

**Compliance Questionnaire and**

**Reliability Standard Audit Worksheet**

**TOP-002-2.1b — Normal Operations Planning**

**Registered Entity:** *(Must be completed by the Compliance Enforcement Authority)*

**NCR Number:** *(Must be completed by the Compliance Enforcement Authority)*

**Applicable Function(s): BA, TOP, GOP, LSE, TSP**

**Auditors:**

**Disclaimer**

NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

# Subject Matter Experts

Identify your company’s subject matter expert(s) responsible for this Reliability Standard. Include the person's title, organization and the requirement(s) for which they are responsible. Include additional sheets if necessary.

**Response: *(Registered Entity Response Required)***

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# Reliability Standard Language

**TOP-002-2.1b — Normal Operations Planning**

**Purpose:**

Current operations plans and procedures are essential to being prepared for reliable operations, including response for unplanned events.

**Applicability:**

Balancing Authority

Transmission Operator

Generator Operator

Load Serving Entity

Transmission Service Provider

**NERC BOT Approval Date: 11/1/2006**

**FERC Approval Date: 3/16/2007**

**Reliability Standard Enforcement Date in the United States: 6/18/2007**

**Requirements**:

**R1.** Each Balancing Authority and Transmission Operator shall maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each Balancing Authority and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R1 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R1.**

\_\_\_Determine if the entity maintained a set of current plans designed to evaluate options and set procedures for reliable operation through a reasonable future time period.

\_\_\_Determine if the entity used available personnel and system equipment to implement these plans to ensure the interconnected system reliability was maintained.

**Detailed notes:**

**R2.** Each Balancing Authority and Transmission Operator shall ensure its operating personnel participate in

the system planning and design study processes, so that these studies contain the operating personnel

perspective and system operating personnel are aware of the planning purpose.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R2 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R2.**

\_\_\_\_ Determine if the entity’s operating personnel participated in the system planning and design study process.

**Detailed notes:**

**R3.** Each Load Serving Entity and Generator Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal operations with its Host Balancing Authority and Transmission Service Provider. Each Balancing Authority and Transmission Service Provider shall coordinate its current-day, next-day, and seasonal operations with its Transmission Operator.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R3 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R3.**

\_\_\_Determine if the entity coordinated (where confidentiality agreements allow) its current‑day, next‑day, and seasonal operations with its Host‑Balancing Authority and Transmission Service Provider.

\_\_\_Determine if the entity coordinated its current‑day, next‑day, and seasonal operations with its Transmission Operator.

**Detailed notes:**

**R4.** Each Balancing Authority and Transmission Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R4 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**Compliance Assessment Approach Specific to TOP-002-2.1b R4.**

\_\_\_Determine if the entity coordinated (where confidentiality agreements allow) its current‑day, next‑day, and seasonal planning and operations with neighboring Balancing Authorities, Transmission Operators, and with its Reliability Coordinator.

**Detailed notes:**

**R5.** Each Balancing Authority and Transmission Operator shall plan to meet scheduled system

Configuration, generation dispatch, interchange scheduling and demand patterns.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R5 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R5.**

\_\_\_\_ Determine if the entity planned to meet scheduled system configuration, generation dispatch, interchange scheduling, and demand patterns.

**Detailed notes:**

**R6.** Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system

configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional, and local reliability requirements.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R6 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R6.**

\_\_\_\_ Determine if the entity planned to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization/Regional Entity, sub-regional, and local reliability requirements.

**Detailed notes:**

**R7.** Each Balancing Authority shall plan to meet capacity and energy reserve requirements, including the

deliverability/capability for any single Contingency.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R7 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R7.**

\_\_\_\_ Determine if the Balancing Authority planned to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency.

**Detailed notes:**

**R8.** Each Balancing Authority shall plan to meet voltage and/or reactive limits, including the deliverability/capability for any single contingency.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R8 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R8.**

\_\_\_\_ Determine if the Balancing Authority planned to meet voltage and/or reactive limits, including the deliverability/capability for any single contingency.

**Detailed notes:**

**R9.** Each Balancing Authority shall plan to meet Interchange Schedules and ramps.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R9 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R9.**

\_\_\_\_Determine if the Balancing Authority planned to meet Interchange Schedules and ramps.

**Detailed notes:**

**R10.** Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits

(SOLs) and Interconnection Reliability Operating Limits (IROLs).

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R10 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R10.**

\_\_\_\_ Determine if the entity planned to meet all SOLs and IROLs.

Note: See interpretation of R10 on page 30 of this RSAW.

**Detailed notes:**

**R11.** The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R11 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R11.**

\_\_\_ Determine if the Transmission Operator performed seasonal, next‑day, and current‑day Bulk Electric System studies to determine SOLs.

\_\_\_ Determine if the Transmission Operator utilized neighboring identical SOLs for common facilities.

\_\_\_ Determine if the Transmission Operator updated the Bulk Electric System studies as necessary to reflect current system conditions.

\_\_\_ Determine if the Transmission Operator made the results of the Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.

**Note to Auditor**

Under R11, a CEA is to verify that the TOP incorporated all outages – including outages of Protection Systems that affect the reliability performance of the transmission system – in its current-day, next-day, and seasonal operational planning studies to properly account for current system conditions

**Planned Outages in the Transmission Planning Horizon**

Although there are situations in which outages are planned and scheduled more than 12 months in advance, more often outages are placed on an approved TOP or BA outage schedule in the operating horizon, less than one year out from the planned outage. Most maintenance plans are developed, and therefore the associated outages are planned with less lead time. In cases where outages are scheduled less than one year out, the lead time makes it impractical for inclusion in planning studies under the TPL timeframe.

**Evaluation of Protection System Outages**

Protection Systems must operate and clear faults within the required clearing time to satisfy system performance requirements. All outages of Protection Systems or their components that affect the reliability performance of the transmission system must be evaluated for the periods they are scheduled, in the planning horizon in TPL assessments and in the operational planning timeframe through operating studies.

For example, if a transmission line has A and B protection packages that are not functionally equivalent and the outage of one protection package affects the operating speed of the Protection System, the impact of slower fault clearing on the power delivery capability of the Bulk Power System (BPS) must be considered in the assessments and studies. Such impacts also must be considered when a transmission line has a single protection package and one component of the package (e.g., the communication system) is taken out of service.

**Detailed notes:**

**R12.** The Transmission Service Provider shall include known SOLs or IROLs within its area and neighboring

areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total

Transfer Capability and Available Transfer Capability calculation processes.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R12 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R12.**

Determine if the Transmission Service Provider included known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.

**Detailed notes:**

**R13.** At the request of the Balancing Authority or Transmission Operator, a Generator Operator shall perform generating real and reactive capability verification that shall include, among other variables, weather, ambient air and water conditions, and fuel quality and quantity, and provide the results to the Balancing Authority or Transmission Operator operating personnel as requested.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Question:** Have you received a request from your Balancing Authority or Transmission Operator to perform real and reactive capability verification testing of any generation unit?

**Entity** **Response: *(Registered Entity Response Required)***

# R13 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R13.**

\_\_\_Determine if the Generator Operator, upon request of the Balancing Authority or Transmission Operator, performed generating and reactive capability verification that included:

\_\_\_Weather

\_\_\_Ambient air and water conditions

\_\_\_Fuel quality and quantity

**\_\_\_** Determine if the Generator Operator provided the results of the test to the Balancing

Authority or Transmission Operator operating personnel as requested.

**Detailed notes:**

**R14.** Generator Operators shall, without any intentional time delay, notify their Balancing Authority and Transmission Operator of changes in capabilities and characteristics including but not limited to:

**R14.1.** Changes in real output capabilities. (Effective August 1, 2007)

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R14 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R14.**

\_\_\_Determine if the Generator Operator notified its Balancing Authority and Transmission Operator, without intentional time delay, of changes in capabilities and characteristics including but not limited to:

\_\_\_Changes in real output capabilities.

Note: An intentional time delay should be considered potential evidence of an intent to violate this Requirement and that information will need to be passed on to enforcement.

**Detailed notes:**

**R15.** Generation Operators shall, at the request of the Balancing Authority or Transmission Operator, provide a forecast of expected real power output to assist in operations planning (e.g., a seven-day forecast of real output).

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R15 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R15.**

\_\_\_ Determine if the Generator Operator provided a forecast of expected real power output at the request of the Balancing Authority or Transmission Operator.

**Detailed notes:**

**R16.** Subject to standards of conduct and confidentiality agreements, Transmission Operators shall, without any intentional time delay, notify their Reliability Coordinator and Balancing Authority of changes in capabilities and characteristics including but not limited to:

**R16.1.** Changes in transmission facility status.

**R16.2.** Changes in transmission facility rating.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R16 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R16.**

\_\_\_Determine if the Transmission Operator notified, subject to standards of conduct and confidentiality agreements, and without any intentional time delay, its Reliability Coordinators and Balancing Authorities of changes in capabilities and characteristics including but not limited to:

\_\_\_Changes in transmission facility status

\_\_\_Changes in transmission facility rating

Note: An intentional time delay should be considered as potential evidence of intent to

violate this requirement and will need to be forwarded to enforcement .

**Detailed notes:**

**R17.** Balancing Authorities and Transmission Operators shall, without any intentional time delay, communicate the information described in the requirements R1 to R16 above to their Reliability Coordinator.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R17 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R17.**

\_\_\_Determine if the entity communicated the information described in Requirement 1 through Requirement16 in TOP‑002‑2 to its Reliability Coordinator without any intentional time delay.

Note: An intentional time delay should be considered as potential evidence of intent to

violate this requirement and will need to be forwarded to enforcement .

**Detailed notes:**

**R18.** Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R18 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R18.**

\_\_\_Determine if the entity used uniform line identifiers when referring to transmission facilities of an interconnected network.

**Detailed notes:**

**R19.** Each Balancing Authority and Transmission Operator shall maintain accurate computer models utilized for analyzing and planning system operations.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R19 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority.**

**Compliance Assessment Approach Specific to TOP-002-2.1b R19.**

\_\_\_Determine if the entity maintained accurate computer models utilized for analyzing and planning system operations.

**Detailed notes:**

# Supplemental Information

**Other –** The list of questions above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here**, as necessary that** demonstrates compliance with this Reliability Standard.

**Entity** **Response: *(Registered Entity Response)***

# Compliance Findings Summary (to be filled out by auditor)

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| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
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**Excerpts from FERC Orders -- For Reference Purposes Only**

**Updated Through April 15, 2013**

**TOP-002-2**

**Order No. 693**

P 1567. The eight Transmission Operations (TOP) Reliability Standards apply to transmission operators, generator operators and balancing authorities. The goal of these Reliability Standards is to ensure that the transmission system is operated within operating limits. Specifically, these Reliability Standards cover the responsibilities and decision-making authority for reliable operations, requirements for operations planning, planned outage coordination, real-time operations, provision of operating data, monitoring of system conditions, reporting of operating limit violations and actions to mitigate such violations. The Interconnection Reliability Operations and Coordination (IRO) group of Reliability Standards complement these proposed TOP Reliability Standards.

P 1590. Reliability Standard TOP-002-2 requires transmission operators and balancing authorities to look ahead to the next hour, day and season, and have operating plans ready to meet any unscheduled changes in system configuration and generation dispatch. The Reliability Standard addresses the following matters: (1) procedures to mitigate System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) violations; (2) verification of real and reactive reserve capabilities; (3) communications; (4) modeling; (5) information exchange and (6) data confidentiality restrictions. The goal of TOP-002-1 is to ensure that resources and operational plans are in place to enable system operators to maintain the Bulk-Power System in a reliable state.

P 1599. The Commission approves Reliability Standard TOP-002-2 as mandatory and enforceable…

P 1600. We are adopting our proposal regarding deletion of references to confidentiality agreements from the Requirements. As we explained in the NOPR, the effectiveness of a Reliability Standard should not be predicated upon the existence of a confidentiality agreement…

P 1601. … Identification and communication of control actions that can be implemented within 30 minutes are required to ensure that system operators are aware of and have options available to respond to system conditions following the first contingency to restore the system to a secure state so that it can withstand the next contingency. In addition, the control actions identified in the next-day analysis may quite often be relevant, and informing the system operators of the control options earlier on would be helpful. While the operators may take other actions to preserve the system, they need to have at least one plan (control actions) that will preserve the system from cascading… we note that this capability will help operators in assessing system responses, but they will not identify the control actions system operators will need to take in real-time. Further, operators may not be aware of available control actions, or worse they may not have any control actions, other than firm load-shedding, available to adjust the system after a first contingency occurs…

P 1602. … system operators must operate the system in front of them at all times to be capable of withstanding a critical contingency (N-1) without resulting in instability, uncontrolled separation or cascading failures. After this N-1 contingency the operators must adjust the system as soon as possible and in no longer than 30 minutes so that the system can then withstand a new N-1 contingency. Further discussion of how this applies in the planning arena is presented in connection with the TPL group of Reliability Standards.

P 1603. The Commission agrees… that the minimum voltages at nuclear plant auxiliary power system buses should be assessed in next-day analysis to ensure that adequate voltages can be maintained in accordance with the nuclear plant minimum voltage requirements. If this assessment projects that the minimum voltage requirements cannot be met, the transmission operators or balancing authorities must notify the nuclear power plan as soon as possible, but in no event later than the commencement of the next day’s real-time operations. If during real-time operations the transmission operator cannot maintain the minimum voltage, pre or post contingency, it must inform the nuclear plant operator accordingly so that the appropriate corrective actions can be carried out by both the nuclear plant operator and the transmission operator…

P 1606. …Commenters did not take issue with the proposed interpretation of the term “deliverability” as “the ability to deliver the output from generation resources to firm load without any reliability criteria violations for plausible generation dispatches.”The Commission adopts this proposed interpretation. In order to ensure the necessary clarity, the term as used in Requirement R7 of TOP-002-2 should be understood in this manner.

P1607. … Accordingly, the Commission approves Reliability Standard TOP-002-2…

**North American Electric Reliability Corporation, 129 FERC ¶ 61,191 (December 2, 2009)**

17. The petition does not propose to create any new requirements to the Reliability Standard, but clarifies that the existing requirement that a “unique” Bulk Electric System study need not be produced each day, that there is no particular constitution of a study, and that Requirement 11 mandates identification of existing and potential exceedances of operating limits in the determination of SOLs.

18. NERC answers Orlando’s first question stating that each day-ahead and current-day must have a study that applies to it. However, it is not necessary to generate a “unique” study each day. It is acceptable to use a previously-generated study for subsequent days if system conditions on those days are similar to those addressed in the study. We agree that it is not necessary to generate a “unique” study when a previously generated study would provide the same result. The interpretation correctly notes that a review still must be performed to determine system conditions and ensure that a specific study is not necessary based on those conditions. The Commission agrees with the interpretation. Study and review are performed in multiple stages, including data gathering, review of the data by transmission operators and, if necessary, review of simulations or other generation and power flow information. New data is gathered for each operating day, and if incoming data indicate that anticipated conditions are addressed in a prior analysis, then it is not necessary to perform additional studies or simulations.

19. NERC’s answer to Orlando’s second question clarifies that “the requirement does not mandate a particular type of review or study.” The Commission notes that this determination is consistent with Order No. 672, which generally states that Reliability Standards should define “what” needs to be accomplished rather than “how” it should be accomplished.[[1]](#footnote-1)

20. NERC’s answer to Orlando’s third question states that studies must determine both SOLs and potential violations of those SOLs. The Commission agrees with NERC that if the transmission operator’s review of current and anticipated system conditions indicates that prior studies and SOLs may be outdated, it must address changes in the system, and conduct an updated study to identify SOLs for new conditions.[[2]](#footnote-2)

21. The Commission denies California Cogeneration’s protest. California Cogeneration seeks changes to the requirements set forth in the TOP-002-2 Reliability Standard. The protest is a collateral attack on the Commission’s order accepting the TOP Reliability Standards.[[3]](#footnote-3) Likewise, California Cogeneration’s proposed remedy to revise the standard to not apply to generator lead lines is outside of the scope of the interpretation request. California Cogeneration’s request should have been raised as part of the NERC Reliability Standards development process. At this point, its request may be pursued through the NERC Reliability Standards development process.

**Appendix 2 of TOP-002-2.1b**

**Requirement Number and Text of Requirement:**

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

**Clarification needed:**

Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

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| Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool |
| The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team. |
| **Requirement Number and Text of Requirement** |
| **R10.**  Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). |
| **Question** |
| In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs? |
| **Response** |
| Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs. |

**North American Electric Reliability Corporation, 137 FERC ¶ 61,061 (October 20, 2011)**

On April 15, 2011, NERC submitted a petition for Commission approval of an interpretation of Standard TOP-002-2a Requirement R10. FERC approved the interpretation, referred to as Reliability Standard TOP-002-2b, effective as of the date of this order [October 20, 2011].

**North American Electric Reliability Corporation, 140 FERC ¶ 61,191 (September 13, 2012)**

On June 5, 2012, NERC submitted a filing that requested approval of errata changes to seven Reliability Standards including:

• TOP-002-2b Normal Operations Planning - remove incorrect language in Effective Date section of Exhibit B (“FERC Approved 12/2/09”); remove two retired sub-requirements (R.14.1 and R.14.2) and parenthetical reference thereto (“Effective August 1, 2007;”) and correct Measure M7 to reflect these changes. As a result of these changes, this standard will be numbered “TOP-002-2.1b” on a going-forward basis. NERC has also updated the version history table to reflect these revisions.

NERC’s uncontested filing is approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability, under 18 C.F.R. § 375.303, as of the date of this order [September 13, 2012].

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1.1 | December 16 2009 | Russ Mountjoy, Mike Wells, Jim Williams | Inserted interpretation issued 12/2/09 and updated Supplemental Information statement. |
| 1.1 | May 6 2010 | Craig Struck | Renamed to TOP-002-2a to indicate interpretation included. Minor formatting changes. |
| 1.1 | December 2010 | QRSAW WG | Revised Findings Table and modified Supporting Evidence tables. |
| 1.1 | January 2011 | Craig Struck | Reviewed for format consistency and content. |
| 1.2 | September 2011 | Craig Struck | Format changes for 2012. |
| 1.3 | February 2013 | Jacki Power | Added Interpretation for Requirement 10. Deleted retired sub-requirements of Requirement 14. Updated RSAW title. |
| 1.3 | April 15, 2013 | NERC Legal | Updated excerpts from FERC orders from March 31, 2009 through and including April 15, 2013. |
| 1.4 | March 20, 2014 | RSAW Task Force | Updated RSAW to include compliance guidance from CAN-0020. |

1. Order No. 672, FERC Stats. & Regs. ¶ 31,204 at P 260. [↑](#footnote-ref-1)
2. Additionally, the Commission notes that Requirement R10 of TOP-002-2 requires balancing authorities and transmission operators to plan to meet SOLs. [↑](#footnote-ref-2)
3. Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 1599-1608. [↑](#footnote-ref-3)