

Comment Report

Project Name: 2021-06 Modifications to IRO-010 and TOP-003 | Draft 1
Comment Period Start Date: 10/25/2022
Comment Period End Date: 12/15/2022
Associated Ballots: 2021-06 Modifications to IRO-010 and TOP-003 Implementation Plan IN 1 OT
2021-06 Modifications to IRO-010 and TOP-003 IRO-010-5 IN 1 ST
2021-06 Modifications to IRO-010 and TOP-003 TOP-003-6 IN 1 ST

There were 65 sets of responses, including comments from approximately 176 different people from approximately 117 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. To address third party participation in data exchanges, the SDT added a provision in both IRO-010-5 and TOP-003-6 that recognizes that an applicable entity that is required to respond to the data specification may identify data and information that will be provided by a third-party intermediary. However, this provision does not shift the responsibility to respond to the data request from the applicable entity to the intermediary. Rather, the provision recognizes that an applicable entity may utilize an intermediary to pass through data and information unaltered from the entities that originated the data and information. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.
2. To mitigate potential zero defect assumptions and decrease administrative burdens, the SDT revised the data specification requirements in both IRO-010-5 and TOP-003-6 to include more specificity to the protocols for providing data and information that includes: specific deadlines or periodicity in which data and information is to be provided, performance criteria for availability and accuracy of data, and provisions to allow a respondent entity to update or correct data and information as necessary. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.
3. To improve administration of data and information for the applicable entities, the SDT modified IRO-010-5 and TOP-003-6 to require the data specification to specify mutually agreed upon format, conflict resolution process, and security protocols or methods for securely transferring data or information. Do you agree with these modifications? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.
4. IRO-010-5 and TOP-003-6 require general data specifications to allow the Reliability Coordinator, Transmission Operator, and Balancing Authority to perform its Operational Planning Analysis, Real Time Assessment, Real-time monitoring (undefined term), and BA analysis functions (undefined term). The SDT focused on data and information generally rather than prescriptive requirements. Do you believe that all data and information needed by the RC, TOP, and BA to perform these reliability tasks (for example, PMU streaming, outage coordination, distribution, generator fuel information, etc.) is available pursuant to the proposed standards or is additional clarification needed that is more prescriptive.
5. To support the proposed modifications, the SDT revised the VSLs in both IRO-010-5 and TOP-003-6 to account for the clarified data specification criteria. Do you agree? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.
6. The SDT reviewed the other standards listed in the SAR's Detailed Description to determine whether additional changes could be proposed to the standards to address potential redundancy of requirements related to the four reliability tasks identified in IRO-010-5 and TOP-003-6 or create efficiencies reflective of the principle established by the Standards Efficiency Review initiative. Due to the criticality of the tasks and functions identified in these collateral standards, the SDT determined there is insufficient justifications for the retirement of these requirements and, therefore, the SDT is not proposing changes to these standards. Do you agree with this assessment? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.
7. The SDT is proposing an 18-month implementation plan. Would this proposed timeframe give enough time to implement the proposed modifications in IRO-010-5 and TOP-003-6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

8. Provide additional comments regarding IRO-010-5 for the SDT to consider.

9. Provide additional comments regarding TOP-003-6 for the SDT to consider.

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Santee Cooper	Chris Wagner	1		Santee Cooper	Christine Pope	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Portland General Electric Co.	Daniel Mason	6		Portland General Electric Co.	Brooke Jockin	Portland General Electric Co.	1	WECC
					Adam Menendez	Portland General Electric Co.	3	WECC
					Ryan Olson	Portland General Electric Co.	5	WECC
					Daniel Mason	Portland General Electric Co.	6	WECC
Public Utility District No. 1 of Chelan County	Diane E Landry	1		CHPD	Meaghan Connell	Public Utility District No. 1 of Chelan County	5	WECC
					Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC

					Glen Pruitt	Public Utility District No. 1 of Chelan County	6	WECC
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Amber Skillern	East Kentucky Power Cooperative	1	SERC
					Ryan Strom	Buckeye Power, Inc.	5	RF
					David Hartman	Arizona G&T Cooperatives	1	WECC
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC

DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Patricia Ireland	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
ISO New England, Inc.	Kathleen Goodman	2	NA - Not Applicable,NPCC	Standards Review Committee (SRC)	Helen Lainis	IESO	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Mike Del Viscio	PJM	2	RF
					Charles Yeung	SPP	2	MRO
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc.	2	MRO
					LaTroy Brumfield	American Transmission Company, LLC	1	MRO
					Bryan Sherrow	Kansas City Board Of Public Utilities	1	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO

					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					David Heins	Omaha Public Power District	1,3,5,6	MRO
					George Brown	Acciona Energy North America	5	MRO
					Jaimin Patel	Saskatchewan Power Corporation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern	5	SERC

						Company Generation		
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
NPCC	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Sheraz Majid	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					John Hastings	National Grid	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Dan Kopin	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Nicolas Turcotte	Hydro-Quebec TransEnergie	1	NPCC
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC

					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
Dominion - Dominion	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion	3	NA - Not Applicable

Resources, Inc.						Resources, Inc.		
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC

					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. To address third party participation in data exchanges, the SDT added a provision in both IRO-010-5 and TOP-003-6 that recognizes that an applicable entity that is required to respond to the data specification may identify data and information that will be provided by a third-party intermediary. However, this provision does not shift the responsibility to respond to the data request from the applicable entity to the intermediary. Rather, the provision recognizes that an applicable entity may utilize an intermediary to pass through data and information unaltered from the entities that originated the data and information. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy is concerned over the requirement that an intermediate entity have performance responsibility for the accuracy of data from a third party as defined by the end user of the data. An entity does not have the ability to validate the accuracy or correct data it does not originate.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer No

Document Name

Comment

The MRO NSRF does not believe the additional language of “identification of an intermediary to pass through data and information unaltered from the entities.” Is related to the reliability tasks of: Operational Planning Analysis, Real-time Assessments, Real-time monitoring & Balancing Authority analysis functions. As stated in the ‘Detailed Description’ section of the Standards Authorization Request (SAR), “the Standard Drafting Team should not revise requirements that are not directly related to the four reliability tasks identified above.” The MRO NSRF does not believe that ‘identification of intermediaries’ is within the scope of the SAR.

In addition, the MRO NSRF does not see the value of the language:

{C}· Intermediary may not be a NERC Registered Entity, there is no reliability value in identifying whom this intermediary is from an administrative standpoint.

{C}o {C}Further, the intermediary would already be known to the RCs, TOPs & BAs, as the data received would be coming from this intermediary.

{C}· The data should always remain ‘unaltered’ if a responsible entity, whether NERC Registered Entity, is to meet compliance will the IRO-010-5 & TOP-003-6 data specification.

{C}· If an Intermediary is to be used, the contractual terms & conditions with the NERC Registered Entity, would ultimately specify who, what, where, when & how.

{C}· Identifying the intermediary could lead to miscommunications and reliability gaps if there ever was a problem with the data. The RCs, TOPs & BAs could contact the intermediary rather than the responsible entity to resolve/question data integrity issues.

Likes 2	Lincoln Electric System, 1, Johnson Josh; Fuhrman Andy On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1;
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Dislikes 0	
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Response

LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF

Answer	No
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Document Name	
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Comment

ATC does not see the value in identifying an intermediary. The standard as currently written is silent on the topic of intermediaries and, therefore, does not prohibit or require the use of intermediaries. It is ultimately the responsibility of the NERC registered requestor and the entity that the requestor identified in R1.1 as having the necessary method to provide the data. The data path should not be considered. Having this requirement adds administrative burden to the standard, which is contrary to the objective of the revisions.

Likes 0	
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Dislikes 0	
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Response	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	
<p>AEP is appreciative of the efforts of the Standards Drafting Team, and supports their overall efforts and proposed standard revisions. We believe that a majority of what they have proposed will indeed be beneficial and will improve the future state of these standards. We would however like to share one concern which has impacted our balloting. There will be instances where the Transmission Operator needs data from the Reliability Coordinator (including but not limited to unit commitment data, load information, generation and load forecasts, etc.), however the RC is not included as an Applicable Entity in TOP-003, nor is it specifically obligated under TOP-003 R5. AEP recommends that the RC be added as a Applicable Entity for TOP-003 and also included in the obligations of R5. Our decision to vote negatively on the proposed revision of TOP-003 is solely driven by this concern.</p>	
Likes	0
Dislikes	0
Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	No
Document Name	
Comment	
<p>Minnesota Power agrees with EEI's comments.</p>	
Likes	0
Dislikes	0
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
<p>WEC Energy Group supports EEI's comments.</p>	
Likes	0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer

No

Document Name

Comment

AZPS agrees with the intent of the updated provisions but agrees with EEI that this does not meet the scope identified by the SER Phase 2 project. We support EEI's comments that there is insufficient reason to open these two standards based on the modification proposed.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

BPA believes this is an additional administrative burden that does not increase reliability.

Likes 0

Dislikes 0

Response

Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

No

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the comments as submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Exelon supports comments submitted by EEI.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer	No
Document Name	
Comment	
Portland General Electric Company supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
James Baldwin - Lower Colorado River Authority - 1	
Answer	No
Document Name	
Comment	
LCRA TSC does not see the need to identify an intermediary. The current version of the standard does not prohibit or require the use of intermediaries. We believe it is ultimately the responsibility of the NERC registered requestor and the entity that the requestor identified in R1.1 as having the necessary method to provide the data. The data path should not be considered. Having this requirement adds administrative burden to the standard, which is contrary to the objective of the revisions.	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
While the text proposed for R1.4 can simplify data handling for some entities, we agree with ATC comments that the current standard is silent – neither permitting nor prohibiting such transfers. Therefore, the added requirement – which is fundamentally administrative – is not necessary and potentially confusing.	
Also, the question and the technical rationale for R1.4 - though not normative – affirms that the compliance obligation remains with the originating entity even if an intermediary is used. We point out that the text of R1 does not currently explicitly require data and information needed by the RC to be communicated to the RC: that is, the recipient is not required to be specified in R1 for different information. When the specification published by the RC requires the transmission of information to an entity other than the RC, we believe the respondent (originating entity) meets its compliance obligation when it transfers the required information to the specified entity per the specification. The respondent is not responsible for the further transfer or processing of the information. It is possible, for example, for the specification to require the transfer of modelling information to a planning entity that then transfers it, after processing, to the RC. Other use cases are imaginable. Therefore, the rationale’s text that indicates compliance obligations stay	

with the respondent (paragraph 3 of Technical Rationale for R1.4) applies only in the case where a respondent asks to use an intermediary, not when an RC requires the use of an intermediary. All this is already manageable within the existing requirement.

If R1.4 (or revision thereof) were to stay in, we think the rationale should distinguish between the two types of intermediaries. If an entity asks to use an intermediary, it is responsible for the eventual reception by the RC of the information; if the RC orders the use of an intermediary, it is responsible for collecting the data from the intermediary.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

No

Document Name

Comment

MPC supports comments submitted by the MRO NERC Standards Review Forum.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer

No

Document Name

Comment

Santee Cooper believes that this will create additional administrative burdens and that it does not increase reliability. We also believe that 'identification of intermediaries' is NOT within the scope of the SAR and the current language appears to place the burden on the intermediary if the end-user specifies so in their protocol. Any protocols regarding accuracy and data correction should not place any responsibility on the intermediary who is only an information conduit.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

No

Document Name**Comment**

The MRO NSRF does not believe the additional language of “identification of an intermediary to pass through data and information unaltered from the entities” is needed to achieve the underlying purposes of the SAR: to mitigate zero defect expectations or reduce administrative burdens.

The MRO NSRF does not see the value of the language:

- Intermediary may not be a NERC Registered Entity, there is no reliability value in identifying whom this intermediary is from an administrative standpoint.

- o Further, the intermediary would already be known to the RCs, TOPs & BAs, as the data received would be coming from this intermediary.

- The data should always remain ‘unaltered’ if a responsible entity, whether NERC Registered Entity, is to meet compliance with the IRO-010-5 & TOP-003-6 data specification.

- If an Intermediary is to be used, the contractual terms & conditions with the NERC Registered Entity, would ultimately specify who, what, where, when & how.

- Identifying the intermediary could lead to miscommunications and reliability gaps if there ever was a problem with the data. The RCs, TOPs & BAs could contact the intermediary rather than the responsible entity to resolve/question data integrity issues.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Québec TransEnergie - 1

Answer

No

Document Name**Comment**

The standard as currently written is silent on the topic of intermediaries– neither permitting nor prohibiting such transfers and, therefore, does not prohibit or require the use of intermediaries. It is ultimately the responsibility of the NERC registered requestor and the entity that the requestor identified in R1.1 as having the necessary method to provide the data.

If the intent behind “identification of the applicable entities” in R1.1 includes applicable entities that are not identified in the Applicability section of the standard, a clarification in the Technical Rationale and in the standard would be beneficial. For example, “identification of applicable entities in Section 4 or other not referred to in Section 4 responsible for responding to the specification ...”. For example, when the specification published by the RC requires the transmission of information to an entity other than the RC, we believe the respondent (originating entity) meets its compliance obligation when it transfers the required information to the specified entity per the specification. The respondent is not responsible for the further transfer or processing of the information. It is possible that modelling information be transferred to a planning entity that then transfers it, after processing, to the RC. Other use cases are imaginable. Therefore, the rationale’s text that indicates compliance obligations stay with the respondent (paragraph 3 of Technical Rationale for R1.4) applies only in the case where a respondent asks to use an intermediary, not when an RC requires the use of an intermediary. All this is already manageable within the existing requirement.

If R1.4 were to stay we think the rationale should distinguish between the two types of intermediaries. If an entity asks to use an intermediary, it is responsible for the eventual reception by the RC of the information; if the RC orders the use of an intermediary, it is responsible for collecting the data from the intermediary.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

No

Document Name

Comment

While EEI would not be opposed to adding language in IRO-010-5 and TOP-003-6 to specifically address the use of third-party intermediaries, however, this issue is not a reliability gap and is not a sufficient reason to open these two Reliability Standards. The primary purpose of this project was to address issues identified under the SER Phase 2 project which identified evidence and data retention as the number one concern identified by entities that needed to be addressed. Our review of the changes indicates this was not addressed and there is insufficient reason to open these two standards and make the modifications proposed.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer

No

Document Name

Comment

LCRA TSC does not see the need to identify an intermediary. The current version of the standard does not prohibit or require the use of intermediaries. We believe it is ultimately the responsibility of the NERC registered requestor and the entity that the requestor identified in R1.1 as having the necessary method to provide the data. The data path should not be considered. Having this requirement adds administrative burden to the standard, which is contrary to the objective of the revisions.

Likes	0
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Dislikes	0
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Response

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer	No
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Document Name	
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Comment

The ISO/RTO Council Standards Review Committee (SRC) does not see a reliability need to have this provision (IRO-010, Part 1.4 and TOP-003, R1.4) in the standard. As entities are successfully able to utilize an intermediary today, we do not see the value in adding this commercial (contractual) provision to a mandatory reliability standard. Further, as this project was initiated pursuant to the Standards Efficiency Review (SER), the goal of this effort is to simplify (versus complicate) administrative burdens.

Likes	0
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Dislikes	0
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Response

Russell Noble - Cowlitz County PUD - 3

Answer	No
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Document Name	
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Comment

Cowlitz PUD fails to see any reliability objective being addressed by this additional requirement. Please note originating entities not party to the RC/TOP/BA specifications are likely not registered with NERC as this data can originate from non-BES systems. This would add unnecessary administrative burdens contrary to the SAR objective.

Likes	0
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Dislikes	0
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Response

Ayslynn Mcavoy - Arkansas Electric Cooperative Corporation - 3**Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Nazra Gladu - Manitoba Hydro - 1****Answer** Yes**Document Name****Comment**

No comment.

Likes 0

Dislikes 0

Response**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF****Answer** Yes**Document Name****Comment**

None.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF supports the added provision in IRO-010-5 and TOP-003-6 to allow a third-party intermediary to provide data and information of the behalf of the responsible respondent/applicable entity.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Yes

Document Name

Comment

AES Clean Energy agrees with these added provisions.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer

Yes

Document Name

Comment

In addition, the same rules should apply to the intermediary as they too have certain control of the data and information.

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name

Comment

Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (SIGE) has responded "yes" to question 1; however, SIGE would like the Standard Drafting Team to define and provide examples for the term "intermediary" in IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

We recommend the drafting team consider removing, or provide some clarifying statements for, "unaltered" in R1, Part 1.4 (both standards). Our assumption is that the intent here is to state that the integrity of the data remains true from the originator to the RC. As long as the integrity is intact, can it be reformatted as it is passed through? If the data is provided in one unit of measurement, can a different unit of measurement be calculated by the intermediary as part of the mutually agreed upon format?

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE

Answer

Yes

Document Name

Comment

PNMR agrees.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Yes

Document Name

Comment

IID currently does not have a third-party intermediary providing information. If in the future IID has a third-party intermediary providing information, IID understands they will be responsible to respond to the data request from the applicable entity.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Yes

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
<p>We are not opposed to adding language in IRO-010-5 and TOP-003-6 to address the use of third-party intermediaries, however, this issue is not reflective of the primary purpose of this project which was to address issues identified under the SER Phase 2 project which identified evidence and data retention as the number one concern identified by entities that needed to be addressed. This does not appear to have been addressed.</p>	

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Document Name

Comment

We support NPCC's comments:

We are not opposed to adding language in IRO-010-5 and TOP-003-6 to address the use of third-party intermediaries, however, this issue is not reflective of the primary purpose of this project which was to address issues identified under the SER Phase 2 project which identified evidence and data retention as the number one concern identified by entities that needed to be addressed. This does not appear to have been addressed.

Likes 0

Dislikes 0

Response

Sheraz Majid - Hydro One Networks, Inc. - 1

Answer

Document Name

Comment

Need more clarity on who are/could be intermediaries either in the standard or the technical rationale. Are these telecom provides (service and/or physical), RCs to TO/TOPs, TO/TOPs to RCs such as GO via RC (intermediary) to TO or GOs via TO (intermediary) to RCs etc.). Also, need to explanation on what is it trying to address.

+support comments submitted by NPCC RSC.

Likes 0

Dislikes 0

Response

2. To mitigate potential zero defect assumptions and decrease administrative burdens, the SDT revised the data specification requirements in both IRO-010-5 and TOP-003-6 to include more specificity to the protocols for providing data and information that includes: specific deadlines or periodicity in which data and information is to be provided, performance criteria for availability and accuracy of data, and provisions to allow a respondent entity to update or correct data and information as necessary. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

Again, the proposed changes add complexity and administrative burden. Cowlitz PUD supports comments by others in this regard and will review SDT responses to these commentors.

Likes 0

Dislikes 0

Response

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer No

Document Name

Comment

Although the SRC agrees with the SDT's intent to mitigate the potential for zero defect performance, we don't believe the proposed language addresses that concern. The SRC proposes that emphasis be placed on the dispute resolution process, whereby if the entity is not receiving the data necessary to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments, could tailor its approach according to the resultant risk the loss of information poses to reliably operating the BES.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State agrees with EEI comments.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer

No

Document Name

Comment

LCRA TSC believes these changes produce additional administrative burden without reducing potential zero-defect situations. Further defining the requirements around data sharing seems to increase risk of violation rather than decrease it. In addition, it isn't clear that defining accurate performance criteria for ICCP data would even be possible and tracking the availability and accuracy of that data would be burdensome.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #2.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

No

Document Name

Comment

EEL does not agree the problems entities have encountered with IRO-010-5 and TOP-003-6 are specific to data specifications received or the protocols for providing data and information. Instead, the concerns included the excessive costs associated with 1) storage of this data that outweighed the know risks, and 2) costs of managing, compiling and backing up data for the sole purpose of compliance monitoring and enforcement activities. Unfortunately, none of these concerns have been addressed in this first draft. Therefore, EEL does not support the proposed changes.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

No

Document Name

Comment

The MRO NSRF believes the additional language is useful to eliminate 'zero defect' assumptions. Notwithstanding, the MRO NSRF has concerns with the addition of the performance criteria of 'availability' without appropriate bounding language or allowances for unavailability (equipment/component failure, maintenance, et cetera). A data requestor may request 100% availability, which would then create a 'zero defect' requirement. The MRO NSRF suggests the following language:

IRO-010 & TOP-003 1.5.2, TOP-003 2.5.2 Performance criteria for the availability and accuracy of data and information, as applicable;

IRO-010 & TOP-003 1.5.2.1, TOP-003 2.5.2.1 Performance criteria for the availability shall be a magnitude of less than 100%, as applicable,

New Requirement:

IRO-010 R4, TOP-003 R6. Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider, when the data and information is unavailable, as identified in Requirement R1, shall consult with the effected applicable entities to determine a mutually agreeable action, if any, as it relates to the unavailable data and information.

Finally, the NSRF recommends coordination between the drafting team and the CIP-12 team that is dealing with similar issues for data exchanged between control centers.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer

No

Document Name

Comment

Santee Cooper has concerns with the addition of the performance criteria of 'availability' without appropriate bounding language or allowances for unavailability (equipment/component failure, maintenance, et cetera). The development and validation of metrics pertaining to deadlines and performance criteria are amplified with this change in language. A data requestor may request 100% availability, which would then create a 'zero defect' requirement.

IRO-002-7 R2 and TOP-001-5 R20 and R22 already require RCs, TOPs and BAs, respectively, entities to have redundantly and diversely routed data exchange infrastructure which addresses the issues with data availability without additional language in the standard. There are requirements in place with IRO-018-1(i) R1 TOP-010-1(i) R1 and R2 to address the quality of the Real-time data used in Real-time Analysis and Real-time monitoring. The changes may create redundancy with data quality and accuracy of Real-time monitoring and analysis capability requirements in TOP-010(i).

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

No

Document Name

Comment

MPC supports comments submitted by the MRO NERC Standards Review Forum.

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer

No

Document Name

Comment

LCRA TSC believes these changes produce additional administrative burden without reducing potential zero-defect situations. Further defining the requirements around data sharing seems to increase risk of violation rather than decrease it. In addition, it isn't clear that defining accurate performance criteria for ICCP data would even be possible and tracking the availability and accuracy of that data would be burdensome.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer No

Document Name

Comment

Portland General Electric Company supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer No

Document Name

Comment

We believe the current standard language is adequate to provide for the timely transfer of data and information. Any issue with the transfer timeliness or quality of data and information is corrected on an event basis. While it is preferable there never be issues with data transfer or quality, we understand there are instances where there are issues, but those issues are currently being mitigated without the need for additional standard language.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Exelon supports comments submitted by EEI.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC**Answer** No**Document Name****Comment**

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1****Answer** No**Document Name****Comment**

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response**Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE****Answer** No**Document Name****Comment**

CEHE supports the comments as submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC****Answer** No

Document Name

Comment

BPA believes these changes produce additional administrative burden without reducing potential zero defect situations. Further defining the requirements around data sharing seems to increase risk of violation rather than decrease it. For example, now we run the risk of violation for failing to provide a piece of data *and for providing it late*. In addition, it isn't clear that defining accuracy performance criteria for ICCP data would even be possible.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer

No

Document Name

Comment

AZPS does not agree with these provisions and supports EEIs comments that they do not address the concerns with the excessive costs associated with 1) storage of this data that outweighed the know risks, and 2) costs of managing, compiling and backing up data for the sole purpose of compliance monitoring and enforcement activities.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group supports EEI's comments.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer	No
Document Name	
Comment	
Minnesota Power agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
The development and validation of metrics pertaining to deadlines and performance criteria are amplified with this change in language. Current practices are more than adequate when issues are identified and are currently resolved in an efficient and effective manner. Duke Energy seeks additional known defect assumptions that would require a modification to existing Requirements. IRO-002-7 R2 and TOP-001-5 R20 and R22 already require RCs, TOP's and BA's entities, respectively, to have a redundant and diverse routed data exchange infrastructure which addresses the issues with data availability without additional language in the standard. Duke Energy also disagree with the inclusion of the consideration of the "accuracy of data and information." There are requirements in place with IRO-018-1(i) R1 TOP-010-1(i) R1 and R2 to address the quality of the Real-time data used in Real-time Analysis and Real-time monitoring.	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF	
Answer	No
Document Name	
Comment	
By adding more specific requirements, the standard would now force a zero-defect footing and then build from that, which means the requestor will need to track if the respondent is meeting the requirements with zero defects unless they are corrected under R1.5.3. This would add more administrative burden to the requestor.	
Likes 0	
Dislikes 0	

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer No

Document Name

Comment

The MRO NSRF believes the additional language is useful to eliminate 'zero defect' assumptions. Notwithstanding, the MRO NSRF has concerns with the addition of the performance criteria of 'availability' without appropriate bounding language or allowances for unavailability (equipment/component failure, maintenance, et cetera). A data requestor may request 100% availability, which would then create a 'zero defect' requirement. The MRO NSRF suggests the following language:

IRO-010 & TOP-003 1.5.2, TOP-003 2.5.2 Performance criteria for the availability and accuracy of data and information, as applicable;

IRO-010 & TOP-003 1.5.2.1, TOP-003 2.5.2.1 Performance criteria for the availability shall be a magnitude of less than 100%, as applicable,

New Requirement:

IRO-010 R4, TOP-003 R6. Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider, when the data and information is unavailable, as identified in Requirement R1, shall consult with the effected applicable entities to determine a mutually agreeable action, if any, as it relates to the unavailable data and information.

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

As noted in the answer to Q1, the current language appears to place the burden on the intermediary if the end-user specifies so in their protocol. Any protocols regarding accuracy and data correction should not place any responsibility on the intermediary who is only an information conduit.

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer No

Document Name

Comment

Agree only with the statement "...and provisions to allow a respondent entity to update or correct data and information as necessary." Adding more specificity regarding deadlines or periodicity, and performance criteria for availability and accuracy of data, may actually impose more restrictions stipulated in the standard (essentially adding to the zero-defect assumptions), and removes the ability for entities to determine those nuances between themselves to best fit their interactions.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Ayslynn Mcavoy - Arkansas Electric Cooperative Corporation - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6**Answer** Yes**Document Name****Comment**

IID agrees with the standard language change, as long as all entities agree regarding specifications.

Likes 0

Dislikes 0

Response**Carl Pineault - Hydro-Qu?bec Production - 5****Answer** Yes**Document Name****Comment**

We support the addition of 1.5.2 as meeting one of the objectives of the current project. However, suggestions by other commenters to promote it to 1.6 in the numbering seem warranted. Also, we support Manitoba Hydro's comment and suggestion (1.5.2 moved to 1.6 and reworded as "1.6 "Identification of a mutually agreed upon format and mutually agreed upon performance criteria for the availability or accuracy of data and information"). Giving the entity no say puts the criteria entirely in the RC's hands with no oversight which could result in the same zero-default expectation that originated the current project. The possible concern that entities could use this mutual agreement provision to harm reliability is overblown. Were an RC and an entity to fundamentally disagree, there are regional forums for possible mediation and failing that, regulatory instances like reliability organizations that can settle such matters in a formal compliance oriented environment with reliability as the objective. The possibility of such oversight should be sufficient to forestall deadlocks over mutual agreement.

As to justifying the need for such mutual agreement, we consider that it insures a dialogue between the RC and the entities in its Area. For example, some information is available less reliably or not all from some older facilities. Such facilities – often integrated long ago with older grid integration requirements - still support reliable grid operations through alternative operations management.

Likes 0

Dislikes 0

Response**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE****Answer** Yes**Document Name****Comment**

PNMR agrees.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name

Comment

SIGE believes that these changes create redundancy with data quality and accuracy of Real-time monitoring and analysis capability requirements in TOP-010(i). However, these revisions may add a benefit to data and information specifications that do not pertain only to real time requirements.

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

The existing standards do not appear convey a zero-defect assumption, and the existing evidence retention periods do not appear to be overly burdensome. Revising the standard to require RC/TOP/BAs to document minimum performance requirements within specifications could lead to minimum common denominator behavior from some recipients of the specifications, so RC/TOP/BAs will need to be careful to ensure the minimum performance requirements are acceptable.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Yes

Document Name

Comment

AES Clean Energy agrees with proposed changes and believes that more specificity to protocols for providing data and information will be extremely helpful.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF agrees with proposed changes to provide more specificity to protocols for providing data and information.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

While outside the scope of the current SAR, AEP would like to recommend that TOP-003 R1.3 and its subparts be deleted once the recent obligations associated with Project 2021-07 (Extreme Cold Weather) have become enforceable.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

Manitoba Hydro agrees with the standard drafting team that more specificity is required for performance. Manitoba Hydro suggests that 1.5.2 be moved and re-worded from "Performance criteria for the availability or accuracy of data and information, as applicable" to section 1.6 "Identification of a mutually agreed upon format and mutually agreed upon performance criteria for the availability or accuracy of data and information".

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Québec TransEnergie - 1

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Mike Magruder - Avista - Avista Corporation - 1

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Josh Combs - Black Hills Corporation - 3

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Sheila Suurmeier - Black Hills Corporation - 5

Answer	Yes
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Document Name	
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Comment	
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Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ken Habgood - Seminole Electric Cooperative, Inc. - 4	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE agrees with the including more specificity to the protocols for providing data and information. For IRO-010-5, Texas RE recommends that the mutually agreeable format as referenced in Requirement Part 1.6 include specifically that the mutually agreeable format is between the Reliability Coordinator and the entities that have data requirement by the RC's Operational Planning Analyses, Real-time monitoring and Real-time Assessments as noted in Requirement R2.

For TOP-003-6 Requirement Part 1.6, Texas RE Texas RE recommends that the mutually agreeable format as referenced in Requirement Parts 1.6 include specifically that the mutually agreeable format is between the Transmission Operator (TOP) and the entities that have data requirement by the TOP's Operational Planning Analyses, Real-time monitoring and Real-time Assessments as noted in Requirement R3.

For TOP-003-6 Requirement Part 2.6, include specifically that the mutually agreeable format is between the Balancing Authority (BA) and the entities that have data requirement by the BA's analysis functions and Real-time monitoring.

Likes 0

Dislikes 0

Response

3. To improve administration of data and information for the applicable entities, the SDT modified IRO-010-5 and TOP-003-6 to require the data specification to specify mutually agreed upon format, conflict resolution process, and security protocols or methods for securely transferring data or information. Do you agree with these modifications? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer No

Document Name

Comment

If a responding entity is not sure what the format is, they should be reaching out to the requesting party, and requesting party should clarify. Conflict resolutions, which at times this issue could fall under, should already be specified in the requesting party's data specs. If any questions regarding that, the requesting and responding parties should communicate. Resolution should be described as well in the data specs, and if it's not and the responding party has no issue, the Standard does not need to stipulate that. If the Standard stipulates these items, that might make it more prescriptive and potentially increase administrative burdens if the stipulation in the standard does not fit what works best for the requesting/responding parties.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer No

Document Name

Comment

Security requirements should reside in CIP-012 as it pertains to the transfer of secure data between control centers. With similar requirements in IRO-010 and TOP-003 as well as CIP-012, entities are placed in a situation where multiple standards provide overlapping mandates.

The NERC standard should not be in the process of conflict resolution. Instead, this should be part of contractual obligations agreed upon between entities.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response**Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO**

Answer

No

Document Name

Comment

The MRO NSRF is concerned about 'securely transferring data or information':

{C}· Potential NERC CIP-012 double jeopardy

{C}· Security requirement should reside in the CIP suite of standards.

The MRO NSRF suggests removing 'securely' from Requirement IRO-010 & TOP-003 R1.8 and TOP-003 R2.8.

It is not advisable to have a NERC Reliability Standard address a conflict resolution processes between two Registered Entities. To the extent that one or both entities seek such a process, it should be outside of a compliance requirement. The MRO NSRF suggests removing Requirement IRO-010 & TOP-003 R1.7 and TOP-003 R2.7.

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response**LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF**

Answer

No

Document Name

Comment

The proposed changes appear to match the old requirements in TOP-003-5 R5. However, it is unclear why the original language was insufficient so it is not clear any change is needed.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

Current industry practices and Standards (IRO-010-3 R3 and TOP-003-4 R5) already have proven and effective practices and methods in place regarding the data specification. Modification and additional documentation of these practices and methods would cause confusion and pose an undue burden on processes that already work well without adding additional reliability to the BES.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports EEI's comments.

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer No

Document Name

Comment

There may be difficulties with the creator of a specification being made responsible for determining "mutually agreed upon" data formats, security protocols, and conflict resolution processes. Demonstrating compliance with such a requirement would require the creator of the specification to maintain evidence that each recipient of the specification has agreed with those "mutually agreed upon" criteria.

Removing the "mutually agreed upon" language would make these requirements more feasible for the RC/TOP/BA. If the "mutually agreed upon" language is removed from the RC/TOP/BA requirement, provisions may need to be made for recipients of the specification to use either the defined criteria or a "mutually agreed upon" alternative in complying with the recipient requirement.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer No

Document Name

Comment

AZPS does not agree that the modifications represent a substantial change to the currently existing IRO-010 and TOP-003 language.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

BPA believes this is additional administrative burden without a corresponding reliability improvement.

Likes 0

Dislikes 0

Response

Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CEHE supports the comments as submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3**Answer** No**Document Name****Comment**

Exelon supports comments submitted by EEI.

Likes 0

Dislikes 0

Response**Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.****Answer** No**Document Name****Comment**

Portland General Electric Company supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response**James Baldwin - Lower Colorado River Authority - 1****Answer** No**Document Name****Comment**

LCRA TSC believes security requirements should reside in CIP-012 as it pertains to the transfer of secure data between control centers. With similar requirements in IRO-010 and TOP-003 as well as CIP-012, entities are placed in a situation where multiple standards provide overlapping mandates.

Likes 0

Dislikes 0

Response**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman****Answer** No

Document Name	
Comment	
MPC supports comments submitted by the MRO NERC Standards Review Forum.	
Likes 0	
Dislikes 0	
Response	
Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Current industry practices and Standards (IRO-010-3 R3 and TOP-003-4 R5) already have proven and effective practices and methods in place regarding the data specification. Modification and additional documentation of these practices and methods would cause confusion and pose an undue burden on processes that already work well without adding additional reliability to the BES. Also, security requirement should reside in the CIP suite of standards to avoid the potential for NERC CIP-012 double jeopardy. The NERC standard should not be in the process of conflict resolution. Instead, this should be part of contractual obligations agreed upon between entities. Santee Cooper also believes this is additional administrative burden without a corresponding reliability improvement.	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
<p>The MRO NSRF is concerned about 'securely transferring data or information:</p> <ul style="list-style-type: none"> &bull; Potential NERC CIP-012 double jeopardy &bull; Security requirement should reside in the CIP suite of standards. <p>The MRO NSRF suggests removing 'securely' from Requirement IRO-010 & TOP-003 R1.8 and TOP-003 R2.8.</p>	

It is not advisable to have a NERC Reliability Standard address a conflict resolution processes between two Registered Entities. To the extent that one or both entities seek such a process, it should be outside of a compliance requirement. The MRO NSRF suggests removing Requirement IRO-010 & TOP-003 R1.7 and TOP-003 R2.7.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI does not agree that the changes made represent any substantive improvement over what currently exists within IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institue (EEI) for question #3.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer No

Document Name

Comment

LCRA TSC believes security requirements should reside in CIP-012 as it pertains to the transfer of secure data between control centers. With similar requirements in IRO-010 and TOP-003 as well as CIP-012, entities are placed in a situation where multiple standards provide overlapping mandates.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

No

Document Name

Comment

Tri-State is concerned about using the word "securely" in R1 1.8 and recommends removing it. This could be possible double jeopardy with CIP-012.0

Likes 0

Dislikes 0

Response

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer

No

Document Name

Comment

The SRC disagrees with the inclusion of the intermediary in Part 1.7. As stated above, entities are successfully able to utilize an intermediary today. We do not see value in adding this commercial (contractual) provision to a mandatory reliability standard. Further, as this project was initiated pursuant to the Standards Efficiency Review (SER), the goal of this effort is to simplify (versus complicate) administrative burdens for entities issuing the data specification to keep track of intermediaries. We do not agree that the relocation of R5 requirements into R1 would benefit or reduce administrative burdens to the TOP, BA, or RC.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer

No

Document Name

Comment

Cowlitz PUD supports negative comments by others in this regard and will review SDT responses to these commentors.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer

No

Document Name

Comment

We do not believe the changes made represent any substantive improvement over what currently exists within IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Ayslynn Mcavoy - Arkansas Electric Cooperative Corporation - 3

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

The NAGF agrees with the proposed modifications to require the data specification to specify mutually agreed upon format, conflict resolution process, and security protocols or methods for securely transferring data or information.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer Yes

Document Name

Comment

AES Clean Energy agrees with the proposed modifications and believes that they will provide much needed guidance.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer Yes

Document Name

Comment

Section TOP-003-6 R1.8 in referenced redline document is blank. Agree with rational document comments regarding agreed upon method for secure transfer.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE

Answer

Yes

Document Name

Comment

PNMR agrees.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Yes

Document Name

Comment

No comment

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer	Yes
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Document Name	
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Comment

Likes 0	
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Dislikes 0	
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Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer	Yes
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Document Name	
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Comment

Likes 0	
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Dislikes 0	
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Response

Josh Combs - Black Hills Corporation - 3

Answer	Yes
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Document Name	
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Comment

Likes 0	
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Dislikes 0	
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Response

Carl Pineault - Hydro-Quebec Production - 5

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	
Document Name	
Comment	
<p>BC Hydro appreciates the opportunity to comment and thanks the drafting team for their efforts.</p> <p>BC Hydro notes that currently effective IRO-010 and TOP-003 versions use “mutually agreeable” wording as an inference of an industry acceptable solution. The proposed drafts use “mutually agreed upon” (e.g. within Requirement R1 Part 1.6 and Part 1.8 in case of proposed IRO-010-5), which will set a compliance expectation that an agreement on format be reached before its inclusion in the documented specification mandated under R1.</p> <p>BC Hydro recommends considering changing “mutually agreed upon” to “mutually agreeable”. This will reduce the changes from the existing version and the additional compliance expectation implied by “agreed upon”.</p>	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
<p>Please see Texas RE’s answer to #2.</p>	
Likes 0	
Dislikes 0	
Response	

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Document Name

Comment

We support NPCC's comments:

We do not believe the changes made represent any substantive improvement over what currently exists within IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We do not believe the changes made represent any substantive improvement over what currently exists within IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Sheraz Majid - Hydro One Networks, Inc. - 1

Answer

Document Name

Comment

Support comments by NPCC RSC.

Likes 0

Dislikes 0

Response

4. IRO-010-5 and TOP-003-6 require general data specifications to allow the Reliability Coordinator, Transmission Operator, and Balancing Authority to perform its Operational Planning Analysis, Real Time Assessment, Real-time monitoring (undefined term), and BA analysis functions (undefined term). The SDT focused on data and information generally rather than prescriptive requirements. Do you believe that all data and information needed by the RC, TOP, and BA to perform these reliability tasks (for example, PMU streaming, outage coordination, distribution, generator fuel information, etc.) is available pursuant to the proposed standards or is additional clarification needed that is more prescriptive.

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer No

Document Name

Comment

The SRC strongly believes that more prescriptive standards result in less flexibility. It is easier for an entity to change the details within its specification than to change the details of a mandatory requirement once established in a NERC standard. Therefore, the SRC advocates for the retention of flexibility and less prescriptive requirements.

To the extent a need for additional data (that is necessary for an entity to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments) arises, entities already have the ability under the current standards to define additional “mutually agreed upon” data and the format the data is to be provided in.

To the extent an entity is unable to obtain the data necessary to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments, the SRC proposes that emphasis be placed on the dispute resolution process and the level of risk the lack of the data poses to reliably operating the BES.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer No

Document Name

Comment

LCRA TSC believes all data and information needed to perform the described reliability tasks are available pursuant to the proposed standard.

LCRA TSC does not believe additional clarification is needed that is more prescriptive.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI does not support more prescriptive requirements for IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer No

Document Name

Comment

Santee Cooper feels the industry is better served by performance-based standards rather than prescriptive data requirements and that data requirements are sufficient for the RC, TOP, and neighboring BAs to perform their functions. Again, providing prescriptive information would defeat the purpose of simplifying administrative burdens and does not add a reliability benefit; therefore, distribution of this information is not needed.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6**Answer** No**Document Name****Comment**

No, for smaller entities it would be difficult to obtain data.

Likes 0

Dislikes 0

Response**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman****Answer** No**Document Name****Comment**

MPC supports comments submitted by the MRO NERC Standards Review Forum.

Likes 0

Dislikes 0

Response**James Baldwin - Lower Colorado River Authority - 1****Answer** No**Document Name****Comment**

LCRA TSC believes all data and information needed to perform the described reliability tasks are available pursuant to the proposed standard.

LCRA TSC does not believe additional clarification is needed that is more prescriptive.

Likes 0

Dislikes 0

Response**Daniel Mason - Portland General Electric Co. - 6, Group Name** Portland General Electric Co.

Answer	No
Document Name	
Comment	
Portland General Electric Company supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Kinte Whitehead - Exelon - 3	
Answer	No
Document Name	
Comment	
Exelon supports comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	No
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	No
Document Name	

Comment

AECI supports the SDT focus on data and information generally rather than prescriptive requirements. However, entities can not be expected to provide information that may not be available to them or within their purview such as fuel supplier or local distribution system information.

The proposed TOP-003-6 R2.1 and IRO-010-5 R1.1 detail a list of data and information needed by the BA, RC, and TOP to perform OPA, Real-time monitoring, and Real-time assessment; inclusive of non-BES data and information. These revisions are not supported by the associated technical rational documents provided on the project page and seem over-reaching as the NERC Standards apply to Bulk Electric System (BES) facilities. The following excerpts from the NERC ROP are supportive of this comment:

- "Bulk Power System" means, depending on the context: (i) (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy [++]. (Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning.) (ii) Solely for purposes of Appendix 4E, Bulk Electric System.
- Reliability Coordinator - The entity that is the highest level of authority who is responsible for the Reliable Operation of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator vision.

Secondly the "Project 2014-03 Revisions to TOP and IRO Standards" SDT refer to FERC NOPR Issued November 21, 2013 (RM13-12-000), specifically paragraph 68 as the basis for the inclusion of sub-BES facilities in IRO-010-2. This action is not consistent with the facilities detailed in the NERC ROP and NERC Glossary Reliability Coordinator defined term as it specifically references BES facilities.

Likes	0
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Dislikes	0
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Response

Daniel Gacek - Exelon - 1

Answer	No
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Document Name	
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Comment

Exelon supports the comments submitted by EEI.

Likes	0
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Dislikes	0
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Response

Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer	No
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Document Name	
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Comment

CEHE supports the comments as submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer No

Document Name

Comment

AZPS does not support more prescriptive requirements for IRO-010 and TOP-003.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer No

Document Name

Comment

Data provided has been sufficient to perform studies and we feel that the example data exceeds what is necessary for the RC, TOP, and neighboring BAs to perform their functions. Providing prescriptive information would defeat the purpose of simplifying administrative burdens. Specifically, Generator fuel information is considered proprietary, and in most cases, distribution of this information is not needed.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports EEI's comments.

Likes 0

Dislikes 0

Response**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

Answer

No

Document Name

Comment

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

Response**Donald Lock - Talen Generation, LLC - 5**

Answer

No

Document Name

Comment

GO/GOPs have fuel information only as regards conditions at the plant, e.g. the number of days of coal on-hand. Problems at upstream facilities - natural gas wells, pipelines, compressor stations and the like - are not divulged by supplier companies prior to the time that they make a public announcement, to prevent giving any market participant an unfair competitive advantage (GOs trade contracts for fuel in addition to power).

Likes 0

Dislikes 0

Response**LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF**

Answer

No

Document Name

Comment

ATC thinks the data specification is general in nature to allow the applicable entities to identify their data and information needs and identify the correct NERC registered entities that have the data and information and the capability of data and information exchange. ATC is not currently experiencing any challenges in obtaining the data it needs to perform its real-time monitoring, RTA or OPA obligations. Note also that the industry continues to evolve more quickly than the NERC requirements are able to be modified. The industry is better served by performance-based standards rather than prescriptive data requirements.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer

No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

No

Document Name

Comment

Manitoba Hydro feels that an exhaustive list within the standard is not necessary.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response**Ayslynn Mcavoy - Arkansas Electric Cooperative Corporation - 3****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Russell Noble - Cowlitz County PUD - 3****Answer**

Yes

Document Name**Comment**

While Cowlitz PUD agrees with the SDT intent, the added requirements detract from this objective.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 6****Answer**

Yes

Document Name**Comment**

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Yes

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Yes

Document Name

Comment

The identification of data and information needed by the RC, BA, TOP shall be left to their discretion. So, a standard focused on general data and information, and which is less prescriptive is preferred.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer

Yes

Document Name

Comment

While past specifications in our Reliability Area actually went beyond OPA, RTA, Real-time Monitoring and BA analysis functions, over time, revisions to the specification have been focusing the specifications on those specific reliability functions. Within those functions, the specifications have been pretty comprehensive. Prescriptive requirements go against NERC's standard development principles to be more performance oriented than prescriptive. We continue to support performance oriented requirements.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE

Answer

Yes

Document Name

Comment

PNMR agrees.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name

Comment

To the degree that SIGE understands the question correctly, we agree that the standard does not need to be more prescriptive regarding the data and information specification requirements. More prescriptive requirements do not add a reliability benefit.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

BPA believes data and information needed is available today.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Yes

Document Name

Comment

AES Clean Energy supports the SDT focus on data and information generally rather than prescriptive requirements.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF supports the SDT focus on data and information generally rather than prescriptive requirements. However, GO/GOPs can not be expected to provide information that is not available to them or within their purview such as fuel supplier or local distribution system information.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

While AEP agrees with the concept of an agreed-upon approach rather than a prescriptive one, we believe as previously stated in the response to Question 1, that there will be instances where the Transmission Operator needs data from the Reliability Coordinator (i.e. load information, generation and load forecasts, etc.). Once again, the RC is not included as an Applicable Entity in TOP-003, nor is it obligated under TOP-003 R5. AEP recommends that the RC be added as a Applicable Entity for TOP-003 and also included in the obligations of R5.

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

Yes

Document Name

Comment

Should be up to the entities to communicate and come to an agreement if additional clarification is needed. More prescriptive Requirements could increase burdens and “one-size-fits-all” does not necessarily work with TOP-003 or IRO-010 (therein lies the bulk of the administrative burden). Possibly providing definitions for “Real-time monitoring” and “BA analysis functions” would be helpful to keep consistency across universal tasks/functions and lowering ambiguity with those overarching data spec terms.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Melanie Wong - Seminole Electric Cooperative, Inc. - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Marc Sedor - Seminole Electric Cooperative, Inc. - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheraz Majid - Hydro One Networks, Inc. - 1

Answer

Document Name

Comment

Need clarity on what is "information", e.g. weather, news, notifications received via email, etc.? Request clarity from SDT on this.

+support comments by NPCC RSC.

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We do not support more prescriptive requirements for IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Document Name

Comment

We do not support more prescriptive requirements for IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

General data specifications within the Standard are acceptable, however, Texas RE suggests that, rather than putting more prescriptive language in the requirements, the data specification document from the RC, TOP, and BA be required to be more specific. That way, the RC, TOP, and BA can determine which specific data is needed to be effective to perform their OPA, RTA, and Real-time monitoring.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer**Document Name****Comment**

Because there are two questions being asked in question four, the actual 'Yes / No' answer is found in the following prose.

Yes, the MRO NSRF feels the proposed language, as it relates to the actual data and information needed by the RC, TOP, and BA to perform these reliability tasks, is available pursuant to the proposed standards. No additional clarification is required, as it relates to the actual data and information needed by the RC, TOP, and BA to perform these reliability tasks.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer**Document Name****Comment**

Because there are two questions being asked in question four, the actual 'Yes / No' answer is found in the following prose.

Yes, the MRO NSRF feels the proposed language, as it relates to the actual data and information needed by the RC, TOP, and BA to perform these reliability tasks, is available pursuant to the proposed standards. No additional clarification is required, as it relates to the actual data and information needed by the RC, TOP, and BA to perform these reliability tasks.

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

5. To support the proposed modifications, the SDT revised the VSLs in both IRO-010-5 and TOP-003-6 to account for the clarified data specification criteria. Do you agree? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports EEI's comments.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer No

Document Name

Comment

AZPS agrees with EEI's concerns that the primary purpose of the project was not met in this draft and therefore cannot comment on the proposed VSLs.

Likes 0

Dislikes 0

Response

Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

The primary purpose of this project was to reduce the unnecessary compliance burdens associated with evidence and data retention that was the key justification for opening this project. Until this is done, CEHE cannot comment on the appropriateness of the proposed changes to the VSLs.

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl

Answer No

Document Name

Comment

AECl is not fully supportive of the proposed TOP-003-6 R2.1 and IRO-010-5 R1.1 draft language, which is reflected in the VSLs for the corresponding requirements.

Likes 0

Dislikes 0

Response	
Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	No
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes	0
Dislikes	0
Response	
Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.	
Answer	No
Document Name	
Comment	
Portland General Electric Company supports the comments submitted by EEI.	
Likes	0
Dislikes	0
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
<p>Despite FERC accepting the VRF for the previous version of this standard, the VRF for R1 (low) seems to us inconsistent with respect to the VRF for R3 (medium). The requirement for an RC (in IRO-010) to identify information essential to reliability (R1.1) cannot logically be less important than an entity's communication of that same information to the RC. Indeed, since an RC's obligation applies to potentially many entities in its Area, it is more impactful for the RC Area's reliability that the RC correctly identify the information needed to satisfy its own reliability obligations than for a single respondent to fail to communicate the information. The VRF for R1 should be moved to Medium or the VRF for R3 should be lowered to Low.</p>	

The same inconsistency holds for the proposed VSL. As proposed, the VSL for R3 attributes a severe VSL to any violation of elements 1.1 through 1.4. Meanwhile, a failure to identify an information per 1.1, 1.2 or 1.3 does not trigger the VSL which requires that at least two sub-requirements must be violated to qualify for VSL-low, and more subrequirements to have more serious VSL.

So, for example, a failure to report information asked for in the specification as per R1.1 or R1.2 or R1.3 is potentially a VRF-medium, VSL-severe violation of R3, whereas the failure to identify that same information under R1 would be a VRF-low, VSL-none violation. Since the VSL is not even low, the latter is arguably not a violation at all!

We consider that an identification violation of R1.1, R1.2 or R1.3 individually should be at least as severe as a reporting violation of the same sub-requirements for a non-RC entity via R3. That is, identification violations of R1.1, R1.2 or R1.3 should be “severe”.

Finally, as noted earlier, if R1.4 is kept, it should be lumped in with 1.5 through 1.8 in the violation levels low, medium, high as equivalently administrative in nature and not core to the specification’s reliability content per R1.1, R1.2, and R1.3.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer

No

Document Name

Comment

The key justification for opening this project was to reduce the unnecessary compliance burdens associated with evidence and data retention; Santee Cooper has concerns that the purpose was not met in this draft and therefore cannot comment on the proposed VSLs.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

No

Document Name

Comment

Despite FERC accepting the VRF for the previous version of this standard, the VRF for R1 (low) seems to us inconsistent with respect to the VRF for R3 (medium). The requirement for an RC or TOP to identify information essential to reliability (R1.1 in both IRO-010 and TOP-003) cannot logically be less important than an entity’s communication of that same information to the RC or TOP. The same inconsistency holds for the proposed VSL.

So, for example, a failure to report information asked for in the specification as per R1.1 or R1.2 or R1.3 is potentially a VRF-medium, VSL-severe violation of R3 in IRO-010, whereas the failure to identify that same information under R1 would be a a VRF-low, VSL-none violation. Since the VSL is not even low, the latter is arguably not a violation at all.

Finally, as noted earlier, if R1.4 is kept, it should be lumped in with 1.5 through 1.8 in the violation levels as equivalently administrative in nature and not core to the specification's reliability content per R1.1, R1.2, and R1.3.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEl does not support the changes made to the VSLs. The primary purpose of this project was to reduce the unnecessary compliance burdens associated with evidence and data retention that was the key justification for opening this project. Until this is done, we cannot comment on the appropriateness of the proposed changes to the VSLs.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institue (EEI) for question #5.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name	
Comment	
Unable to evaluate until above concerns are addressed.	
Likes 0	
Dislikes 0	
Response	
Ayslynn Mcavoy - Arkansas Electric Cooperative Corporation - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lenise Kimes - City and County of San Francisco - 1 - WECC	
Answer	Yes
Document Name	
Comment	

Agree if the Standards end up being revised as shown in redlines. That said, there may not be any benefit to have the Requirements and Parts drilled down with more specificity as shown in the modified Standards, and as commented on in this form.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer

Yes

Document Name

Comment

No comments & no concerns.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

AEP agrees with the SDT recommendation to change "did not meet" to instead state "failed to use." We believe this wording more accurately captures the spirit of the obligation itself.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF supports the revised VSLs as proposed.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Yes

Document Name

Comment

AES Clean Energy supports the revised VSLs in both IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon supports comments submitted by EEI.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE

Answer Yes

Document Name

Comment

PNMR agrees.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer Yes

Document Name

Comment

No comment

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

No comments & no concerns.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

The SRC agrees that is necessary for the SDT to adjust the VSLs so that they align with the provisions of the revised standards.

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name** CHPD**Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Julie Hall - Entergy - 6, Group Name** Entergy**Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bryan Bennett - Sempra - San Diego Gas and Electric - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

6. The SDT reviewed the other standards listed in the SAR's Detailed Description to determine whether additional changes could be proposed to the standards to address potential redundancy of requirements related to the four reliability tasks identified in IRO-010-5 and TOP-003-6 or create efficiencies reflective of the principle established by the Standards Efficiency Review initiative. Due to the criticality of the tasks and functions identified in these collateral standards, the SDT determined there is insufficient justifications for the retirement of these requirements and, therefore, the SDT is not proposing changes to these standards. Do you agree with this assessment? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

Need to see a SDT report justifying this conclusion.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #6.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

In order for EEI to support the SDT's conclusions, the SDT will need to publish their analysis and findings regarding the other identified Requirements contained in the other 7 proposed Reliability Standards identified in the Project SAR and the SER Phase 2 white paper.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer No

Document Name

Comment

Portland General Electric Company supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Exelon supports comments submitted by EEI.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CEHE recommends that the SDT consider adding TOP-010-1(i) – Real-time Reliability Monitoring and Analysis Capabilities to the list of possibly affected standards due to the requirements around data quality and accuracy of Real-time monitoring and analysis capability.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer No

Document Name

Comment

AZPS agrees with EEIs comments that in order to support the SDT’s conclusions, the SDT needs to publish their analysis and findings regarding the other identified Requirements contained in the other 7 proposed Reliability Standards identified in the Project SAR and the SER Phase 2 white paper.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports EEI's comments.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer	No
Document Name	
Comment	
To streamline the requirements of these standards, duplications should be removed as stated in the SAR. As commented in question 3 above, CIP-12 should look after security protocols.	
Likes 0	
Dislikes 0	
Response	
Lenise Kimes - City and County of San Francisco - 1 - WECC	
Answer	No
Document Name	
Comment	
Would agree if the Requirements identified in the collateral standards would include a footnote, or other type of identifier/cross-reference, indicating that they are Requirements that fall under umbrella of IRO-010 and/or TOP-003 (or list the cross-reference to collateral standards in IRO-010 and TOP-003 Standards, possibly in a table/attachment?). The redundancy between the data specs and these Standards is key contributor of administrative burdens. Clear identification within the standards from NERC's end of the crossover/redundancy would be helpful.	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ayslenn Mcavoy - Arkansas Electric Cooperative Corporation - 3	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments	
Kimberly Turco on behalf of Constellation Segement 5 and 6	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes

Document Name	
Comment	
<i>No comments & no concerns.</i>	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
No comment	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR agrees.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name

Comment

SIGE recommends that the SDT consider adding TOP-010(i) - Real-time Reliability Monitoring and Analysis Capabilities to the list of possibly affected standards due to the requirements around data quality and accuracy of Real-time monitoring and analysis capability.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Yes

Document Name

Comment

AES Clean Energy agrees with the SDT assessment to not change other existing Standards.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF agrees with the SDT decision not to change other existing standards as referenced in the approved SAR.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer Yes

Document Name

Comment

No comments & no concerns.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Bryan Bennett - Sempra - San Diego Gas and Electric - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer	Yes
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Document Name	
----------------------	--

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Ken Habgood - Seminole Electric Cooperative, Inc. - 4****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Thomas Foltz - AEP - 5****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Donald Lock - Talen Generation, LLC - 5****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We need the SDT to share their analysis and findings regarding the other identified Requirements contained in the other proposed Reliability Standards identified in the Project SAR and the SER Phase 2 white paper.

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Document Name

Comment

We support NPCC's comments : We need the SDT to share their analysis and findings regarding the other identified Requirements contained in the other proposed Reliability Standards identified in the Project SAR and the SER Phase 2 white paper.

Likes 0

Dislikes 0

Response

7. The SDT is proposing an 18-month implementation plan. Would this proposed timeframe give enough time to implement the proposed modifications in IRO-010-5 and TOP-003-6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

Southern Company endorses EEI comments which support the above response.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

Due to the concerns caused by the uncertainty of the potential impacts of the quality and availability performance metrics, it is difficult to determine what the proper implementation time should be.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports EEI's comments.	
Likes	0
Dislikes	0
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 6	
Answer	No
Document Name	
Comment	
AZPS does not support the proposed changes and cannot comment on the proposed implementation plan timeframe.	
Likes	0
Dislikes	0
Response	
Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CEHE does not support the proposed changes made to IRO-010-5 and TOP-003-6, and therefore cannot comment on the sufficiency of the proposed 18-month implementation plan.	
Likes	0
Dislikes	0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Exelon supports comments submitted by EEI.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer No

Document Name

Comment

Portland General Electric Company supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer No

Document Name

Comment

Due to the concerns caused by the uncertainty of the potential impacts of the quality and availability performance metrics, it is difficult to determine what the proper implementation time should be.

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer No

Document Name

Comment

With the addition of an agreed upon security method, a 24 month time frame would be more reasonable. This will need to trickle down from the RC/BA to the TOP. Any change to security will need to be approved, vetted, and may need to be a capital project.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	No
Document Name	
Comment	
EEI does not support the proposed changes made to IRO-010-5 and TOP-003-6, and therefore cannot comment on the sufficiency of the proposed 18-month implementation plan.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institue (EEI) for question #7.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
Suggest a 24-month implementation as not sure of the impact to implement a process for question 2 criteria. "... for providing data and information that includes: specific deadlines or periodicity in which data and information is to be provided, performance criteria for availability and accuracy of data, and provisions to allow a respondent entity to update or correct data and information as necessary."	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Kimberly Turco - Constellation - 6**Answer** No**Document Name****Comment**

Suggest a 24-month implementation as not sure of the impact to implement a process for question 2 criteria. "... for providing data and information that includes: specific deadlines or periodicity in which data and information is to be provided, performance criteria for availability and accuracy of data, and provisions to allow a respondent entity to update or correct data and information as necessary."

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response**Russell Noble - Cowlitz County PUD - 3****Answer** No**Document Name****Comment**

Cowlitz PUD questions the need for an implementation plan if the standard revisions are focused on a risk-based approach and "to simplify administrative burdens" as stated in the approved SAR. The SAR did not point to any reliability deficiencies, and the SDT should avoid adding to the current requirements.

Likes 0

Dislikes 0

Response**Ayslynn Mcavoy - Arkansas Electric Cooperative Corporation - 3****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

No concerns on timeline for Manitoba Hydro.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer

Yes

Document Name

Comment

No comments & no concerns.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

The NAGF supports the proposed 18-month implementation plan.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer Yes

Document Name

Comment

AES Clean Energy supports the proposed 18-month implementation plan.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports NAGF comments

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE

Answer	Yes
Document Name	
Comment	
PNMR agrees.	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	
Comment	
The time frame seems appropriate.	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
No comment	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	

Comment

No comments & no concerns.

Likes 0

Dislikes 0

Response

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

As mentioned above, this project was initiated pursuant to the Standards Efficiency Review (SER) and the goal of this effort is to simplify (versus complicate) administrative burdens. Therefore, to the extent an 18-month implementation plan is insufficient, indicates the project has strayed from its initial objective.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

These changes are most impactful to RC, BA, and TOP's. However, it is our opinion that that the updated requirements found herein are, by and large, standard practice across the industry. Codifying these practices in the new revisions provides greater clarity and guidance surrounding data specifications.

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diane E Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Donald Lock - Talen Generation, LLC - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Thomas Foltz - AEP - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

8. Provide additional comments regarding IRO-010-5 for the SDT to consider.

Russell Noble - Cowlitz County PUD - 3

Answer

Document Name

Comment

Please note that the RC may only seek data from BA and TOP entities if it is assured DP/GO/TO data will be addressed under TOP-006. This is necessary to reduce undue burden of tracking 100's of entities.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer

Document Name

Comment

None at this time.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Document Name

Comment

- We consider the use of the word “criteria” in R3 “receiving a specification in Requirement R2 shall satisfy the documented specifications using the criteria established in Requirement Parts 1.5 through 1.8” to be misleading, since only 1.5.2 identifies criteria. Furthermore, 1.4 is more in line with 1.5 through 1.8 than with 1.1 through 1.3. So the text should refer to “1.4 through 1.8”. That said, since all these elements (1.1 through 1.8) are all required in the specification, it seems to us simpler and sufficient to write “Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a specification in Requirement R2 shall satisfy its requirements established per R1.”

- Title in header of document needs to be modified to reflect changes to the title in Section 1.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

The MRO NSRF provides the following:

1: We suggest adding verbiage to the technical rationale of both standards (or just the one if they are combined) to clarify if and when a Registered Entity is required to submit a data specification sheet to those other entities that it is already receiving real-time information from via network links.

2: The changes to the standard title and purpose (A1 and A3), specifically, the added phrase “and information” after every mention of the word “data,” add little to no value and should be undone unless the drafting team provides further clarification on the difference between data and information. For example, the team could by putting the words “electronic SCADA” in from of the word data. Additionally, the drafting team should consider using the vernacular “data or information” rather than “data and information” as the language implies these are separate.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer

Document Name

Comment

Santee Cooper believes this is additional administrative burden without a corresponding reliability improvement and does not meet the objective of simplifying the Reliability Standards that facilitate the exchange of information and data necessary to plan and operate the BES.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	
Comment	
MPC supports comments submitted by the MRO NERC Standards Review Forum.	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	
Document Name	
Comment	
<p>We consider the use of the word "criteria" in R3 "receiving a specification in Requirement R2 shall satisfy the documented specifications using the criteria established in Requirement Parts 1.5 through 1.8" to be misleading, since only 1.5.2 identifies criteria. Furthermore, 1.4 is more in line with 1.5 through 1.8 than with 1.1 through 1.3. So the text should refer to "1.4 through 1.8". That said, since all these elements (1.1 through 1.8) are all required in the specification, it seems to us simpler and sufficient to write:</p> <p>"Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a specification in Requirement R2 shall satisfy its requirements established per R1."</p>	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	

Answer	
Document Name	
Comment	
Ameren has no additional comments	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	
Document Name	
Comment	
Draft 1 of IRO-010-5 reflects a change to the standard title in Section A.1, but not in the header.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	
Document Name	

Comment

CEHE would like the SDT to define and provide examples for the term "intermediary" in IRO-010 and TOP-003.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer

Document Name

Comment

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer

Document Name

Comment

M3 of IRO-010-5 and M5 of TOP-003-6 accept as evidence, "electronic or hard copies of data transmittals or attestations of receiving entities," but only the latter option is feasible. The information sent to RCs, BAs and TOPs includes telemetered signals that are continually changing, accumulations of thousands of daily reports, and inputs to portal systems that swallow the data without a trace, making it impossible to provide for an audit a full collection

of what was sent. The only real proof of data transmittal adequacy is meanwhile that the RC, BA and TOP are satisfied, so IRO-010-5 and TOP-003-6 should require the receiving entities to issue an OK/Not OK attestation annually, rather than making this just an option, and for Not OK incidents the RC, BA and TOP should identify the deficiencies that occurred and the notifications that were sent to the transmitting entities.

IRO-010-5 and TOP-003-3 should also require RCs, BAs and TOPs to explicitly state their NERC data specifications in a single, publicly available location. Some receiving entities list a portion of their data requirements in widely scattered places in their online manuals and protocols, while other mandatory inputs are in market data reporting systems, outage scheduling software and the like. In some cases we have nothing more than an email saying, "What you're sending now is OK." It is consequently difficult to impossible at times for a GO/GOP to identify just what the IRO-010/TOP-003 data specification is.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer

Document Name

Comment

The MRO NSRF provides the following:

1: We suggest adding verbiage to the technical rationale of both standards (or just the one if they are combined) to clarify if and when a Registered Entity is required to submit a data specification sheet to those other entities that it is already receiving real-time information from via network links.

2: The changes to the standard title and purpose (A1 and A3), specifically, the added phrase "and information" after every mention of the word "data," add little to no value and should be undone.

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

Nothing further at this time

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

Document Name

Comment

No additional comments at this time.

Likes 0

Dislikes 0

Response

9. Provide additional comments regarding TOP-003-6 for the SDT to consider.

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

Document Name

Comment

No additional comments at this time.

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

Nothing further at this time

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer

Document Name

Comment

The MRO NSRF provides the following:

1: We suggest adding verbiage to the technical rationale of both standards (or just the one if they are combined) to clarify if and when a Registered Entity is required to submit a data specification sheet to those other entities that it is already receiving real-time information from via network links.

2: The changes to the standard title and purpose (A1 and A3), specifically, the added phrase “and information” after every mention of the word “data,” add little to no value and should be undone.

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer

Document Name

Comment

M3 of IRO-010-5 and M5 of TOP-003-6 accept as evidence, “electronic or hard copies of data transmittals or attestations of receiving entities,” but only the latter option is feasible. The information sent to RCs, BAs and TOPs includes telemetered signals that are continually changing, accumulations of thousands of daily reports, and inputs to portal systems that swallow the data without a trace, making it impossible to provide for an audit a full collection of what was sent. The only real proof of data transmittal adequacy is meanwhile that the RC, BA and TOP are satisfied, so IRO-010-5 and TOP-003-6 should require the receiving entities to issue an OK/Not OK attestation annually, rather than making this just an option, and for Not OK incidents the RC, BA and TOP should identify the deficiencies that occurred and the notifications that were sent to the transmitting entities.

IRO-010-5 and TOP-003-3 should also require RCs, BAs and TOPs to explicitly state their NERC data specifications in a single, publicly available location. Some receiving entities list a portion of their data requirements in widely scattered places in their online manuals and protocols, while other mandatory inputs are in market data reporting systems, outage scheduling software and the like. In some cases we have nothing more than an email saying, “What you’re sending now is OK.” It is consequently difficult to impossible at times for a GO/GOP to identify just what the IRO-010/TOP-003 data specification is.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Document Name

Comment

AEP believes that the Technical Rationale document for TOP-003 could benefit from clarity regarding the intermediaries that may be used for data pass-through. Perhaps examples could be given regarding who these entities might be, and what services they might provide. It might also be beneficial to provide insight regarding how data conflicts might be resolved when an intermediary is serving as the pass-through. Not all of these intermediaries will be registered as Function Entities, so we believe the Technical Rationale document would be the most appropriate document for this insight.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer

Document Name

Comment

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response

Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

CEHE would like the SDT to define and provide examples for the term “intermediary” in IRO-010 and TOP-003.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer	
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren has no additional comments	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	
Comment	
MPC supports comments submitted by the MRO NERC Standards Review Forum.	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	
Document Name	

Comment

None

Likes 0

Dislikes 0

Response**Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF****Answer****Document Name****Comment**

The MRO NSRF provides the following:

1: We suggest adding verbiage to the technical rationale of both standards (or just the one if they are combined) to clarify if and when a Registered Entity is required to submit a data specification sheet to those other entities that it is already receiving real-time information from via network links.

2: See Comment #2 for Q8.

Likes 0

Dislikes 0

Response**Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1****Answer****Document Name****Comment**

Version history is incomplete for TOP-003-5 (Cold Weaehar Project 2019-06 (not 221-06))

Likes 0

Dislikes 0

Response**Teresa Krabe - Lower Colorado River Authority - 5**

Answer	
Document Name	
Comment	
None at this time.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	
Document Name	
Comment	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments	
Kimberly Turco on behalf of Constellation Segement 5 and 6	
Likes 0	
Dislikes 0	
Response	

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

Version history is incomplete for TOP-003-5.

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Document Name	
Comment	
Version history is incomplete for TOP-003-5.	
Likes	0
Dislikes	0
Response	

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

Kathleen Goodman - ISO New England, Inc. - 2 - NA - Not Applicable, Group Name Standards Review Committee (SRC)

Answer

Document Name

Comment

During SRC's review of the IRO-010-5/TOP-003-6 draft Standards, the SRC identified an inefficiency inherent in the IRO/TOP family of Standards. Unlike other Standards, the IRO/TOP set are divided by functional entity rather than reliability outcome.

The SRC suggests IRO-010-5 and TOP-003-6 be merged into a single standard that could be located under a new family of Standards, e.g. "Data (DAT)," whereby the individual Requirements in the standard would indicate the Responsible Entity, similar to what is done with other Standards (i.e. MOD, PRC, TPL, COM, BAL, VAR).

The SRC further suggests consideration be given to consolidating other relevant IRO/TOP Standards when they come up for review.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

Thank you for the effort and due diligence of the SDT in proposing the new revisions and for providing us the opportunity to comment.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation has no additional comments

Kimberly Turco on behalf of Constellation Segement 5 and 6

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

Tri-State appreciates the opportunity to provide additional comments. Tri-State would like to see a better defined technical directive under IRO-010-5 R2. Under R2 it states the Reliability Coordinator is to "distribute" its data and information specification to entities that have data required by the Reliability Coordinator's Operational Planning Analyses, etc.. Tri-State would like to recommend that the SDT determine "reasonable" methods for distribution. The current distribution methods are varied in nature and are often posted in protected environments that all applicable recipients do not have access to. For example, a GO, GOP, or DP may not have authorization to an RC/BA/TOP protected reliability website and therefore do not receive "distribution" of IRO-010 or TOP-003 data requests per R2. Additionally, recipients that do have access may not be aware of new postings in these environments unless they check them consistently.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Document Name	
Comment	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	
Document Name	
Comment	
None at this time.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #10.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	

Comment

EEl was and continues to be supportive of the good work done by the SER Phase 2 Project Team and support their recommendations to address the Evidence and Retention issues in IRO-010 and TOP-003. We are also concerned that decisions were made to not consider the possible revisions to the other identified Reliability Standards in this SAR, and by the SER Phase 2 Project Team, without any documented technical justification that describes why no work can be done to address evidence, retention or overlapping requirements within those Reliability Standards. We would encourage the SDT to reconsider the proposed changes made in this first draft and we look forward to a second draft that more closely aligns with the recommendations made by the SER Phase 2 Project Team.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer**Document Name****Comment**

The MRO NSRF feels that NERC Reliability Standard IRO-010-5 & TOP-003-6 are substantially the same and duplicative of each other. Due to this, there is enough overlap to justify combining them into one standard. The MRO NSRF believes this new standard should be housed in the Communication (COM) suite of standards.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer**Document Name****Comment**

None

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer	
Document Name	
Comment	
MPC supports comments submitted by the MRO NERC Standards Review Forum.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren has no additional comments	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	
Document Name	

Comment

AECI appreciates the diligence of the SDT, their consideration of industry comment, and the opportunity to provide substantive comment.

Likes 0

Dislikes 0

Response**Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE****Answer****Document Name****Comment**

To reiterate the comments above, the initial draft appears to be heading in the opposite direction of the issues identified by the SER. CEHE does not feel that the current IRO-010 and TOP-003 drafts are addressing the issues raised by the [Standards Efficiency Review White Paper \(from 11/14/2019\)](#) that originated the Project 2021-06. Instead of simplifying administrative burdens or eliminating them altogether, these revisions are adding an administrative burden that do not have a clear benefit to reliability. Additionally, CEHE believes that these changes create redundancy with the data quality and accuracy of Real-time monitoring and analysis capability requirements in TOP-010-1(i).

Likes 0

Dislikes 0

Response**Marcus Bortman - APS - Arizona Public Service Co. - 6****Answer****Document Name****Comment**

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter****Answer****Document Name**

Comment

N/A

Likes 0

Dislikes 0

Response**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF****Answer****Document Name****Comment**

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response**Jamie Monette - Allete - Minnesota Power, Inc. - 1****Answer****Document Name****Comment**

Minnesota Power agrees with MRO's NERC Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

Response**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF****Answer****Document Name****Comment**

None.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1 - MRO,RF

Answer

Document Name

Comment

Though we disagree with some of the proposed changes as noted above, we appreciate the SDT's efforts to support system reliability through possible improvements to these standards.

Likes 0

Dislikes 0

Response

Larry Brusseau - Corn Belt Power Cooperative - 1 - MRO

Answer

Document Name

Comment

The MRO NSRF feels that NERC Reliability Standard IRO-010-5 & TOP-003-6 are substantially the same and duplicative of each other. Due to this, there is enough overlap to justify combining them into one standard. The MRO NSRF believes this new standard should be housed in the Communication (COM) suite of standards.

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer

Document Name

Comment

In the initial stage of this project, Southern raised concerns that the proposed SAR could lead to more prescriptive Data Specification standards. We argued that attempting to specify or determine what data is necessary to reliably operate the Bulk Electric System for all regions would create difficulties for requesting entities (i.e., RC, TOP, and BA) to respond quickly to changing system conditions and would not resolve the compliance issues the SAR was intending to address.

The Standard Drafting Team responded to our concerns with proposed revisions (draft 1) to the standards and by clarifying that “the intent [of the SAR] is to not be overly prescriptive so that Registered Entities may continue, as under the current standards, to request and receive the data necessary to support the four tasks identified in the applicable standards.”

We appreciate the SDT’s efforts, however, we remain concerned with revisions that go beyond the administrative issues identified in the Standards Efficiency Review. EEL’s comments raise the concerns in greater detail. We appreciate the SDT’s careful review of these matters.

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

Nothing further at this time

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

Document Name

Comment

No additional comments at this time.

Likes 0

Dislikes 0

Response

Comments received from Steven Rueckert/WECC

1. To address third party participation in data exchanges, the SDT added a provision in both IRO-010-5 and TOP-003-6 that recognizes that an applicable entity that is required to respond to the data specification may identify data and information that will be provided by a third-party intermediary. However, this provision does not shift the responsibility to respond to the data request from the applicable entity to the intermediary. Rather, the provision recognizes that an applicable entity may utilize an intermediary to pass through data and information unaltered from the entities that originated the data and information. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

Yes

No

Comments: The introduction of roles or the use of an intermediate party that is not responsible by the standard for compliance seems to add ambiguity rather than clarifying the standard. The standard language does not provide enough clarity on responsibility for providing the data/information.

R1.1 states the RC/TOP/BA *must* provide provisions (in their documented specification) including identification of applicable entities responsible for responding.

R1.4 uses the words “responsible respondent” identified in part 1.1, but those words are not used in part 1.1. This could be viewed as defining an “applicable entity” as an intermediary. If responsible entity does not use an intermediary is the “responsible entity” considered an “applicable entity” and which entity is being addressed in Part 1.1.

R2 requires distribution of the data/info specification but does not use either of the terms in R1.1 and requires distribution to “entities that have data” Is this the “responsible entity” or the “applicable entity” or both?

R3 is applicable to registered functions receiving a specification per R2. It is not clear whether the intermediary party would even receive the specification from the requestor or would operate by directive of the entity which has the source data. If a GOP has the source data are they allowed to direct a TOP to provide their data to an RC?

To summarize, there is no current prohibition on any third party providing data to a requestor. But because they are not mentioned there is also no confusion over which party is ultimately responsible. It is not necessary to establish a formal requirement for intermediaries. This seems to add unnecessary ambiguity.

These proposed revisions would require all RCs/TOPs/BAs to modify their data specifications documents and place an additional administrative obligation on the entity requesting the data/information.

At a minimum, the standard requirements need to be very clear on which registered entity is responsible and use the same terminology throughout the standard.

While we do not believe intermediaries need to be addressed a possible recommendation for language might be:

- 1.1 A list of data and information needed by the Reliability Coordinator (or TOP or BA) to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessment, including non-BES data and information, external network data and information, and identification of the **applicable** registered entities responsible for responding to the specification as deemed necessary by the Reliability Coordinator (or TOP/BA).

1.4. Delete

R3. Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider **identified as an entity responsible for responding to the data and information specification in Part 1.1 receiving a specification in Requirement R2** shall satisfy the documented specifications **either directly or through use of an intermediary as agreed to by the RC (or TOP/BA)** using the criteria established in Requirement Parts 1.5 through 1.8.

2. To mitigate potential zero defect assumptions and decrease administrative burdens, the SDT revised the data specification requirements in both IRO-010-5 and TOP-003-6 to include more specificity to the protocols for providing data and information that includes: specific deadlines or periodicity in which data and information is to be provided, performance criteria for availability and accuracy of data, and provisions to allow a respondent entity to update or correct data and information as necessary. Do you agree with these provisions? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

Yes

No

Comments: WECC agrees with the objective to minimize the impact of zero defect compliance. However, the standard revisions as proposed do not satisfy this objective because they require the requestor to include within the specification: Specific deadlines and periodicity, and specify performance criteria for availability. The requestor's obligation to conduct Real Time Assessments could make them reluctant to publish more relaxed performance criteria for some data elements and the task of identifying the performance requirements for each type of data or information element would be onerous to the requestor.

Suggested improvement

1.5. Protocols for the responsible respondent identified in Part 1.1 to provide data and information that includes, but is not limited to:

1.5.1 **Target Specific** deadlines and periodicity in which data and information is to be provided;

1.5.2 **Criteria for communications and resolution during periods when data exchange is interrupted, source data is not available or to address known inaccuracies.**
~~interruption Performance criteria for the availability and accuracy of data and information, as applicable;~~

1.5.3 Provisions to update or correct data and information, as applicable or necessary.

3. To improve administration of data and information for the applicable entities, the SDT modified IRO-010-5 and TOP-003-6 to require the data specification to specify mutually agreed upon format, conflict resolution process, and security protocols or methods for securely transferring data or information. Do you agree with these modifications? If you do not agree, or if you agree but have comments or suggestions for the SDT, please provide your recommendation and explanation.

Yes

No

Comments: It is unclear how a mutually agreed upon format, conflict resolution process and security protocols could be included in a Data specification prior to it being distributed to the entities responsible for responding? That does not seem like it would be "mutually agreeable." It appears that it would be developed and directed by the requestor. The current standards IRO-010 and TOP-003 correctly include the provisions of mutual agreeable formats, conflict resolution and security protocols in requirements for the responding entity as part of their response obligations. Such that each entity may coordinate with the requestor as needed. WECC believes a modification to address these items is unnecessary.

However, if the desire is to move this into the area of responsibility of the requestor a possible suggestion is:

1.6 **Identification of a preferred format.**

1.7. **Identification of a preferred process for resolving conflicts between the Reliability Coordinator, the entity responsible for responding identified in Part 1.1**

1.8. **Identification of the preferred security protocol or method for securely transferring data and information.**

1.9 **The preferred elements in Part 1.6, 1.7, and 1.8 may be modified though documented mutual agreement between the data requestor and the entity responsible for responding.**

4. IRO-010-5 and TOP-003-6 require general data specifications to allow the Reliability Coordinator, Transmission Operator, and Balancing Authority to perform its Operational Planning Analysis, Real Time Assessment, Real-time monitoring (undefined term), and BA analysis functions (undefined term). The SDT focused on data and information generally rather than prescriptive requirements. Do you believe that all data and information needed by the RC, TOP, and BA to perform these reliability tasks (for example, PMU streaming, outage coordination, distribution, generator fuel information, etc.) is available pursuant to the proposed standards or

is additional clarification needed that is more prescriptive?

Yes

No

Comments: While R1 and Part 1.1 as written appear to satisfy the intent of a generic data request, Part 1.2 and 1.3 are inconsistent with this idea by making requirements for very specific data.

WECC believes a preferable process would be to remove specific data items and allow R1 and R1.1 to stand alone. An even better approach may be to consider allowing the requestor to request ANY planning and operational data needed for it to monitor its area to maintain reliability during normal and abnormal conditions and not restrict it to data associated with OPA, RT monitoring and RTA.

5. To support the proposed modifications, the SDT revised the VSLs in both IRO-010-5 and TOP-003-6 to account for the clarified data specification criteria. Do you agree? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

Yes

No

Comments: No comment

6. The SDT reviewed the other standards listed in the SAR's Detailed Description to determine whether additional changes could be proposed to the standards to address potential redundancy of requirements related to the four reliability tasks identified in IRO-010-5 and TOP-003-6 or create efficiencies reflective of the principle established by the Standards Efficiency Review initiative. Due to the criticality of the tasks and functions identified in these collateral standards, the SDT determined there is insufficient justifications for the retirement of these requirements and, therefore, the SDT is not proposing changes to these standards. Do you agree with this assessment? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

Yes

No

Comments: However, if redundancies in data delivery exist it does establish the possibility of having more than one non-compliance for the same issue. This could be identified and resolved with Enforcement Discretion as needed.

7. The SDT is proposing an 18-month implementation plan. Would this proposed timeframe give enough time to implement the proposed modifications in IRO-010-5 and TOP-003-6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

Yes

No

Comments: No Comment. WECC believes the entities responsible for implementing any revisions are best suited to comment on the length of the implementation plan.

8. Provide additional comments regarding IRO-010-5 for the SDT to consider.

Comments: Please see response to question 10

9. Provide additional comments regarding TOP-003-6 for the SDT to consider.

Comments: Please see response to question 10

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

Comments: WECC questions if it is really necessary to mandate that the entity that needs operational data create a and maintain a formal document?

If it is truly desired to reduce administrative burden, then WECC suggests having IRO-010 and TOP-003 focus on giving the requestors (RC/TOP/BA) the “Authority” to request and collect the data and information in the frequency and format needed.

Since the data needed can vary widely based on the needs of the requestor, the only enforceable requirement for the requestor should be that they formally make the requests to the entity that has the data.

It should not be necessary to provide and maintain single large data specification primarily for audit purposes. This seems to add administrative burden

The standard could be simplified to two simple requirements.

R1 specify requestor has clear authority to request data and is *required* to communicate those requests to the providers of the data/info.

Measurement would include records of the request.

It could be optional to the requestor based on its needs if they wished to maintain and send a formal catalog of requested data to everyone or provide a simple request for specific data via email or other communication to an entity. Their request could provide any or all of the elements in the subparts of R1 at the discretion of the requestor as needed to get the data/info they need.

R2 would be the requirement for entities to comply with the data/information request.

Measurement would be documentation the request was complied with.

There would be little need to perform periodic audits of this requirement. Other Standards that measure performance of the data requestor would demonstrate if the entities received the data they needed by satisfactory performance of other standards that depend on the data. Failure to comply by the entity receiving the request could be addressed through the CMEP complaint process.

These suggestions are provided in an attempt to clarify the wording of the standards and reduce administrative burden. WECC thanks the drafting team for the opportunity to provide comments and suggestions.