The SDT discussed EOP-006-3, Requirement R7 as being a candidate for review in Phase II.

c. COM-002-4, Requirement R2 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirement R2 during the team's future development of the project. While training on communications protocols would fall into an entity's systematic approach to training, the requirements do not explicitly mandate training on communications protocols. The SDT discussed COM-002-4, Requirement R2 as being a candidate for review in Phase II.

d. PRC-004-5(i), Requirement R4 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire Requirement R4 during the team's future development of the project. The compliance activities associated with this requirement fall into tracking of milestones and do not improve reliability. Requirement R4 acts as a control to support compliance with Requirements R1 and R3.

e. VAR-001-5, Requirements R2 and R3 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirements R16 and R17 during the team's future development of the project. For reliability purposes, the TOP must ensure sufficient voltage support is provided in Real-time in order to operate within an SOL to prevent voltage-collapse events wherein the operation within SOLs/IROLs itself is not adequate to assure stable voltage operations in both steady-state and transient.

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire VAR-001-5, Requirement R2 during future development for the following reasons: VAR-001-5, Requirement R2 is duplicative with the existing requirements in the TOP-001-4 and TOP-002-4, which direct the TOP to plan and operate within in SOL values, which includes system voltage limits. TOP-002-4, Requirement R1 requires an OPA to be completed to ensure no SOL is violated, and TOP-001-4, Requirement R10 provides the criteria that the TOP shall use for determining SOL exceedances, which includes monitoring voltages. If an SOL violation is identified, then the TOP shall have an Operating Plan to mitigate the violation. TOP-001-4 and TOP-002-4 requirements direct the

TOP to maintain reliability of the BES and to mitigate SOL exceedances. If the TOP identifies no SOLs, voltage or otherwise, then the TOP has enough resources "scheduled" to maintain reliability of its BES. The remaining VAR-001-4.2 requirements ensure that a TOP ensures voltage, reactive flows, and reactive resources are monitored, controlled, and maintained with limits. The FAC family of standards ensure the proper BES Facilities and/or Elements are built with applicable equipment and system ratings.

f. See Item Number L.

g. FAC-013-2 Requirements R1, R2, R4, R5 and R6 (all) | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire FAC-008-3 during future development for the following reasons: The requirement for PCs to have a methodology for and to perform an annual assessment of Transfer Capability for a single year in the Near-Term Transmission Planning Horizon does not benefit System reliability beyond that provided by other Reliability Standards. This Reliability Standard is primarily administrative in nature and does not require specific performance metrics or coordination among functional entities.

h. IRO-017-1, Requirement R3 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirement R3 during the team's future development of the project. IRO-017-1 is not entirely duplicative of TPL-001-4, Requirement R8. The RC should be added as a named recipient to TPL-001-4 prior to considering IRO-017-1, Requirement R3, for retirement. The SDT discussed IRO-017-3, Requirement R3 as being a candidate for review in Phase II.

i. INT-009-2.1, Requirement R2 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire INT-009-2.1 Requirement R2 during future development for the following reasons: This requirement can be retired under Paragraph 81, Criterion B7. INT-009-2.1, Requirement R2, is redundant with the approved NERC Reliability Standard BAL-005-1, Requirement R7.

j. TOP-001-4 Requirements R16, R17, R19 and R22 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirements R16 and R17 during the team's future development of the project. Requirements R16 and R17 of TOP-001-4 need to be retained to make it clear that the System Operator (SO) has authority to postpone, cancel or recall planned outages of Energy Management System (EMS), IT or communications-related equipment.

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire TOP-001-4, Requirements R19 and R22 during future development for the following reasons: TOP-001-4, Requirements R19 and R22, are redundant to other requirements in the Transmission Operations (TOP) family of standards.

k. BAL-005-1, Requirements R4 and R6 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirements R4 and R6 during the team's future development of the project. Requirements R4 and R6 of BAL-005-1 are requirements specific to the calculation of the Area Control Error (ACE). The SDT discussed BAL-005-1, Requirements R4 and R6 as being candidates for review in Phase II.

l. MOD-004-1, MOD-008-1, MOD-020-0, MOD-028-2, MOD-029-2a, MOD-030-3, MOD-001-1a and proposed MOD-001-2 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire each of these standards in their entirety (and withdrawal of MOD-001-2) during the team's future development of the project.

m. See Item Number L.

n. IRO-014-3, Requirement R3 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirement R3 during the team's future development of the project. The reliability objective of "notification" is mandated as a part of the RC having and implementing Operating Procedures, Operating Processes, or Operating Plans that include criteria and processes for notifications; this ensures RC operations are coordinated to maintain reliability of the BES. The SDT discussed IRO-014-3, Requirement R3 as being a candidate for review in Phase II.

o. INT-006-4, Requirements R3.1, R4, and R5 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire INT-006-4 Requirements R3.1, R4 and R5 during future development for the following reasons: INT-006-4, Requirement R3 Part 3.1 can be retired under Paragraph 81, Criterion A. There is no substantive impact on reliability with requiring the RC to be notified when a Reliability Adjustment Arranged Interchange has been denied. INT-006-4, Requirement R4 can be retired under Paragraph 81, Criteria A and B7. Covered in NAESB. INT-006-4, Requirement R5 can be retired under Paragraph 81, Criteria A and B7. This is covered in NAESB e-Tagging specifications.

p. FAC-008-3, Requirements R7 and R8 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire FAC-008-3 Requirements R7 and R8 during future development for the following reasons: These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3.

q. INT-004-3.1 Requirements R1, R2 and R3 (all) | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire INT-004-3.1 during future development for the following reasons: INT-004-3.1 may be retired since it satisfies Paragraph 81 Criteria 'B6 –

Commercial or Business Practice.’ Interchange scheduling and congestion are elements that impact transmission costs, rather than actual reliable management of the BES. Furthermore, the applicable entity for Requirements R1 and R2, the Purchasing-Selling Entity (PSE), has been removed from the list of NERC Functional Entities.

r. INT-010-2.1 Requirements R1, R2 and R3 (all) | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire INT-010-2.1 during future development for the following reasons: Retire under Paragraph 81, Criteria B6 and B7 and the IERP also recommended INT-010-2.1, Requirements R1, R2 and R3 for retirement.

s. IRO-002-5, Requirements R1, R4 and R6 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirements R4 and R6 during the team’s future development of the project. IRO-002-5, Requirements R4 and R6 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES; therefore, retirement of these requirements is not being sought during this phase of the project.

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retire IRO-002-5, Requirement R1 during future development for the following reasons: Requirement R1 of IRO-002-5 is redundant to other requirements in the Interconnection Reliability Operations and Coordination (IRO) family of standards. Requirement R1 and data exchange for the Operational Planning Assessment (OPA) is inherent to Requirement R2 that has a higher Violation Risk Factor (VRF) and is tied to the OPA in IRO-010-2, Requirement R3.

t. IRO-008-2, Requirement R6 | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirement R6 during the team’s future development of the project. Although IRO-008-2, Requirement R6, appears to be administrative in nature, there are reliability benefits to knowing what actions were taken to prevent or mitigate the exceedance.

u. PRC-015-1 Requirements R1, R2, and R3 (all) | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirements R1, R2 and R3 during the team’s future development of the project. PRC-015-1 is scheduled to be retired on 12/31/2020 under the PRC-012-2 Implementation Plan (IP).

v. PRC-018-1 Requirements R1, R2, R3, R4, R5 and R6 (all) | SAR Recommendation: Retire

Based on industry comments received and SDT discussion, the SDT responded to comments with a determination that the SDT should retain Requirements R1, R2, R3, R4, R5 and R6 during the team’s future development of the project. PRC-018-1 is superseded by PRC-002-2 in Year

2022. The PRC-002-2 IP states: “Standard PRC-018-1 shall remain effective throughout the phased implementation period of PRC-002-2...”

6. The SDT is taking this project to final posting. Final responses to comments were drafted and all documents were reviewed for the posting.
7. Laura Anderson, NERC staff, discussed with the team next steps for this project, including Board of Trustees meeting in May 2019 (if all standards pass) for adoption and then will be filed at FERC.
8. **Adjourn**
The meeting adjourned at 3:23 p.m. Eastern on April 18, 2019.