

ERO Enterprise CMEP Practice Guide

Determinations of Provision of Operating Plans from Transmission Operators and Balancing Authorities to Reliability Coordinators for TOP-002-4 R6 and R7
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Background

In support of successful implementation of and compliance with the North American Electric Reliability Corporation (NERC) Reliability Standards, the Electric Reliability Organization (ERO) Enterprise¹ adopted the Compliance Guidance Policy.² The Compliance Guidance Policy outlines the purpose, development, use, and maintenance of guidance for implementing Reliability Standards. According to the Compliance Guidance Policy, Compliance Guidance includes two types of guidance – Implementation Guidance and Compliance Monitoring and Enforcement Program (CMEP) Practice Guides.³

Purpose

CMEP Practice Guides are developed solely by the ERO Enterprise to reflect the independent, objective professional judgment of ERO Enterprise CMEP staff (CMEP staff), and, at times, may be initiated following policy discussions with industry stakeholders. Following development, they are posted for transparency on the NERC website. It is to be noted, especially to registered entities using this guide as a reference, that while some aspects of this guide may assist CMEP staff directly in determining compliance, some parts of the guide are to assist CMEP staff in understanding how an entity mitigates risk in order to inform risk-based compliance monitoring. This understanding of the controls to mitigate risk can affect monitoring activities, including requests for information and adjustments to an entity's compliance oversight plan.

The purpose of this CMEP Practice Guide is to address how CMEP staff will assess provision of Operating Plans from Transmission Operators and Balancing Authorities to Reliability Coordinators when determining compliance with TOP-002-4 R6 and R7.

Transmission Operator Operating Plans

While specific facts and circumstances ultimately shape compliance monitoring, CMEP staff will consider and apply the principles identified below.

¹ The ERO Enterprise consists of NERC and the Regional Entities.

² The ERO Enterprise Compliance Guidance Policy is located on the NERC website at: http://www.nerc.com/pa/comp/Resources/ResourcesDL/Compliance_Guidance_Policy_FINAL_Board_Accepted_Nov_5_2015.pdf.

³ Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities could comply with a Standard that are vetted by industry and endorsed by the ERO Enterprise. CMEP Practice Guides differ from Implementation Guidance in that they address how ERO Enterprise CMEP staff executes compliance monitoring and enforcement activities, rather than examples of how to implement the Standard.

If CMEP staff review of the Operational Planning Analysis performed in TOP-002-4 R1 affirms no SOL exceedances, then CMEP Staff do not need to assess whether the TOP developed an Operating Plan under R2 or submitted an Operating Plan to the RC under R6. However, CMEP Staff should review the TOP's next-day operating plans per R1 or other confirmation that no SOL exceedances were identified so, when determining compliance with R6, CMEP staff shall understand how the following is achieved:

- The Reliability Coordinator is aware that the work was performed and there was not a communications failure.
- The Reliability Coordinator can determine if a discrepancy exists between its own analysis and the Transmission Operator's plan.
- The documentation of the requirement provides a full record of the daily Operational Planning Analysis and the effort made by the entity to meet compliance.

When CMEP staff encounters situations where a TOP submits an Operating Plan for an identified period of time (such as the weekend, or until further notice) to the RC, CMEP staff shall seek to understand:

- Whether there is a daily assessment of possible changes that have occurred to the assumptions about operating conditions (e.g., outages, system topology/system configuration, weather and/or load, etc.) that result in the need to submit an updated Operating Plan; and
- Whether the TOP has documentation that the Reliability Coordinator has agreed to the interval or the entity is following the Reliability Coordinator's established practices that would require an updated Operating Plan.

Balancing Authority Operating Plans

While specific facts and circumstances ultimately shape compliance monitoring, CMEP staff will consider and apply the principles identified below.

When determining compliance with TOP-002-4 R7, CMEP staff shall seek to understand whether a Balancing Authority has submitted its Operating Plans for next-day operations to the RC. The CMEP staff, shall review either sampled specific plan documents, or whether all parts R4 (4.1 through 4.4) of TOP-002-4 are being provided to the Reliability Coordinator through alternate means (e.g., electronically, ICCP, etc.).

When CMEP staff encounters situations where an entity submits an Operating Plan for an identified period of time (such as the weekend, or until further notice) to the RC, CMEP staff shall seek to understand:

- Whether there is a daily assessment of possible changes that have occurred to the assumptions about daily operating conditions (e.g., weather, outages and/or load, etc.) that result in the need to submit an updated Operating Plan; and

- Whether the BA has documentation that the Reliability Coordinator has agreed to the interval or the entity is following the Reliability Coordinator’s established practices that would require an updated Operating Plan.