

## Consideration of Comments

<b>Project Name:</b>	2021-06 Modifications to IRO-010 and TOP-003   Draft 2
<b>Comment Period Start Date:</b>	5/5/2023
<b>Comment Period End Date:</b>	6/21/2023
<b>Associated Ballot(s):</b>	2021-06 Modifications to IRO-010 and TOP-003 Implementation Plan AB 2 OT 2021-06 Modifications to IRO-010 and TOP-003 IRO-010-5 AB 2 ST 2021-06 Modifications to IRO-010 and TOP-003 TOP-003-6 AB 2 ST

There were 64 sets of responses, including comments from approximately 179 different people from approximately 119 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Director, Standards Development [Latrice Harkness](#) (via email) or at (404) 858-8088.

## Questions

1. To support the proposed modifications, the SDT has 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.
2. Provide any additional comments regarding IRO-010-5 for the SDT to consider.
3. Provide any additional comments regarding TOP-003-6 for the SDT to consider.
4. Provide any additional comments for the SDT to consider, if desired.

## The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

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
Midcontinent ISO, Inc.	Bobbi Welch	2	MRO,RF,SERC	ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010_TOP-003	Ali Miremadi	CAISO	2	WECC
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Helen Lainis	IESO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Bobbi Welch	MISO	2	RF
					Greg Campoli	NYISO	2	NPCC
					Elizabeth Davis	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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	Glen Pruitt	1		CHPD Voters	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Rebecca Zahler	Public Utility District No. 1 of Chelan County	5	WECC
					Anne Kronshage	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
					John Nierenberg	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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Ryan Strom	Buckeye Power, Inc.	1,5	RF
					Ryan Strom	Buckeye Power, Inc.	1,5	RF
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and	5	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Light Department		
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO



Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
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	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern	1	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Company Services, Inc.						Company Services, Inc.		
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	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
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					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
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Joshua London	Eversource Energy	1	NPCC
Stephen Whaite	Stephen Whaite			ReliabilityFirst Ballot Body	Lindsey Mannion	ReliabilityFirst	10	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
				Member and Proxies	Stephen Whaite	ReliabilityFirst	10	RF
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					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



<p><b>1. To support the proposed modifications, the SDT has 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.</b></p>	
<p><b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b></p>	
Answer	No
Document Name	
<p><b>Comment</b></p>	
<p>The word “use” in VSLs does not apply to all criteria (e.g., R5.) BPA suggests a change to either “meet” or “satisfy.”</p>	
Likes	0
Dislikes	0
<p><b>Response</b></p>	
<p>Thank you for your comment. The standard drafting team (SDT) has revised the VSL to incorporate your suggestion.</p>	
<p><b>Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies</b></p>	
Answer	No
Document Name	
<p><b>Comment</b></p>	
<p>As noted in the comments for questions 2 and 3, RF does not support the inclusion of the “mutually agreeable” language in the clarified IRO-010 R1 and TOP-003 R1 and R2 data specification criteria. The criteria containing the “mutually agreeable” language are referenced in the IRO-010 R1/R3 and TOP-003 R1/R2/R5 VSLs, so RF has selected a “No” response for this question.</p>	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. The use of "mutually agreeable" language is legacy language pertaining to conflict resolution, transfers, and format. Since these concepts are already approved by FERC as a necessary part of these requirements, the SDT decided to retain.	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
Answer	No
Document Name	
<b>Comment</b>	
By adding more specific requirements to R1.5, the requestor and receiver must track progress and ensure they are meeting those requirements. This would add administrative burden for the requestor and receiver and possibly add zero defect requirements. The requirements in R1.5 appear to build upon 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
<b>Response</b>	
Thank you for your comment. The SDT reviewed the noted concerns but believes any additional administrative burden will provide both clarity of expectations and removal of a zero-defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.	
<b>Casey Perry - PNM Resources - 1,3 - WECC, Texas RE</b>	
Answer	No
Document Name	
<b>Comment</b>	

Recommend “and/or” statement in the Standard Requirements and VSL’s due to not clear on what information is included in the “and information” statement.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The SDT discussed the concern and determined to keep the language as currently written, based on the understanding that the requestor's specification must include both the data and information it needs to perform its operational reliability tasks.

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

**Answer**

No

**Document Name**

**Comment**

The proposed edits to the VSL tables (IRO-010-5 / R3 and TOP-003-6 / R5), in conjunction with the requirement sub-parts referenced therein, fail to add sufficient clarity. Considering IRO-010-5 for example, the VSL table for R3 references “the criteria in Requirement R1 Parts 1.5” [should it be “Part 1.5” (no “s”)]. R1 Part 1.5 addresses “methods for the entity identified in Part 1.1 to provide data and information”. Is a method for providing data and information synonymous with a criteria for the data and information? Since R1 Part 1.5.2 is the only sub-part to mention performance criteria (as determined by the RC), was it the intent of the drafting team to make the VSL table refer to it (i.e., “...criteria in Requirement R1 Part 1.5.2”)?

With regard to the SAR’s stated purpose to “limit unnecessary data retention requirements that do not contribute to BES reliability and resiliency”, we note that the data retention period for those that provide data and information is unchanged in these Draft 2 standards. The submitting entity is required to “retain evidence for the most recent 90-calendar days that it has satisfied the obligations of the documented specifications.” However, if the entity’s last audit period has been more than 90 days ago (highly probable), “the CEA may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit”. How does this address the unnecessary data retention concern cited in the SAR?

Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. The SDT agrees with your comments regarding singular use of Part, and that using "criteria" may create potential ambiguities and updated the VSL to clarify. In considering the recommendations for data retention in the SAR relating to keeping evidence for an entire audit period, the SDT also considered a subsequent order from FERC rejecting proposed revisions to the NERC Rules of Procedure relating to evidence retention. See N. Am. Elec. Reliability Corp., 179 FERC 61,129 (2022). In that order, FERC stated, "[W]e find that the proposed changes to evidence retention...could result in time periods for which a registered entity may not have sufficient evidence needed to demonstrate compliance. Further, establishing an evidence retention period shorter than the audit period itself, or less than the periods outlined in the Reliability Standards, weakens the incentive for registered entities to remain compliant and demonstrate that compliance with all applicable Reliability Standards at all times." (P 37). Based on the above, the SDT determined not to modify the existing data retention provisions at this time.</p>	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The addition of the words "and Information" to the VSLs does not provide a meaningful change. Further clarification is required on what "information" is being requested.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. The drafting team added "and information" to capture types of information not typically associated with the industry's perception of "data" being the "bits and bytes" and how telemetry and SCADA, for example, statuses are perceived. Please see the SDT's white paper for further explanation of the topic.</p>	
<b>Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AZPS Agrees with the proposed modification to the VSLs in both IRO-010-5 and TOP-003-6.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

BC Hydro appreciates the Standard Drafting Team’s efforts and the opportunity to comment. We noted that in the Violation Severity Levels for Requirements R3 of IRO-010-5 and R5 of TOP-003-6, the “obligations of the” wording was removed. Requirements R3 and R5 and their associated measures maintain the “shall satisfy the obligations of the documented specifications” wording.

BC Hydro suggest that the wording be revised to align the Requirements and VSLs for consistency; otherwise, please provide clarification on the materiality of these distinctions if they were intentional.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see changes made to the VSL for R3 and R5.

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

**Answer**

Yes

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

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

**Answer**

Yes

**Document Name**

<b>Comment</b>	
Southern Company supports the comments provided by EEI.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment and support.	
<b>Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Groups supports EEI and NAGF comments.	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
The NAGF supports the proposed VSL revisions in both IRO-010-5 and TOP-003-6.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
None	
Likes	0
Dislikes	0
<b>Response</b>	



Thank you for your support.	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Nicolas Turcotte - Hydro-Quebec (HQ) - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>R1 Low VRF in VSL Table: "The Reliability Coordinator did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".</p> <p>Version history table: Version 3 indicates that FERC approved IRO-010-2 in Docket RD20-4-000. Please correct to IRO-010-3 as v3 was part of the Standards Alignment with Registration Project in RD20-4-000.</p> <p>Suggest for IRO-010-5 adds 1.5.2 which says, "Performance criteria for the availability and accuracy of data and information, as applicable." (for RCs)</p>	

Please consider that adding a new requirement to IRO-010-5 involving the availability and accuracy of data and information may increase administrative burden.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The SDT accepts your suggested change to the VSL table and the version table will be reconciled for the final ballot. The SDT reviewed the noted concerns but believes any additional administrative burden will provide both clarity of expectations and removal of a zero-defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.

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

**Answer**

Yes

**Document Name**

**Comment**

EEl does not object to the changes made to the VSLs in IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

**Response**

Thank you for your comment and support.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

Yes

**Document Name**

**Comment**

Texas RE noticed the following in the VSLs for TOP-003-6:

- In order to be consistent, Texas RE recommends adding “and information” in the latter part of the “or” statement in the R1 and R2 severe VSL.
- It appears that in the R4 VSL, data should not be capitalized.
- In the high VSL for R5, it should state R1.5, not R15.

Texas RE noticed the following the VSLs for IRO-010-5:

- In order to be consistent, Texas RE recommends adding “and information” in the latter part of the “or” statement in the R1 severe VSL.
- In the Lower, Moderate, and High VSLs for R3, “part” should not be plural since it is only referencing Part 1.5.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The SDT agrees and has made conforming changes regarding data not being capitalized. The SDT discussed the concern and determined to keep the language as currently written, based on the understanding that the requestor's specification must include both the data and information it needs to perform its operational reliability tasks.

**Daniel Gacek - Exelon - 1**

**Answer**

Yes

**Document Name**

**Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response**

Thank you for your support.	
<b>Kinte Whitehead - Exelon - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by the EEI.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren supports EEI's comments on this project.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 3 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0

<b>Response</b>	
Thank you for your support.	
<b>Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name</b> CHPD Voters	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Julie Hall - Entergy - 6, Group Name</b> Entergy	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Donald Lock - Talen Generation, LLC - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>James Keele - Entergy - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Michael Courchesne - ISO New England, Inc. - 2 - NPCC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	



Thank you for your support.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</b>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2</b>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	

<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Diana Torres - Imperial Irrigation District - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Ruchi Shah - AES - AES Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Joshua London - Eversource Energy - 1, Group Name Eversource**

**Answer** Yes

**Document Name**

**Comment**

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>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</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	

Thank you for your support.	
<b>Junji Yamaguchi - Hydro-Quebec (HQ) - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Teresa Krabe - Lower Colorado River Authority - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>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</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	



Thank you for your support.	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Pedro Juarez, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Stephen Stafford - Georgia Transmission Corporation - NA - Not Applicable - SERC</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your support.	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010_TOP-003</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Mike Magruder - Avista - Avista Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Portland General Electric Company supports comments provided by the EEI.	
Likes 0	

Dislikes 0

## Response

Thank you for your support.

<b>2. Provide any additional comments regarding IRO-010-5 for the SDT to consider.</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>R1 Low VRF in VSL Table: “The Reliability Coordinator did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.</p> <p>Version history table: Version 3 indicates that FERC approved IRO-010-2 in Docket RD20-4-000. Please correct to IRO-010-3 as v3 was part of the Standards Alignment with Registration Project in RD20-4-000.</p> <p>Suggest for IRO-010-5 adds 1.5.2 which says, “Performance criteria for the availability and accuracy of data and information, as applicable.” (for RCs)</p> <p>Please consider that adding a new requirement to IRO-010-5 involving the availability and accuracy of data and information may increase administrative burdens.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. The SDT team accepts your suggested change to the VSL table and the version table will be reconciled for the final ballot. The SDT reviewed the noted concerns but believes any additional administrative burden will provide both clarity of expectations and removal of a zero-defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.</p>	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
It is not clear how broadening the scope of the standard from a data specification which is clear, to an overly broad data and information specification adds clarity. It would be more beneficial if the standard covered clear requirements for a data specification that supported Operation Planning Analysis, Real-time monitoring and Real-time Assessment criteria. Information should be clearly defined.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support. The SDT is not proposing any substantive changes and believes the current language is not overly broad but sufficient to achieve the stated purpose of the standard.	
<b>Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010_TOP-003</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No comment	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	
<b>Document Name</b>	



Comment	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your comments.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
Answer	
Document Name	
Comment	
OPG supports NPCC Regional Standards Committee's comments.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
Answer	
Document Name	
Comment	

We suggest that the standard title reflected in the page headers be consistent with the title in section A.1.

For the Purpose statement in section A.3, we suggest that “Monitor” not be capitalized since it’s not a defined term in the NERC Glossary of Terms. We would also prefer an Oxford comma be placed after monitor – “...plan, monitor, and assess...”. This would also be consistent with the purpose statement phrasing in Draft 2 of TOP-003-6.

We believe the Project reference in section A.5 should be updated to “Project 2021-06”, rather than “Project 2019-06”.

For R1/Part 1.1, we suggest the added phrase “and identification of the entity responsible for responding to the specification” be changed to “and identification of the **entities** responsible for responding to the specification”.

For R1/Part 1.5, we suggest some minor edits and re-ordering:

*1.5. Methods **and criteria** for the **entities** identified in Part 1.1 to provide data and information that includes, but is not limited to:*

*1.5.1 A mutually agreeable method(s) for securely transferring data and information;*

*1.5.2 A mutually agreeable format **for the data and information**;*

*1.5.3 Specific deadlines or periodicity in which data and information is to be provided;*

*1.5.4 Provisions to update or correct data and information, as applicable or necessary; and,*

*1.5.5 Performance criteria for the availability and accuracy of data and information, as applicable.*

Likes	0
Dislikes	0

**Response**

Thank you for your support. The SDT reviewed the comments and made structural, grammatical or errata non-substantive changes as necessary.

**Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allele - Minnesota Power, Inc., 1; - Hillary Creurer**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Minnesota Power agrees with EEI's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Ameren recommends section 1.5.1 to read "Mutually agreeable deadlines or periodicity in which data and information is to be provided;". Also, the proposed wording in section 1.5.5 is plurally incorrect. The wording in R3 changes from singular "specification" to plural "specifications".	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support. For Section 1.5.1, the SDT considers requirement R1.4 to address any need to resolve conflicts including any disagreements on deadlines or periodicity and is not proposing to modify the requirement as suggested. The SDT recognizes that the identification of deadlines or periodicity is best determined by the requestor who is responsible for the reliability tasks for which the data and information is needed. The grammar in Requirement 1.5.5, Requirement 3, and the associated measures have been corrected.	

<b>Kinte Whitehead - Exelon - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Casey Perry - PNM Resources - 1,3 - WECC,Texas RE</b>	
<b>Answer</b>	
<b>Document Name</b>	

**Comment**

PNM agrees with and supports EEI's comments related to IRO-010-5.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

**Answer**

**Document Name**

**Comment**

WECC generally supports the proposed revisions, but has a slight concern with the language in Part 1.4. The requirement is applicable to the RC, but requires a "mutually agreeable process." The RC could have difficulty complying with the language of Part 1.4 if the other identified entities will not agree to a process.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

1.5.5 has a grammatical error with the use of “A” (singular) and “methods” (plural). How it is corrected may change the interpretation.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support. The grammar in Requirement 1.5.5 has been corrected.	
<b>Junji Yamaguchi - Hydro-Quebec (HQ) - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>1. R1 Low VRF in VSL Table: “The Reliability Coordinator did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.</p> <p>2. Version history table: Version 3 indicates that FERC approved IRO-010-2 in Docket RD20-4-000. Please correct to IRO-010-3 as v3 was part of the Standards Alignment with Registration Project in RD20-4-000.</p> <p>Suggest for IRO-010-5 adds 1.5.2 which says, “Performance criteria for the availability and accuracy of data and information, as applicable.” (for RCs)</p> <p>Please consider that adding a new requirement to IRO-010-5 involving the availability and accuracy of data and information may increase administrative burdens.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. The SDT accepts your suggested change to the VSL table and the version table will be reconciled for the final ballot. The SDT reviewed the noted concerns but believes any additional administrative burden will provide both clarity of	

expectations and removal of a zero-defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

**Document Name**

**Comment**

Texas RE noticed the Effective Date section on both TOP-003-5 and IRO-010-5 need to be updated to reflect the implementation plan for Project 2021-06.

Texas RE noticed the applicability section is formatted inconsistently with other standards, which show:

4. Applicability

4.1 Functional Entities

4.1.1 [Functional Entity #1]

4.1.2 [Functional Entity #2]

If the SDT elects to make this change, Texas RE recommends Requirement Part 1.5 state: “Methods for the *functional* entity identified in Part 1.1 to provide the data and information that includes, but is not limited to:”

In requirement Part 1.5, “methods” should be singular.

Texas RE noticed the implementation plan contains a consideration for “developing provisions for using intermediary entities to provide data”. Texas RE recommends the requirement language reflect this idea as this regularly occurs in the ERCOT region with information from the TOP to the BA. Texas RE recommends the following language:

*1.6 Provisions for the identification of any data and information where the responsible respondent identified in Part 1.1 will utilize an intermediary party to pass through the data and information unaltered from the responsible entities to the Transmission Operator.*

This language is also consistent with CIP-012-1, which requires protection of data even through the intermediary entity.

In order to be consistent throughout the entire standard document, Texas RE recommends Section C “Compliance” be revised to remove use of “data” where included in “data specification” (in the last three paragraphs of Section C 1.2) to be consistent with proposed Requirement language changes in Requirements R2 and R3.

Texas RE recommends adding “and information” in the Evidence Retention Section for IR-010-5 Requirement R1: “The Reliability Coordinator shall retain its dated, current, in force documented specification for the data *and information* necessary...”.

In the Evidence Retention Section for IR-010-5, Texas RE suggests capitalizing Compliance Audit or saying simply audit in the third paragraph as in the first paragraph.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT has made grammatical and inconsistency changes where appropriate. The SDT did not reinsert the usage of "intermediary entities" as commenters in previous drafts were not supportive and stated that entities could manage such situations outside of a NERC Reliability Standard requirement.

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

**Answer**

**Document Name**

**Comment**

EI continues to have concerns with the proposed changes made to IRO-010-5 and question whether the proposed changes provide any discernible reliability benefits over the currently effective Reliability Standard. However, we offer the following edits to address our concerns with the current draft:

Requirement R1.



Part 1.1: The data and information should be specifically directed to “NERC registered entities” not entities “responsible for responding”. Entities who are not registered by NERC have no regulatory obligation to respond to data and information requests. Additionally, the identified NERC registered entity can only provide requested data and information that is under that entity’s direct control and access. To address these concern, the following suggested edits in bold are provided below:

A list of data and information needed by the Reliability Coordinator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, **if under the control and access of the identified NERC registered entity**, external network data and information, and identification of the **NERC registered** entity for responding to the specification as deemed necessary by the Reliability Coordinator.

Part 1.5: The methods identified should all be mutually agreed to, not just those in the subparts of Part 1.5.

Subpart 1.5.2: EEI does not support the inclusion of performance criteria for IRO-010-5 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary. Applying performance criteria to the delivery of data and information expands the administrative burden on entities creating a zero defect requirement that this project was intended to correct.

Measure M1: EEI suggests the following additional language to M1 (see bold text):

Each Reliability Coordinator shall make available its dated, current, in force documented specification for data and information **that conform to mutually agreed to methods, criteria, formats and secure transfer of data and information by the entities identified in Part 1.1.**

Likes 0

Dislikes 0

**Response**

Thank you for your comments. The SDT decided against specifying NERC registered entities since this will be inconsistent with other reliability standards. Section A 4 1 identifies the NERC functional entities. The SDT believes the mutually agreeable process for resolving conflicts in Requirement R1.4 will facilitate resolution of any conflicts. Regarding language 1.5, this process for resolution in conflict would address any issues of infusible request of data and information. Therefore, the SDT is not proposing to make these changes to Requirement R1.5.

<b>Nicolas Turcotte - Hydro-Quebec (HQ) - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>R1 and R2 Low VRF in VSL Table: “The TOP/BA did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.</p> <p>Suggest for TOP-003-6 R1 adds similar language: “Performance criteria for the availability and accuracy of data and information, as applicable.” (for TOPs)</p> <p>Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your support. The SDT reviewed the noted concerns for VSL table and have made changes where appropriate. The SDT believes any additional administrative burden will provide both providing clarity of expectations and removal of a zero defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.</p>	
<p><b>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</b></p>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for quesiton #2.</p>	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>In response to the comment RF submitted for question 3 of the previous comment period, the SDT indicated “The SDT discussed the issue [w/ requiring mutually agreeable criteria to be included in the data specifications] and notes that the legacy language includes “mutually agreeable” paradigms already, and, therefore, has decided to keep that vernacular.”</p> <p>In response to the above consideration of comments, RF notes that the legacy language places the responsibility for satisfying the obligations of the data specification using “mutually agreeable” means on the specification recipient.</p> <p>RF reinforces that the RC (R1) should not be responsible for ensuring its data specification is mutually agreeable to every specification recipient (potentially 100s of receiving entities). The "mutually agreeable" language should be removed from the proposed IRO-010-5 R1 subparts regarding data formats, security protocols, and conflict resolution processes. It is unclear how mutually agreeable formats, security protocols, and conflict resolution processes could be included in a data specification prior to it being distributed to the entities responsible for responding. As currently drafted, demonstrating criteria within a specification are mutually agreeable would require the creator of the specification to maintain evidence that each of the many recipients of the specification accepts each “mutually agreeable” criteria.</p>	
Likes	0
Dislikes	0
<b>Response</b>	

Thank you for your support. The SDT is not proposing to make any changes. The SDT believes that most data and information is already being communicated via the existing specifications under IRO-010 and TOP-003 today. The SDT believes that locating and documenting the mutually agreeable formats and methods for securely transferring data and information in the data specification helps to provide clarity both for existing recipients of the specification and new entities as well. The format and security of the data an information must typically be addressed to allow for the provision of this information and is typically already agreed to and in place today. The mutually agreeable conflict resolution process is similarly required today just not documented in the specification. This process will help to alleviate conflicts between what is requested in Requirements R1.5.1, R1.5.2 and R1.5.3 by the requestor and concerns raised by the providers (e.g., infeasibility of meeting the periodicity or deadlines) of the data and information.

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer**

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Joshua London - Eversource Energy - 1, Group Name Eversource**

**Answer**

**Document Name**

**Comment**

Eversource agrees with the comments submitted by EEI and does not support the inclusion of performance criteria for IRO-010-5 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

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

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Ruchi Shah - AES - AES Corporation - 5**

**Answer**

**Document Name**

**Comment**

AESCE understands and agrees with the need for availability and accuracy of data and information under R1.5.2. However, AESCE would like to point out that criteria to ensure data accuracy must be practical to GO/GOP resources as well as mindful of the ability to demonstrate compliance with the sub-requirement.

AESCE also supports NAGF's comment regarding these changes.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT believes the mutually agreeable process for resolving conflicts in Requirement R1.4 will facilitate resolution of any conflicts and balance the needs for reliability and GO/GOP resource impact.

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

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Diana Torres - Imperial Irrigation District - 6**

**Answer**

**Document Name**

**Comment**

None	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
Answer	
Document Name	
<b>Comment</b>	
None.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF</b>	
Answer	
Document Name	
<b>Comment</b>	
The NAGF is concerned with how a GO/GOP would demonstrate the accuracy of data and information under R1.5.2. While the NAGF understands the need for and supports the communication of accurate data/information, criteria to ensure data accuracy needs to be practical and cognizant of limited GO/GOP resources.	

For R1.5.3, the NAGF questions the value of potentially having to correct/update historical data.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT believes the mutually agreeable process for resolving conflicts in Requirement R1.4 will facilitate resolution of any conflicts and balance the needs for reliability and GO/GOP resource impact. Requirement R1.5.3 recognizes the variety of different types of data and information, some of which does require duplicating or correct data and information (e.g., models, status, capability, limitations, etc.) and is not prescriptive to allow for flexibility to account for such variety. The SDT included "as applicable or necessary" to allow for instances where it may not be appropriate or needed (e.g., static data and information that never changes).

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

**Answer**

**Document Name**

**Comment**

WEC Energy Groups supports EEI and NAGF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comments

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**



<p>Reclamation recommends the Project 2021-06 drafting team coordinate with the Project 2020-04 drafting team regarding use of the terms “availability” and “accuracy,” e.g., as used in IRO-010 R1.5.2. The CIP-012 terms “confidentiality,” “integrity,” and “availability” carry the same intent; therefore, for consistency, Reclamation recommends the language in the two standards should align.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your support. While the SDT acknowledges that there is potential for some overlap between the standards proposed by this committee and CIP-012-2 with regards to the availability of Real-time Assessment and real-time monitoring data, CIP-012 does not include Operational Planning Analysis or balancing authority analysis in its applicability and is not redundant. It is possible that a CIP-012 violation could result in a failure to meet the performance criteria set forth in a required data specification and potential violations for both TOP-003-6 and IRO-010-5. This situation is not unique to these standards and violations should be evaluated on a case-by-case basis by the ERO in its enforcement.</p>	
<b>Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF</b>	
Answer	
Document Name	
<b>Comment</b>	
N/A	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Southern Company supports the comments provided by EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response. Please see response to EEI's comment.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
The edits proposed do not meet the goals set forth by SER Phase 2 and the SAR. Industry would be better served not to open the standards.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support. The SDT is not proposing any substantive changes and believes the current language does meet the goals set forth by the SAR and documented its comprehensive review of requirements identified in SER Phase 2.	
<b>Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF</b>	
<b>Answer</b>	
<b>Document Name</b>	

**Comment**

Duke Energy is concerned with how a GO/GOP would demonstrate the accuracy of data and information under R1.5.2. Please define the implied accuracy specification and communication of data and information.

For R1.5.3, please define the parameters and limits for the correction and update of historical data.

Likes 0

Dislikes 0

**Response**

Thank you for your support. For Requirement R1.5.2, while some information may not have an applicable "accuracy" component for design or calibration, most data could have an accuracy requirement (e.g., 3% (typical of relay grade telemetry), 1% (typical of metering grade telemetry)).

Requirement R1.5.3 recognizes the variety of different types of data and information, some of which does require updating or correct data and information (e.g., models, status, capability, limitations, etc.) and is not prescriptive to allow for flexibility to account for such variety. The SDT included "as applicable or necessary" to allow for instances where it may not be appropriate or needed (e.g., static data and information that never changes). The requirement also does not specify an update of "historical" data but is flexible as needed to facilitate the needs for the RC, BA, or TOP to conduct their required reliability tasks (e.g., if historical data correction is needed to facilitate future forecast applications).

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

**Answer**

**Document Name**

**Comment**

The standards in question are becoming impractical regarding compiling compliance evidence, and rather than making them even more complex in this respect (e.g. adding, "Performance criteria for the availability and accuracy of data and information") IRO-010-5 and TOP-003-06 should roll-back some of the overreach in their previous revisions. Generating unit minimum design/historical/analysis temperature should be a once-and-done input, for example, since these values will not change in the midst of a winter storm. The same

should be done for cold weather operating limitations, with any real-time changes for fuel supply, emissions etc being reported by the same means that plants are already using for all (not just weather-related) issues affecting operations.

The Measures sections of IRO-010 and TOP-003 should also make it mandatory that receiving entities issue attestations for compliant units, rather than just leaving this as a possibility, if they use portal systems that swallow data inputs without leaving any electronic or hard copy record of transmittals.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT reviewed the noted concerns but has not proposed any additional edits for these concerns. The SDT included performance criteria for the availability and accuracy of data and information requirements to allow for the data specification to clearly identify the non-zero-defect policy for data and information as appropriate. While there may be some data and information that requires infrequent or no updates, some data information, including cold weather limitations may be updated annually or even within a season if a major cold weather event occurs to facilitate Balancing Authority analysis needs as determined by the BA. Additionally the SDT does not believe it is appropriate to include requirements in the measure sections and did not have any clear SAR scope to require attestations for compliance means from the requestors of the data information which would be overly burdensome and administrative for RC, BAs, and TOPs for all providers of the data and information.

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

**Answer**

**Document Name**

**Comment**

AZPS does not have any addition comments regarding IRO-010-5 at this time.

Likes 0

Dislikes 0

**Response**

Thank you for your support.	
<b>Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD Voters</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No comment	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

<b>3. Provide any additional comments regarding TOP-003-6 for the SDT to consider.</b>	
<b>Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD Voters</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>The title change from Operational Reliability does seem necessary as this was vague, however, the current proposed title is only descriptive of the Specification and not the data it applies to. Also, collection seems to be tacked on at the end when it should be a descriptor of the specification. The Operational Reliability title was important to understand the scope of data and information that the specification applies to. Here are some alternative options to consider:</p> <ol style="list-style-type: none"> <li>1. Transmission Operator and Balancing Authority Data, Information and Collection Specification for Operational Reliability</li> <li>2. Transmission Operator and Balancing Authority Data, Information and Collection Specification</li> <li>3. Transmission Operator and Balancing Authority Specification for Operational Reliability</li> </ol>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support. The SDT has made additional edits to the proposed title.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

While the following text was not a revision proposed by the SDT, we believe the existing phrase “in force” within M1 could be improved and clarified by using another word or phrase in its place. Potential ideas for consideration might include “currently in effect” or “as currently used in practice” so that it instead states “its dated, documented specification currently in effect for data and information” or “its dated, documented specification as currently used in practice for data and information.”

Likes 0	
Dislikes 0	

**Response**

Thank you for your comments. The SDT and decided against the suggestion since it is legacy language from other related standards.

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

<b>Answer</b>	
<b>Document Name</b>	

**Comment**

No comments

Likes 0	
Dislikes 0	

**Response**

Thank you for your response.

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

<b>Answer</b>	
<b>Document Name</b>	

**Comment**

AZPS does not have any addition comments regarding TOP-003-6 at this time.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support and comment.	
<b>Donald Lock - Talen Generation, LLC - 5</b>	
Answer	
Document Name	
<b>Comment</b>	
See our response for Question #2 above.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF</b>	
Answer	
Document Name	
<b>Comment</b>	
Please see the response for Question #2 in regard to TOP-003-6 R1.5.2 and R1.5.3.	
Likes	0



Dislikes	0
<b>Response</b>	
<p>Thank you for your support. For Requirement R1.5.2, while some information may not have an applicable "accuracy" component for design or calibration, most data could have an accuracy requirement (e.g., 3% (typical of relay grade telemetry), 1% (typical of metering grade telemetry)).</p> <p>Requirement R1.5.3 recognizes the variety of different types of data and information, some of which does require updating or correct data and information (e.g., models, status, capability, limitations, etc.) and is not prescriptive to allow for flexibility to account for such variety. The SDT included "as applicable or necessary" to allow for instances where it may not be appropriate or needed (e.g., static data and information that never changes). The requirement also does not specify an update of "historical" data but is flexible as needed to facilitate the needs for the RC, BA, or TOP to conduct their required reliability tasks (e.g., if historical data correction is needed to facilitate future forecast applications).</p>	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
Answer	
Document Name	
<b>Comment</b>	
<p>The edits proposed do not meet the goals set forth by SER Phase 2 and the SAR. Industry would be better served not to open the standards.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your support. The SDT is not proposing any substantive changes and believes the current language does meet the goals set forth by the SAR and documented its comprehensive review of requirements identified in SER Phase 2.</p>	
<b>Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Southern Company supports the comments provided by EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

Reclamation recommends the Project 2021-06 drafting team coordinate with the Project 2020-04 drafting team regarding use of the term’s “availability” and “accuracy,” e.g., as used in TOP-003 R1.5.2 and R2.5.2. The CIP-012 terms “confidentiality,” “integrity,” and “availability” carry the same intent; therefore, for consistency, Reclamation recommends the language in the two standards should align.

Reclamation recommends grammatical corrections to the Purpose section of TOP-003 to properly address two entities. For example:

Purpose: To ensure that each Transmission Operator and Balancing Authority has the data and information it needs to plan, monitor, and assess the operation of its Transmission Operator Area or Balancing Authority Area.

Likes 0

Dislikes 0

**Response**

Thank you for your support. While the SDT acknowledges that there is potential for some overlap between the standards proposed by this committee and CIP-012-2 with regards to the availability of Real-time Assessment and real-time monitoring data, CIP-012 does not include Operational Planning Analysis or balancing authority analysis in its applicability and is not redundant. It is possible that a CIP-012 violation could result in a failure to meet the performance criteria set forth in a required data specification and potential violations for both TOP-003-6 and IRO-010-5. This situation is not unique to these standards and violations should be evaluated on a case-by-case basis by the ERO in its enforcement. The SDT made changes to the purpose section as well.

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

**Answer**

**Document Name**

**Comment**

WEC Energy Groups supports EEI and NAGF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your support.	
<b>Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Please see the comments for Question #2 in regard to TOP-003-6 R1.5.2 and R1.5.3.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your support.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Diana Torres - Imperial Irrigation District - 6</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Daniel Mason - Portland General Electric Co. - 6, Group Name</b> Portland General Electric Co.	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Ruchi Shah - AES - AES Corporation - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

Same response as question 2 for TOP-003-6 1.5.2 and 2.5.2.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support. The SDT believes the mutually agreeable process for resolving conflicts in Requirement R1.4 will facilitate resolution and balance the needs for reliability and GO/GOP resource impact.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
Answer	
Document Name	
<b>Comment</b>	
N/A	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
Answer	
Document Name	
<b>Comment</b>	

Subpart 1.5.2: Eversource agrees with the comments submitted by EEI and does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary.

Subpart 2.5.2: Eversource agrees with the comments submitted by EEI and does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 2.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT is not proposing to remove Requirement R1.5.2 and R2.5.2 as this allows clarity on accuracy and availability of data and information requirements to allow for a non-zero defect compliance approach as requested in the SAR.

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer**

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see the response to EEI's comment.

**Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>In response to the comment RF submitted for question 3 of the previous comment period, the SDT indicated “The SDT discussed the issue [w/ requiring mutually agreeable criteria to be included in the data specifications] and notes that the legacy language includes “mutually agreeable” paradigms already, and, therefore, has decided to keep that vernacular.”</p> <p>In response to the above consideration of comments, RF notes that the legacy language places the responsibility for satisfying the obligations of the data specification using “mutually agreeable” means on the specification recipient.</p> <p>RF reinforces that the TOP (R1) and BA (R2) should not be responsible for ensuring its data specification is mutually agreeable to every specification recipient (potentially 100s of receiving entities). The "mutually agreeable" language should be removed from the proposed TOP-003-6 R1 and R2 subparts regarding data formats, security protocols, and conflict resolution processes. It is unclear how mutually agreeable formats, security protocols, and conflict resolution processes could be included in a data specification prior to it being distributed to the entities responsible for responding. As currently drafted, demonstrating criteria within a specification are mutually agreeable would require the creator of the specification to maintain evidence that each of the many recipients of the specification accepts each “mutually agreeable” criteria.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your support. The SDT is not proposing to make any changes and believes that most data and information is already being communicated via the existing specifications under IRO-010 and TOP-003 today. The SDT believes that locating and documenting the mutually agreeable formats and methods for securely transferring data and information in the data specification helps to provide clarity both for existing recipients of the specification and new entities as well. The format and security of the data an information must typically be addressed to allow for the provision of this information and is typically already agreed to and in place today. The mutually agreeable conflict resolution process is similarly required today just not documented in the specification. This process will help to alleviate conflicts between what is requested in Requirements R1.5.1, R1.5.2 and R1.5.3 by the requestor and concerns raised by the providers (e.g., infeasibility of meeting the periodicity or deadlines) of the data and information.</p>	



**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 quesiton #3.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Nicolas Turcotte - Hydro-Quebec (HQ) - 1**

**Answer**

**Document Name**

**Comment**

R1 and R2 Low VRF in VSL Table: “The TOP/BA did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.

Suggest for TOP-003-6 R1 adds similar language: “Performance criteria for the availability and accuracy of data and information, as applicable.” (for TOPs)

Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT made changes to the VSL table where appropriate. The SDT believes any additional administrative burden will provide both providing clarity of expectations and removal of a zero defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.

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

**Answer**

**Document Name**

**Comment**

EEI continues to have concerns with the proposed changes made to TOP-003-6 and question whether the proposed changes provide any discernible reliability benefit over the currently effective Reliability Standard. However, we offer the following edits to address our concerns with the current draft:

Requirement R1.

Part 1.1: The data and information should be specifically directed to “NERC registered entities” not entities “responsible for responding”. Entities who are not registered by NERC have no regulatory obligation to respond to data and information requests. Additionally, the identified NERC registered entity can only provide requested data and information that is under that entity’s direct control and access. To address these concern, the following suggested edits in bold are provided below:

A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, **if under the control and access of the identified NERC registered entity**, external network data and information, and identification of the **NERC registered** entity for responding to the specification as deemed necessary by the Transmission Operator.

Part 1.5: The methods identified should all be mutually agreed to, not just those in the subparts of Part 1.5.

Subpart 1.5.2: EEI does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary. Applying

performance criteria to the delivery of data and information expands the administrative burden on entities creating a zero defect requirement that this project was intended to correct.

Measure M1: EEI suggests the following additional language to M1 (see bold text):

Each Transmission Operator shall make available its dated, current, in force documented specification for data and information **that conform to mutually agreed to methods, criteria, formats and secure transfer of data and information by the entities identified in Part 1.1.**

Requirement R2

Part 2.1: The data and information should be specifically directed to “NERC registered entities” not entities responsible for responding. Entities who are not registered by NERC have no regulatory obligation to respond to data and information requests. Additionally, the identified NERC registered entity can only provide requested data and information that is under that entity’s direct control and access. To address these concern, the following suggested edits in bold are provided below:

A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, **if under the control and access of the identified NERC registered entity**, external network data and information, and identification of the **NERC registered** entity for responding to the specification as deemed necessary by the Transmission Operator.

Part 2.5: The methods identified should all be mutually agreed to, not just those in the subparts of Part 1.5.

Subpart 1.5.2: EEI does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 2.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary. Applying performance criteria to the delivery of data and information expands the administrative burden on entities creating a zero defect requirement that this project was intended to correct.

Measure M2: EEI suggests the following additional language to M2 (see bold text):

Each Transmission Operator shall make available its dated, current, in force documented specification for data and information **that conform to mutually agreed to methods, criteria, formats and secure transfer of data and information by the entities identified in Part 2.1.**

Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comments. The SDT decided against specifying NERC registered entities since this will be inconsistent with other reliability standards. Section A 4 1 identifies the NERC functional entities. The SDT believes the mutually agreeable process for resolving conflicts in Requirement R1.4 will facilitate resolution of any conflicts. Regarding language 1.5, this process for resolution in conflict would address any issues of infeasible request of data and information. Therefore, the SDT is not proposing to make these changes to Requirement R1.5.</p>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Texas RE noticed the Effective Date section on both TOP-003-5 and IRO-010-5 need to be updated to reflect the implementation plan for Project 2021-06.</p> <p>Texas RE noticed the applicability section is formatted inconsistently with other standards, which show:</p> <p>4. Applicability</p> <p>4.1 Functional Entities</p> <p>4.1.1 [Functional Entity #1]</p> <p>4.1.2 [Functional Entity #2]</p> <p>If the SDT elects to make this change, Texas RE recommends Requirement Part 1.5 state: “Methods for the <i>functional</i> entity identified in Part 1.1 to provide the data and information that includes, but is not limited to:”</p> <p>In requirement Part 1.5.5 and Requirement 2 Part 2.55, “methods” should be singular</p>	

Texas RE noticed the implementation plan contains a consideration for “developing provisions for using intermediary entities to provide data”. Texas RE recommends the requirement language reflect this idea as this regularly occurs in the ERCOT region with information from the TOP to the BA. Texas RE recommends the following language:

*2.6 Provisions for the identification of any data and information where the responsible respondent identified in Part 1.1 will utilize an intermediary party to pass through the data and information unaltered from the responsible entities to the Transmission Operator.*

SDT may consider minor changes in R5 for consistency:

**R5.** Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a *data specification for data and information* in Requirement R3 or R4 shall satisfy the obligations of the documented specifications. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*

In order to be consistent throughout the entire standard document, Texas RE recommends Section C Compliance section be revised to remove use of “data” where included in “data specification” (in the last three paragraphs of Section C 1.2) to be consistent with proposed Requirement language changes in Requirements R2 and R3.

In the Evidence Retention Section for IRO-010-5 Requirement, Texas RE suggests capitalizing Compliance Audit or saying simply audit in the third and fourth paragraphs as in the first paragraph.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT made grammatical and inconsistency changes where appropriate. The SDT did not reinsert the usage of "intermediary entities" as commenters in previous drafts were not supportive and stated that entities could manage such situations outside of a NERC Reliability Standard requirement.

**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

**Answer**

**Document Name**

**Comment**

1. R1 and R2 Low VRF in VSL Table: “The TOP/BA did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.

Suggest for TOP-003-6 R1 adds similar language: “Performance criteria for the availability and accuracy of data and information, as applicable.” (for TOPs)

Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The SDT accepts your suggested change to the VSL table and it will be reconciled for the final ballot. The SDT believes any additional administrative burden will provide both clarity of expectations and removal of a zero defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

1.5.5. and 2.5.5 have grammatical errors with the use of “A” (singular) and “methods” (plural). How it is corrected may change the interpretation.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The grammar in Requirement 1.5.5 has been corrected.

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

**Answer**

**Document Name**

**Comment**

Similar to the comment above, WECC generally supports the proposed revisions, but has concern with the language in Parts 1.4. and 2.4. Since this requirement is applicable to the TOP (1.4) and BA (2.4), but requires a "mutually agreeable process," the TOP or BA could have difficulty complying if the other identified entities will not agree to a process.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Casey Perry - PNM Resources - 1,3 - WECC,Texas RE**

**Answer**

**Document Name**

**Comment**

PNM agrees with and supports EEI's comments related to TOP-003-6.

Likes 0

Dislikes 0

**Response**

Thank you for your response. Please see response to EEI's comment.

**Daniel Gacek - Exelon - 1**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response. Please see response to EEI's comment.	
<b>Kinte Whitehead - Exelon - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response. Please see response to EEI's comment.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	



Ameren recommends section 1.5.1 to read "Mutually agreeable deadlines or periodicity in which data and information is to be provided;". Also, we believe, the proposed wording in section 1.5.5 is plurally incorrect. Ameren also recommends section 2.5.1 to read "Mutually agreeable deadlines or periodicity in which data and information is to be provided;". Also, the proposed wording in section 2.5.5 is plurally incorrect.

Likes	0
Dislikes	0

**Response**

Thank you for your support. For Section 1.5.1/2.5.1, the SDT considers requirement R1.4 and R2.4 to address any need to resolve conflicts including any disagreements on deadlines or periodicity and is not proposing to modify the requirement as suggested. The SDT recognizes that the identification of deadlines or periodicity is best determined by the requestor who is responsible for the reliability tasks for which the data and information is needed. The grammar in Requirement 1.5.5 and Requirement 2.5.5, and the associated measures have been corrected.

**Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer**

**Answer**

**Document Name**

**Comment**

Minnesota Power agrees with EEI's comments.

Likes	0
Dislikes	0

**Response**

Thank you for your response. Please see response to EEI's comment.

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

**Answer**

**Document Name**

**Comment**

We suggest the Purpose statement in section A.3 be phrased as follows – *“To ensure that the Transmission Operator and Balancing Authority have the data and information **they** need to plan, monitor, and assess the operation of **their** Transmission Operator Area **and** Balancing Authority Area, **respectively.**”*

We believe the Project reference in section A.5 should be updated to “Project 2021-06”, rather than “Project 2019-06”.

For R1/Part 1.1, we suggest the added phrase “and identification of the entity responsible for responding to the specification” be changed to “and identification of the **entities** responsible for responding to the specification”.

For R1/Part 1.5, we suggest some minor edits and re-ordering:

*1.5. Methods **and criteria** for the **entities** identified in Part 1.1 to provide data and information that includes, but is not limited to:*

*1.5.1 A mutually agreeable method(s) for securely transferring data and information;*

*1.5.2 A mutually agreeable format **for the data and information**;*

*1.5.3 Specific deadlines or periodicity in which data and information is to be provided;*

*1.5.4 Provisions to update or correct data and information, as applicable or necessary; and,*

*1.5.5 Performance criteria for the availability and accuracy of data and information, as applicable.*

For R2/Part 2.1, we suggest the added phrase “and identification of the entity responsible for responding to the specification” be changed to “and identification of the **entities** responsible for responding to the specification”.

For R2/Part 2.5, we suggest some minor edits and re-ordering:

*2.5. Methods **and criteria** for the **entities** identified in Part 1.1 to provide data and information that includes, but is not limited to:*

*2.5.1 A mutually agreeable method(s) for securely transferring data and information;*

- 2.5.2 A mutually agreeable format **for the data and information**;
- 2.5.3 Specific deadlines or periodicity in which data and information is to be provided;
- 2.5.4 Provisions to update or correct data and information, as applicable or necessary; and,
- 2.5.5 Performance criteria for the availability and accuracy of data and information, as applicable.

Likes 0

Dislikes 0

**Response**

Thank you for your support. The SDT made structural, grammatical or errata non-substantive changes as necessary.

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**Answer**

**Document Name**

**Comment**

OPG supports NPCC Regional Standards Committee’s comments.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Kimberly Turco - Constellation - 6**

**Answer**

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**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**

Thank you for your support.

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010\_TOP-003**

**Answer**

**Document Name**

**Comment**

No comment	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
It is not clear how broadening the scope of the standard from a data specification which is clear, to an overly broad data and information specification adds clarity. It would be more beneficial if the standard covered clear requirements for a data specification that supported Operation Planning Analysis, Real-time monitoring and Real-time Assessment criteria. Information should be clearly defined.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support. The SDT is not proposing any substantive changes and believes the current language is not overly broad but sufficient to achieve the stated purpose of the standard.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

MPC supports MRO NERC Standards Review Forum comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your support.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>R1 and R2 Low VRF in VSL Table: “The TOP/BA did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.</p> <p>Suggest for TOP-003-6 R1 adds similar language: “Performance criteria for the availability and accuracy of data and information, as applicable.” (for TOPs)</p> <p>Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. The SDT accepts your suggested change to the VSL table and it will be reconciled for the final ballot. The SDT believes any additional administrative burden will provide both clarity of expectations and removal of a zero defect policy for the providers of the data and information as well as provide adequate accuracy and availability to meet the needs of the requestor.</p>	

<b>4. Provide any additional comments for the SDT to consider, if desired.</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Project 2022-04 updates CIP-012 by adding “availability” per FERC Order 886. We request that updates to IRO-010 and TOP-003’s respond to this FERC Order, if they do not already respond. Another alternative is coordination between the two SDTs.</p> <p>Please consider that adding new requirements to IRO-010-5 and TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens, which was not the intent of this project.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your support. While the SDT acknowledges that there is potential for some overlap between the standards proposed by this committee and CIP-012-2 with regards to the availability of Real-time Assessment and real-time monitoring data, CIP-012 does not include Operational Planning Analysis or balancing authority analysis in its applicability and is not redundant. It is possible that a CIP-012 violation could result in a failure to meet the performance criteria set forth in a required data specification and potential violations for both TOP-003-6 and IRO-010-5. This situation is not unique to these standards and violations should be evaluated on a case-by-case basis by the ERO in its enforcement.</p>	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

MPC supports MRO NERC Standards Review Forum comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>An item that is missing is identifying who is accountable for receiving and distributing data in accordance with a data specification submitted by an entity. There should be a consistent approach on how a Transmission Operator receives external data and information needed to support its Operational Planning Analyses, Real-time monitoring and Real-time Assessments. Either the BA or RC should be accountable for distribution of data required for a TOP to perform its operational planning analysis, Real-time monitoring and Real-time Assessments so that it is consistent between all entities. The purpose of these two standards is to ensure that all entities have the data they need to perform their functions. Consistency should be considered as well as clear requirements and limits instead of broad definitions.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. The SDT drafted revisions in a manner that retains flexibility for applicable entities to utilize available technologies, integrate new technologies, and to define expectations for data and information exchange. This allows entities to continue to receive the data and information they believe is necessary to perform its functions and promote reliability.	



**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010\_TOP-003**

**Answer**

**Document Name**

**Comment**

No comment

Likes 0

Dislikes 0

**Response**

Thank you for your 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**

Thank you for your comment.

**Kimberly Turco - Constellation - 6**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Constantin Chitescu - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
OPG supports NPCC Regional Standards Committee's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
<b>Answer</b>	
<b>Document Name</b>	

**Comment**

No additional comments.

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer**

**Answer**

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response**

Thank you for your comments.

**Bret Galbraith - Seminole Electric Cooperative, Inc. - 6**

**Answer**

**Document Name**

**Comment**

Seminole requests:

(1) The Standard Drafting Team to elaborate more on Operational Planning Analysis, Real-time Assessments, Real-time monitoring, and Balancing Authority analysis functions within the technical rationale so that entities can make sure they are capturing all proper analyses.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

**Answer**

**Document Name**

**Comment**

No additional comments

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

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

**Answer**

**Document Name**

**Comment**

We believe the updates made in this draft revision are in line with the SAR and clarify the requirements surrounding data specifications. Furthermore, we believe this revision provides needed clarity to the Violation Severity Levels by aligning them with the revised requirement language.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**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**

**Document Name**

**Comment**

Tacoma Power supports MRO NSRF's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comments.

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

The primary purpose of the SAR is to simplify administrative burdens, reduce zero-defect expectations and limit unnecessary data retention requirements that do not contribute to BES reliability and resiliency. While the MRO NSRF commends the efforts by the SDT, there are no meaningful updates to the standards which achieve those goals in the new drafts. The nominal changes in language, or relocation of legacy language, doesn't achieve the overarching objectives of the SAR. Without such deliberate updates, consider maintaining the status quo of the current versions of the standards and cancelling the project in its current form. If the SDT elects to proceed, consider the additional comments:

The MRO NSRF still has concerns with the addition of the performance criteria of 'availability' within TOP-003 requirements 1.5.2, 2.5.2 and IRO-010 1.5.2 that without appropriate bounding language or allowances for unavailability (equipment/component failure, maintenance, et cetera). A data requestor may request 100% availability (allowable via the technical rationales), which would then create a 'zero defect' requirement.

Additionally, within the same requirements, MRO NSRF has similar concerns with the performance criteria of 'accuracy' without associated bounding language clearly describing its scope. Without clarification, the interpretation of the term 'accuracy' could vary widely between REs and/or Registered Entities, fostering incongruities in CMEP monitoring activities. For example, 'accuracy' as currently stated could refer either to the comprehensiveness of the overall data set or the precision of each individual data point, but the administrative burden for each is very different.

The MRO NSRF continues to see overlapping areas within the new drafts (IRO-010-5/TOP-003-6 1.5.2 and 1.5.5, TOP-003-6 2.5.2 and 2.5.5) and CIP-012-1 as well as Project 2020-04. Secure data transfer resides within CIP-012 and incorporating it into IRO-010-5 and TOP-003-6 continues to raise the risk of double jeopardy between those standards and CIP-012 in cases of Real Time Monitoring and Real Time Assessment data. The SDT should also coordinate with the Project 2020-04 SDT to ensure no conflicted interpretation of the term "availability" is likely to arise.

MRO NSRF recommends the removal of IRO-010-5 1.4 and TOP-003-5 1.4 and 2.4, as it is unnecessary and too broad. The term "resolving conflicts" could relate to a host of issues outside of the intention of the SDT. The new draft standards already contain provisions to update and correct data and information via 1.5.2 and 2.5.2. The SDT's white paper also used these as an example of the use of the conflict resolution process, making the publication of an additional conflict resolution process unnecessary. Such a requirement, as described in the Technical Rationales, increases the administrative burden of these standards, rather than lessening. To the extent that two entities require conflict resolution, that can and is done outside of a compliance requirement.

While “mutually agreeable” appears occasionally throughout the NERC Reliability Standards and is a generally understood term, the SDT’s White Paper interpretation of its use within the context of IRO-010-5 and TOP-003-6 increases the administrative burden, compliance responsibility, and data retention requirements related to these standards if documentation regarding collaboration with each entity must be maintained. Mutually Agreeable (page 10 of white paper): The repeated use of the term “mutual agreed upon” is intentional to facilitate collaboration between requestors and respondents in preparing the data specification to ensure the specification is feasible, reasonable, and sufficient. The retention of the word mutual for these requirements suggests that a data specification should be developed collaboratively, to address issues and concerns around the provision and protection of content of the respondent data can be addressed in the specification itself. As such, the MRO NSRF recommends the SDT clarify what administrative or evidence burden is intended by that term within the technical rationale.

Likes 1	Wike Jennie On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry
Dislikes 0	

**Response**

Thank you for your support. While the SDT acknowledges that there is potential for some overlap between the standards proposed by this committee and CIP-012-2 with regards to the availability of Real-time Assessment and real-time monitoring data, CIP-012 does not include Operational Planning Analysis or balancing authority analysis in its applicability and is not redundant. It is possible that a CIP-012 violation could result in a failure to meet the performance criteria set forth in a required data specification and potential violations for both TOP-003-6 and IRO-010-5. This situation is not unique to these standards and violations should be evaluated on a case-by-case basis by the ERO in its enforcement.

**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

Answer	
Document Name	

**Comment**

In the previous draft, the SDT agreed with many of our points in regards to inconsistencies with respect to IRO-010 R1 and R2 (low VRF) and R3 (medium VRF) as well as the VSL levels for elements 1.1 through 1.4 and indicated that these would be addressed in Draft 2. We would appreciate any clarifications as to why they seem not to have been addressed.

To adjust to the current draft and to correct an error in the comment, we re-iterate here our comments from the last draft.

Despite FERC having accepted 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 for example) 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. Per the VRF and VSL justification document, this inconsistency does not respect Guideline 2.

A similar inconsistency is present for the proposed VSL. As proposed, the VSL for R3 attributes a lower VSL to any single violation of elements 1.1 through 1.4. Meanwhile, a failure to identify a single information per 1.1, 1.2 or 1.3 does not trigger the VSL for R1 which requires that at least two sub-requirements must be violated to qualify for VSL-low.

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-low 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, a single identification violation of R1.1, R1.2 or R1.3 should be “lower”. Or, the VSL text for R3 should be aligned with the VSL text of R1.

That said, the way R1.5 is written now, a failure to identify in R1.1, R1.2 and R1.3 may perhaps generally trigger a failure to correctly identify an associated administrative communication through in R1.5, thereby triggering a two-element failure and thus a VSL-moderate violation for a failure to identify. In the same way, the failure to communicate per R3 an information specified in R1.1 will likely also be a failure to respect the administrative communication means specified in R1.5, also “promoting” the VSL by one level.

Likes	0	
Dislikes	0	

**Response**



The SDT reviewed the historical record for implementation of IRO-010 and determined that the VRF levels for both R1 and R3 were approved by FERC in 2015 in Docket #RM15-16-000. The SDT has decided to keep the VRF levels as currently in place.

**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1**

**Answer**

**Document Name**

**Comment**

We believe the updates made in this draft revision are in line with the SAR and clarify the requirements surrounding data specifications. Furthermore, we believe this revision provides needed clarity to the Violation Severity Levels by aligning them with the revised requirement language.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**Nicolas Turcotte - Hydro-Quebec (HQ) - 1**

**Answer**

**Document Name**

**Comment**

In the previous draft, the SDT agreed with many of our points in regards to inconsistencies with respect to IRO-010 R1 and R2 (low VRF) and R3 (medium VRF) as well as the VSL levels for elements 1.1 through 1.4 and indicated that these would be addressed in Draft 2. We would appreciate any clarifications as to why they seem not to have been addressed.

To adjust to the current draft and to correct an error in the comment, we re-iterate here our comments from the last draft.

Despite FERC having accepted 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 for example) 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. Per the VRF and VSL justification document, this inconsistency does not respect Guideline 2.

A similar inconsistency is present for the proposed VSL. As proposed, the VSL for R3 attributes a lower VSL to any single violation of elements 1.1 through 1.4. Meanwhile, a failure to identify a single information per 1.1, 1.2 or 1.3 does not trigger the VSL for R1 which requires that at least two sub-requirements must be violated to qualify for VSL-low.

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-low 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, a single identification violation of R1.1, R1.2 or R1.3 should be “lower”. Or, the VSL text for R3 should be aligned with the VSL text of R1.

That said, the way R1.5 is written now, a failure to identify in R1.1, R1.2 and R1.3 may perhaps generally trigger a failure to correctly identify an associated administrative communication through in R1.5, thereby triggering a two-element failure and thus a VSL-moderate violation for a failure to identify. In the same way, the failure to communicate per R3 an information specified in R1.1 will likely also be a failure to respect the administrative communication means specified in R1.5, also “promoting” the VSL by one level.

Likes	0
Dislikes	0

**Response**

Thank you for your comment. The SDT reviewed the historical record for implementation of IRO-010 and determined that the VRF levels for both R1 and R3 were approved by FERC in 2015 in Docket #RM15-16-000. The SDT decided to keep the VRF levels as currently in place.

**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 MRO NSRF for quesiton #4.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies**

**Answer**

**Document Name**

**Comment**

RF thanks the Standard Drafting Team for its consideration of Draft 1 comments and appreciates the opportunity to comment the proposed Draft 2 standard revisions.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

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

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Ruchi Shah - AES - AES Corporation - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No additional comments here.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

Portland General Electric Company does not believe the proposed changes to IRO-010 and TOP-003 provide meaningful improvement on the currently enforceable version of these standards. Given the number of other Standard Development projects responsible entities are currently responding to, IRO-010 and TOP-003 should not be modified at this time.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**Diana Torres - Imperial Irrigation District - 6**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

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

**Answer**

**Document Name**

**Comment**

None.

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF</b>	
Answer	
Document Name	
<b>Comment</b>	
The NAGF has no additional comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF</b>	
Answer	
Document Name	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your comment.	
<b>Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Southern Company does not have any further comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
BPA appreciates the SDT's explanation that they tried to focus on process. However, process over results is an ineffective way to ensure reliability.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Donald Lock - Talen Generation, LLC - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No additional comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	



While outside the scope of the current SAR, AECL agrees that TOP-003 R1.3 and its subparts as well as IRO-010-3 R1.3 and its subparts be retired once the recent obligations associated with Project 2021-07 (Extreme Cold Weather) have become enforceable.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. While the SDT agrees that the subparts in TOP-003, IRO-010 and EOP-012 have overlap, EOP-012 is applicable only to the GO/GOP in preparation for extreme cold weather. Those subparts in TOP-003 and IRO-010 allow for the RC, TOP and BA to utilize that data as part of their Operational Planning Analysis, Real-time monitoring, Real-time Assessments and BA analysis functions.

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

**Answer**

**Document Name**

**Comment**

AZPS does not have any additional comments for the SDT at this time.

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer**

**Document Name**

**Comment**

No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>While outside the scope of the current SAR, AEP once again recommends 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. The most recent revisions in Project 2021-07 were developed in the spirit that the standard be flexible and that its obligations be less prescriptive in nature. We believe this same approach should also be taken for TOP-003 in Project 2021-06 as well.</p>	
Likes 1	Associated Electric Cooperative, Inc., 3, Bennett Todd
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. While the SDT agrees that the subparts in TOP-003, IRO-010 and EOP-012 have overlap, EOP-012 is applicable only to the GO/GOP in preparation for extreme cold weather. The subparts in TOP-003 and IRO-010 allow for the RC, TOP and BA to utilize that data as part of their Operational Planning Analysis, Real-time monitoring, Real-time Assessments and BA analysis functions.</p>	
<b>Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD Voters</b>	
<b>Answer</b>	
<b>Document Name</b>	

## Comment

No Comments

Likes 0

Dislikes 0

## Response

Thank you for your response.

**End of Report**