

Meeting Notes

Project 2015-04 Alignment of Terms

Standards Authorization Request (SAR) Drafting Team Meeting

Thursday, February 19, 2015 | 8:00 AM – 5:00 PM, CST
Friday, February 20, 2015 | 8:00 AM – 12:00 PM, CST

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Meeting Attendees:

Name	Company	Member/ Observer	In-person (IP) / Web (W)	
			2/19	2/20
Jerry Rust	Northwest Power Pool	Chair	IP	IP
Chris Scanlon	Exelon	Vice-chair	IP	IP
Mark Cole	Georgia System Operation Corporation	Member	W	W
Jill Loewer	Utility Services, Inc.	Member	IP	IP
Diana McMahon	Salt River Project	Member	IP	IP
Shannon Mickens	Southwest Power Pool, Inc.	Member	IP	IP
Heather Moreno	Luminant Energy	Member	IP	IP
Kristina Pacovsky	ReliabilityFirst	Member	IP	IP
Wayne Van Liere	LG&E and KU	Member	IP	IP
Suzanne McBride	Federal Energy Regulatory Commission	FERC staff	IP	IP
Kenneth Hubona	Federal Energy Regulatory Commission	FERC staff	W	W
Lacey Ourso	NERC – Standards	NERC	IP	IP
Scott Barfield-McGinnis	NERC – Standards	NERC	IP	IP
Lauren Perotti	NERC – Legal	NERC	IP	IP
Joe Amato	MidAmerican Energy Company	Observer	W	W

Name	Company	Member/ Observer	In-person (IP) / Web (W)	
			2/19	2/20
Andrew Puztai	American Transmission Company	Observer	W	W
Andrew Gallo	Austin Energy	Observer	-	W
Bob Thomas	Illinois Municipal Electric Agency (IMEA)	Observer	-	W

Agenda Item 2 - NERC Antitrust Compliance Guidelines and Public Announcement

At the start of the meeting on both days, the NERC Antitrust Compliance Guidelines and public disclaimer were presented to the team.

Agenda Item 3 - Overview and brief history of the NERC Glossary of Terms and Definitions Used in the Rules of Procedure

The group was provided with an overview and history of the [Glossary of Terms Used in NERC Reliability Standards](#) (Glossary). A team member inquired as to whether the NERC Glossary became effective at the same time that the Version 0 standards went into effect. NERC staff reviewed [FERC Order No. 693](#) approving the Glossary and then outlined the revision process for Glossary terms (specifically Section 5 of the Standards Process Manual). The team chair reminded everyone that the Glossary terms apply only to Reliability Standards; it was noted that there is a misperception in the industry that the terms apply broadly to other NERC resources. A member of the team inquired as to how the project came about. NERC staff explained that NERC received a number of questions and comments about aligning the terms between the two resources; it was noted that these comments were received informally but no individual or entity formally submitted a Standards Authorization Request (SAR).

NERC staff provided an overview and history of the [NERC Rules of Procedure](#) (ROP), including a review of the defined terms in Appendix 2 and the process for making revisions to the ROP pursuant to Section 1400. A SDT member pointed out that revisions to the ROP are posted for industry comment, but revisions do not have to go through the balloting process required by the SPM. Also, it was noted that the audience for ROP amendments is different for a registered ballot body.

The team discussed other NERC documents that make use of various defined terms, including the [NERC Functional Model](#). The SDT chair noted that as revisions are made to defined terms, the team should keep in mind the impacts to other NERC documents, such as the Functional Model and Compliance Registration and Certification.

Agenda Item 4 - Roundtable discussion regarding “alignment” issues identified by drafting team members and scope of project

A question was raised regarding whether it would be beneficial to combine the Glossary and ROP into one source that contains all of the NERC “defined terms.” The group discussed the idea, including the pros and cons and various restraints in existence for taking such steps. The group also discussed the fact that the definition application is limited to the particular source of the defined term, and the various resources are revised in different manners, by different rules and groups. For example, it was noted

that terms defined in the ROP are not balloted by industry, but Glossary terms are balloted. Therefore, if the two were consolidated, changes to ROP terms would result in Glossary term changes being made outside of the industry stakeholder process. It was suggested that having one document that identifies all of the defined terms (somewhat similar to an index) would be helpful. Another suggestion was that for cross-over terms, the ROP narrative should only reference/adopt the Glossary narrative, instead of “repeating” the Glossary narrative. That way, if changes are made to the Glossary in the future, the ROP version would be updated because it adopts the Glossary version.

It was noted that some Reliability Standards seem to expand the definition of certain Functional Entities, in a manner that is inconsistent with the Functional Model. For example, PER-005-2 (Operations Personnel Training) provides that a Transmission Owner “that has Personnel, excluding field switching personnel, who can act independently to operate or direct the operation of the Transmission Owner’s Bulk Electric System transmission Facilities in Real-time.” (See Requirement 4.1.4)

The group had a roundtable discussion during which time SDT members identified various problem statements or issues for the team to consider including in the SAR. The issue statements were then grouped into “buckets” as follows:

GROUP 1: Existing cross-over terms with differences in substance and/or content. For these terms, SDT to identify differences in definition narratives, and to the extent appropriate, revise the term(s) to align.

GROUP 1A: Meaning is different

GROUP 1B: Narrative content is different, but meaning is not

GROUP 2: Existing cross-over terms with capitalization differences

1. For each cross-over term, identify where there are capitalization differences in the definition narrative. To the extent necessary, revise the narratives to be identical.
2. Ensure that all capitalized terms are defined in that particular source.
3. Identify and address words used in the narrative of the definition of a Glossary and/or ROP term that are capitalized but should not be because the term is not a defined term. For example, Point of Receipt uses “Generator,” but generator is not a defined term.

GROUP 3: Cross-over terms that are currently under revision, board-approved, or pending regulatory approval with differences in substance and/or content. For these terms, SDT to review pending (or proposed) revisions to defined term(s), identify differences in definition narratives, and to the extent appropriate, revise the term(s) to align.

GROUP 4: SDT to identify process improvement opportunities and provide recommendations to the SC and/or NERC.

1. **Single-use defined terms.** Consider whether single-use, standard-only definitions should be eliminated and incorporated into the continent-wide Glossary. Conduct similar assessment for the ROP sections that contain definitions limited to a particular section of the Rules. For example, Section 1501 contains five definitions that are not included in Appendix 2.

2. **Defined terms used in Reliability Standards that are not capitalized but should be.** Identify instances where a term is defined in the Glossary, but when used in the body of a standard, the term is not capitalized. Determine if usage of the word meets the definition provided in the Glossary, and whether capitalization of the term is in fact appropriate. For example, “load” is found in PRC-006-2 but it is not capitalized; determine whether the term should be capitalized or whether it is proper as is.
3. **Perform a “periodic review” of the Glossary, similar to that conducted for Reliability Standards.** This would include a: review of Version 0 terms (2007) adopted in FERC Order No. 693 to determine whether these terms should continue to exist in the Glossary as a defined term, or if the term should be retired or refined; review of whether each defined terms actually appears in a Reliability Standard; assess the definitions to determine if the narrative is accurate and appropriate given revisions and additions to other Glossary terms (superfluous, redundant, inconsistent, inadequate, ambiguous, or not used consistently throughout the standards); and, identify any terms used in Reliability Standards that are not defined terms but should be.
4. **Create a change log for the Glossary (version history).** Currently, changes are made to the Glossary but no change log or redline is provided. This makes it very difficult for industry to identify the specific changes that were made. NERC should maintain a “change log” identifying any revisions to the Glossary. Additionally, when a new version is released, NERC should make an announcement to notify the industry.
5. **Revision alignment process.** Currently, there is no process in place to ensure that cross-over terms under revision in one source are also revised/updated in another source. For example, the Risk-Based Registration project revised certain terms in the ROP, but did not make revisions to the respective Glossary terms. As a result, the cross-over terms in the ROP and Glossary are no longer aligned. A process is needed to ensure that going forward, when a cross-over term is under revision, changes are also made to the other source(s) defining that cross-over term, to the extent appropriate.

GROUP 5: Formatting, typographical errors, spacing issues, minor differences (“clean up” bucket). A number of cross-over terms contain narratives with very minor differences or formatting errors that should be addressed to align the two narratives. For example, a spacing issue in the ROP causes the term “Planning Authority” to be easily overlooked. Also, consider how to address when the beginning of a sentence happens to be a defined term (but possibly should not be capitalized because it is not intended to be the defined term).

Agenda Item 5 - Develop draft SAR

The SDT developed a draft SAR based upon the roundtable discussion and “buckets” of issues identified during the meeting. The completed SAR is posted on the Project 2015-04 webpage.

Agenda Items 7 and 8 - Develop project schedule and discuss next steps

The SAR will be presented to the Standards Committee at the March 11 meeting for approval and authorization to post for 30-day formal comment period. Assuming SC authorization, the SAR will be posted for comment Friday, March 13 through Monday, April 13. The SDT will have a one-hour

conference call on March 12, 12:00-1:00pm, EST to discuss the results of the March 11 SC meeting. The next in-person meeting is tentatively set for April 20-22 at Salt River Project in Tempe, AZ.

Agenda Item 9 - Action items

NERC staff distributed a draft SAR to the group for final review and refinements. All SDT members to provide feedback by COB on Monday, February 23.

All SDT members agreed to review the Glossary and ROP definitions to identify cross-over terms, review “buckets” that were identified by SDT and ensure no problem areas overlooked, and for each cross-over term, identify the appropriate bucket/grouping.

The meeting adjourned Friday, February 20, 2015 at 11:30am, CST.