



NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

Coordinate Operations Standard Drafting Team

October 16–17, 2003
Chicago, Illinois

Draft Meeting Minutes

Attendance

Steve McCoy—Chairman, CAISO
Narinder Saini, Entergy
Darrel Richardson, Illinois Power
John Norden, ISO-NE
Norb Mizwicki, MAIN
Al DiCaprio, PJM
Don Gold, BPA

Jason Shaver, ATCLLC
Gary Campbell, MAIN
Peter Brandien, Northeast Utilities
Al Miller, IMO
Maureen Long, NERC
Barry Gee, National Grid
Larry Kezele, NERC

Summary of Discussions

1. Chairman McCoy reviewed the agenda.
2. The Coordinate Operations Standards Drafting Team (COSDT) approved the meeting minutes from the August 11–12, 2003 meeting.
3. The COSDT discussed the August 14, 2003 power outage from the perspective of the potential ramifications of that outage on Reliability Authority to Reliability Authority communications and the Coordinate Operations Standard. The COSDT noted that coordination is essential during system restoration. The COSDT also noted the importance of the periodic conference calls currently taking place between various Reliability Coordinators within the Eastern Interconnection.
4. Chairman McCoy led the team through a thorough discussion and re-write of each of the 5 requirements and measures drafted during the first and second COSDT meetings. The COSDT decided to eliminate requirement 5 (Reliability Analysis) because its sub-requirements are captured in either Requirement 2 (Notifications and Data Exchange) or Requirement 3 (Coordination). The current working draft of the Coordinate Operations Standard, dated October 17, 2003, is attached as **Exhibit A**.
5. Gary Campbell, Norb Mizwicki (MAIN's Compliance Monitor), and Chairman McCoy led the team on a brief discussion of the Compliance Monitoring Process, the Levels of Non-Compliance, and the Sanctions sections of the standard. The COSDT developed a Levels of Non-Compliance subsection for the Procedures Requirement.

6. Chairman McCoy provided a status report of recent NAESB WEQ activities related to the development of business practices to support the NERC reliability standards. He also provided an overview of the NAESB Wholesale Electric Quadrant organization (see **Exhibit B**). Narinder Saini is a member of NAESB's Coordinate Operations business practices task force. Larry Kezele stated that he has been asked to be the NERC staff liaison to the NAESB Operate Within Limits business practices task force.

Action Items

1. Chairman McCoy will develop Levels of Non-Compliance tables to support each of the remaining 3 requirements and measures.

Next Meeting

The next meeting of the COSDT will be December 4 (8 a.m.–5 p.m.) and December 5 (8 a.m.–3 p.m.) in San Francisco, California. The purpose of this meeting is to finalize the draft standard and complete edits to a comment form that will be posted with the draft standard.

Procedures**1. Requirements**

- 1.1. The RA shall develop and share Operating Procedures, Processes or Plans that include other reliability area(s).
- 1.2. The RA shall distribute each of those Operating Procedures, Processes or Plans to those RAs that are referenced in these documents.
- 1.3. The RA shall follow its documented update methodology

2. Measures

- 2.1. The RA shall have evidence that each Operating Procedure, Process or that includes another RA exists and was distributed to all referenced RAs. (Example of Evidence: E-mail transmittal notice, a copy of a memo or other documentation).
- 2.2. The RA shall have a document change control procedure that includes provisions for the following:
 - 2.2.1. Review cycle at least once every three years, regardless of whether changes have been actively identified.
 - 2.2.2. Notice to recipients that there were changes to the documents.
 - 2.2.3. Summary or identification of changes made to the document.
 - 2.2.4. Version control and archival.
- 2.3. The RA shall have evidence that its Procedures, Processes or plans (that include other RAs) have been updated in accordance with the documented update methodology

3. Regional Differences

None identified.

4. Compliance Monitoring Process

- 4.1. The reliability authority shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The reliability authority shall keep documentation for rolling 12 months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The reliability authority shall have the following available upon the request of its compliance monitor:
 - 4.3.1. Evidence that each of its operating procedures that includes other RAs has been distributed to each RA referenced in that procedure
 - 4.3.2. A document change control procedure that shall includes provisions for the following:
 - 4.3.2.1. Review cycle at least once every three years, regardless of whether changes have been actively identified.
 - 4.3.2.2. Notice to recipients that there were changes to the documents.

4.1 and 4.2 were copied from the work we did on the Notification requirement

- 4.3.2.3. Summary or identification of changes made to the document.
- 4.3.2.4. Version control and archival.
- 4.3.3. Evidence that its Procedures, Processes or Plans were updated in accordance with the RA's documented update methodology.
- 4.3.4. The compliance monitor shall interview (can be by email or other source) other RAs to verify that they received the documents

5. Levels of Non-compliance

- 5.1. Level One: No Change control process
- 5.2. Level Two: Operating Procedures, Processes or Plans developed but not updated in accordance with change control process.

or

Operating Procedures, Processes or Plans not distributed to those RAs that are referenced in these documents.
- 5.3. Level Three: Not applicable
- 5.4. Level Four: No Operating Procedures, Processes or Plans developed

6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

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Notifications and Data Exchange

1. Requirement

- 1.1. The RA shall participate in daily regional or sub-regional conference calls or other communication forums to exchange information with other RAs relative to real-time or short-term interconnection reliability. (The Regions shall establish a time for these calls that recognizes some RAs may wish to participate in more than one of these calls.)
- 1.2. The RA shall follow its process or procedure in notifying other RAs of conditions in its RA Area.
- 1.3. The RA shall follow its process or procedure in providing requested data and information to other RAs – this is limited to data and information needed to support reliability assessments.

2. Measures

- 2.1. The RA shall have evidence that it has prepared for and participated in its daily call
- 2.2. The RA shall have a documented process or procedure that defines the conditions under which it will notify other RAs; the process it will follow in making those notifications; and the data and information it will exchange. This process or procedure shall be mutually agreeable to the involved RAs. The RA shall have an operating log or other data source that documents it has followed its process or procedure for notifying other RAs of specific conditions in its RA Area.
- 2.3. No complaints were filed with the RA that data wasn't provided as requested.

3. Regional Differences

None Identified

4. Compliance Monitoring

- 4.1. The reliability authority shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The reliability authority shall keep documentation for rolling 12 months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The reliability authority shall have the following available upon the request of its compliance monitor:
 - 4.3.1. Agreed upon processes or procedures
 - 4.3.2. Evidence it followed the agreed upon processes
 - 4.3.3. Evidence of any tests conducted
- 4.4. When questioned, other RAs confirm that they were notified in accordance with the process or procedure and that data was provided as agreed upon.

5. Levels of Non-compliance

- 5.1. Level one: Process documented, but not followed or tested
- 5.2. Level two: No documented process.
- 5.3. Level three: Not applicable
- 5.4. Level four: Not applicable

6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

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Coordination

1. Requirement

- 1.1. The RA that identifies a potential, expected, or actual problem that adversely impacts another RA or the Interconnection shall contact other RAs to discuss options and decide upon a solution to prevent or resolve the identified problem.
 - 1.1.1. The RAs involved shall document and implement the selected solution.
 - 1.1.2. If an agreed upon solution cannot be reached, each RA shall take actions in its own Reliability Area to preserve Interconnection reliability.

2. Measures

- 2.1. For events where an RA has contacted one or more other RA(s) for assistance in resolving a potential, expected or actual problem that adversely impacts the interconnection and the RAs were able to agree to a solution:
 - 2.1.1. The RAs involved shall have documentation for the event (operations log or other data source) including date and time, RA(s) involved in discussion, description of the condition or problem, solution identified, actions taken and other comments relevant to the condition.
- 2.2. For events where an RA has contacted one or more other RA(s) for assistance in resolving a potential, expected or actual problem that adversely impacts the interconnection and the RAs were not able to agree on a solution:
 - 2.2.1. The RAs involved shall have documentation for the event(operations log or other data source) including date and time, RA(s) involved in discussion, description of the condition or problem, notice that no solution was agreeable to all involved RAs, actions taken and other comments relevant to the condition.

3. Regional Differences

None identified.

4. Compliance Monitoring Process

- 4.1. The RA shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint (complaints must be filed within 90 days of incident), or triggered by a system disturbance or abnormal operating condition, to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The RA shall keep operations logs, or other data sources for 12 rolling months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The RA shall have the following available upon the request of its compliance monitor:
 - 4.3.1. Operations logs or other data sources with the date and time other RAs were contacted for assistance in solving a problem, description of the problem that led to the notification, actions taken or directives issued to alleviate the problem (if applicable) , and other comments relevant to the condition.

5. Levels of Non-compliance

5.1. **Level one:**

5.2. **Level two:**

5.3. **Level three:**

5.4. **Level four:**

6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

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Outages

1. Requirement

- 1.1. The RA shall identify to other RA's through applicable agreements or procedures, those facilities (generation, transmission, and protection outages etc) that are impactful to the reliability of their system.
 - 1.1.1. If an RA identifies a system configuration or outage condition that was not recognized in the development of the impactful list, but is thought to be impactful to the reliability of another RA, the RA shall identify this configuration to the impacted RA.
- 1.2. The RA shall have a mutually agreeable process for sharing its outage information associated with the facilities identified in 1 above with its impacted RAs.
- 1.3. The RA shall follow its process for sharing its outage data with other RAs.

2. Measures

- 2.1. The RA shall have:
 - 2.1.1. An agreed upon list of its facilities that are impactful to other RAs within its interconnection
 - 2.1.2. An agreed upon list of other RAs' facilities that are impactful to its reliability area
- 2.2. The RA shall have a mutually agreeable documented process for sharing its outage data with other RAs.
- 2.3. The RAs shall have evidence that its process for sharing its outage information as agreed upon.

3. Regional Differences

None identified.

4. Compliance Monitoring Process

- 4.1. The RA shall demonstrate compliance through self-certification submitted to its compliance monitor annually. The compliance monitor may also use scheduled on-site reviews every three years, and investigations upon complaint to assess performance.
- 4.2. The performance-reset period shall be one calendar year. The RA shall keep operations logs, or other data sources for 12 rolling months. The compliance monitor shall not keep audited data once the audit has been completed.
- 4.3. The reliability authority shall have the following available upon the request of its compliance monitor:
 - 4.3.1. An agreed upon list of its facilities that are impactful to other RAs within its interconnection
 - 4.3.2. An agreed upon list of other RAs' facilities that are impactful to its reliability area
 - 4.3.3. A mutually agreeable documented process for sharing its planned outage data with other RAs
 - 4.3.4. Evidence that its process for sharing its outage information as agreed upon.

4.1 and 4.2 were copied from the work we did on the Notification requirement

- 4.4. When questioned, other RAs within the interconnection shall confirm that they received outage data as agreed upon

5. Levels of Non-compliance

- 5.1. **Level one: Process documented, but not followed or tested**
- 5.2. **Level two: No documented process.**
- 5.3. **Level three: Not applicable**
- 5.4. **Level four: Not applicable**

6. Sanctions

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Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions.

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