Unofficial Comment Form

Project 2022-03 Energy Assurance with Energy-Constrained Resources | TOP-0XX-X

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2022-03 Energy Assurance with Energy-Constrained Resources | TOP-0XX-X** by **8 p.m. Eastern, Thursday, October 5, 2023.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2022-03EnergyAssurancewithEnergy-ConstrainedResources.aspx). If you have questions, contact Standards Developer, Dominique Love (via email), or at 404-217-7578.

## Background Information

This project will enhance reliability by requiring entities to perform energy reliability assessments to evaluate energy assurance and when predefined criteria are not met, develop Corrective Action Plan(s), Operating Plans, or other mitigating actions to address identified risks. Energy reliability assessments evaluate energy assurance across the operations and planning time horizons by analyzing the expected resource mix availability (flexibility) and the expected availability of fuel during the study period.

This project has two assigned Standard Authorization Requests (SARs) with the focus of this informal comment period based on the [Operations and Operations Planning Time Horizons SAR](https://www.nerc.com/pa/Stand/Project202203EnergyAssurancewithEnergyConstrainedR/Project%202022-03%20-%20Operations%20and%20Operations%20Planning%20Time%20Horizons%20SAR_Clean.pdf). The proposed Standard language outlines the process for the Near-Term Operational Planning Energy Reliability Assessment (OPERA). The Standard Drafting Team (SDT) intends on creating a Seasonal OPERA to be incorporated along with Near-Term OPERA at a later date.

The SDT is conducting an informal comment period to solicit feedback on proposed new definitions and new TOP-0XX Standard language below that addresses:

* New Definition for Energy Reliability Assessment (ERA)
* New Definition for Near-Term Operational Planning Energy Reliability Assessment (OPERA)
* New Definition for Study Period
* New Definition for Study Frequency
* New Definition for Study Temporal Resolution
* New TOP-0XX-X Standard

**Definitions:**

1. The Energy Reliability Assessment (ERA) definitions are intended to support the Near-Term OPERA which is discussed in this comment period and additional ERAs to be developed by this Standard Drafting Team (SDT). Are the definitions clear and understandable? If not, how would you suggest improving them?

[ ]  Yes

[ ]  No

Comments:

**TOP-0XX-X Standard – Energy Reliability Assessments**

**Requirement 1**

1. Energy Reliability Assessment Temporal Requirements (1): The SDT proposes several temporal parameters for the regular performance of Near-Term Operational Planning Energy Reliability Assessments (OPERA). The first is the requirement that the study begin within 48 hours following the completion of each assessment. The intent is that the first hour of the Near-Term OPERA would not be too far in the future, ensuring the starting point is based upon current information. Is using a starting point of no more than 48 hours in the future appropriate? If not, please comment with alternate language and explanation of recommended changes.

[ ]  Yes

[ ]  No

Comments:

1. Energy Reliability Assessment Temporal Requirements (2): The minimum Study Frequency (how often a Near-Term OPERA is performed) is set to monthly to ensure that results do not become outdated. The Study Frequency is also a function of study duration (how many days/hours the Near-Term OPERA looks at). The requirement for Study Frequency to be less than or equal to the study duration ensures that no period of time is uncovered by a Near-Term OPERA. Is the requirement to perform a Near-Term OPERA no less than monthly, appropriate, or should it be more or less frequent? If more or less frequent, please comment with alternate language.

[ ]  Appropriate

[ ]  More frequent

[ ]  Less frequent

Comments:

1. Energy Reliability Assessment: R1.1 and R1.2 are intended to add requirements that outline the elements that should be included in a Near-Term OPERA but allow Balancing Authorities (BA) with different concerns to have flexibility to implement the assessment such that the assessments are useful. Do you agree with the level of specificity in these requirements? If not, would you prefer that the requirements related to this are more or less specific? Additionally, please comment on what requirements should be removed, clarified, or changed.

[ ]  Appropriately specific

[ ]  Should be less specific

[ ]  Should be more specific

Comments:

**Requirement 2**

1. Near-Term OPERA Scenarios: The SDT is proposing to require the development and analysis of scenarios which have a reasonable risk of occurring through the time-horizon of the Near-Term OPERA. Table 1 includes standard scenarios that shall also be evaluated. These scenarios shall have documented criteria which specify when implementing a mitigation Operating Process solution is required. Do you agree with the language in the requirement? If not, please comment with alternate language and explanation of recommended changes.

[ ]  Yes

[ ]  No

Comments:

**Requirements 3/4/5**

1. Balancing Authority (BA) Requirements: The proposed Requirements 3, 4 and 5 are modeled after Requirements 2, 3 and 4 in EOP-011-2 to ensure that an individual BA’s Near-Term OPERA processes are reviewed by the Reliability Coordinator (RC) based on compatibility and inter-dependency with other BA’s Near-Term OPERA processes and scenarios, and have the BA address reliability risks identified by the RC. Do you agree that the requirements for the BA to have its processes reviewed by the RC and any RC-identified issues be addressed by the BA are reasonable?

[ ]  Yes

[ ]  No

Comments:

**Requirement 6**

1. Balancing Authority notifies the RC within 24 hours of identified forecasted Energy Emergencies: Once the Near-Term OPERA has been performed, per the RC reviewed Operating Process, R6 requires the BA to notify its RC within 24 hours of any identified forecasted Energy Emergencies. The 24 hours notification to the RC of all forecasted Energy Emergency provides time for the BA to prepare and respond to the forecasted Energy Emergency. Do you agree that the BA must notify the RC within 24 hours? If not, please comment what would be more appropriate and explain why.

[ ]  Yes

[ ]  No

Comments:

1. Submit the Near-Term OPERA results to the RC upon request: The requirement to submit the results to the RC upon request is intended to ensure the RC can review the assessment results. This requirement ensures the RC can review the results to verify the processes and scenarios are being implemented and to review any adverse results. Do you agree that the results must be submitted to the RC upon request, for RC review? If not, please comment which would be more accurate and explain why.

[ ]  Yes

[ ]  No

Comments:

**Requirement 7**

1. Operating Process Development: The proposed Requirements 7, 8 and 9 are modeled after Requirements 2, 3 and 4 in EOP-011-2 to ensure that there is a plan developed to respond to deficiencies noted during the performance of a Near-Term OPERA. R7 is intended that Operating Processes would be developed before OPERAs are performed and would be a high-level plan of how a BA would approach a forecasted Energy Emergency, not necessarily a step-by-step process.  R7 has required actions listed for consideration that are intended to reduce the risk of Energy Emergencies. As written, the requirement provides a list of optional steps to consider as part of an Operating Process. Should the list of requirements for Operating Processes be optional (as written), be required to be addressed for all BAs (as in EOP-011), or removed from R7 entirely? Please provide additional actions or notes which should not be included in this list as comments.

[ ]  The listed actions should be addressed by all BAs (as in EOP-011)

[ ]  The listed actions should be options (as written)

[ ]  The listed actions should not be part of the Standard

Comments:

1. Operating Process Development: The requirement is intended to ensure that there is a plan developed to respond to deficiencies noted during the performance of a Near-Term OPERA. While there are multiple possible types of plans that could be developed (e.g., Operating Plan, Operating Process, Operating Procedure, Corrective Action Plan), the most relevant defined term for responding to a forecasted Energy Emergency is Operating Process. Do you agree with the correct type of plan being an Operating Process? If not, please comment which would be more accurate and explain why.

[ ]  Yes

[ ]  No

Comments:

**Requirements 8/9/10**

1. Address Risks Identified in the Review: R8 is intended to provide RCs with information that is needed to ensure that the plans address the reliability of the system. R9 is needed to ensure that any risk identified by the RC in R7 is mitigated by the BA. The SDT proposes that the BA addresses the risk in its Operating Plan and resubmits it to its RC. R10 requires the BA to revise the Operating Process that was previously reviewed by the RC and found to require modifications. Do you agree with the language in the requirements including the proposed timeframes? If not, please provide updated language in your comment as well as a basis for the recommendation.

[ ]  Yes

[ ]  No

Comments:

**Requirements 11/12**

1. Implementation of Operating Process: R11 is a follow-up from R7, where the BA is now implementing the Operating Process that was previously developed. R12 requires the RC to ensure quick dissemination of critical information to a list of entities which can take appropriate actions to respond to the forecasted Energy Emergency. Does the proposed language clearly outline the responsibilities of the BA and RC in the event of a forecasted Energy Emergency? Is the 24-hour notification window feasible and appropriate for the types of emergency situations that might arise? Please provide any other comments about the language in Requirements 11 and 12.

[ ]  Yes

[ ]  No

Comments:

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

Comments: