Unofficial Comment Form

Project 2014-03 Revisions to TOP/IRO Reliability Standards

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=ee0297bc3228459e8440fb7dd3148c1b) to submit comments on the definition. The electronic comment form must be completed by **March 24, 2014**.

All documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2014-03-Revisions-to-TOP-and-IRO-Standards.aspx). If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

## Background Information - Project 2014-03 Revisions to TOP/IRO Reliability Standards

On April 16, 2013, NERC submitted two petitions requesting Commission approval of TOP and IRO standards. One petition addressed three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards. The second petition addresses four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards.

On November 21, 2013, the Commission issued a NOPR in response to these petitions. The NOPR announced the Commission’s intent to remand the proposed TOP and IRO Standards. In the NOPR, the Commission raises a concern that NERC “has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.” For example, the Commission cites the fact that the proposed TOP Standards do not require Transmission Operators to plan and operate within all System Operating Limits (“SOLs”), which is a requirement in the currently effective standards.

On December 20, 2013, NERC filed a motion requesting that the Commission defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR. This deferral would provide an opportunity for the industry, NERC, and FERC to work toward a common understanding and afford time to review the proposed TOP and IRO Standards through the NERC standards development process to ensure that a technically justified set of solutions is in place for reliability.

As explained in the motion, NERC will hold two technical conferences (one in the East and one in the West) to identify and assess concerns regarding the TOP and IRO Standards identified n the NOPR, such as the monitoring of SOLs, unknown operating states, and outage coordination. Concurrently, NERC will work with the Standards Committee to re-formulate a standard drafting team to begin development work on revisions to the proposed standards, which would be informed by the technical conferences.

Additionally, in response to the concerns noted by the Commission in the NOPR on the development of a minimum set of analytical tools (analysis and monitoring capabilities) to ensure that Reliability Coordinators and Transmission Operators have the tools it needs to perform its functions, NERC will continue development of Reliability Standards that address Real-Time Tools as they relate to the proposed TOP and IRO standards, which could either continue to be included as part of Project 2009-02, Real-time Monitoring and Analysis Capabilities, or in revisions to the proposed TOP and IRO standards.

Links to the relevant files and project pages are included here for reference:

[[NERC Petition on TOP Standards](http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final_TOP_Filing_20130416_complete.pdf)]

[[NERC Petition on IRO Standards](http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final_IRO_Filing_20130416_complete.pdf)]

[[FERC NOPR](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/NOPR_TOP_IRO_RM13-12_RM13-14_RM13-15_20131121.pdf)]

[[NERC Motion to Defer Action](http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final_Final_Motion_to_Defer_Action_20131220%20%281%29.pdf)]

 [[Project 2009-02 Real-time Monitoring and Analysis Capabilities project page](http://www.nerc.com/pa/Stand/Pages/Project-2009-02-Real-time-Reliability-Monitoring-and-Analysis-Capabilities.aspx)]

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. Do you agree with the scope and contents of the SAR? If not, please provide specific comments and suggestions for SDT consideration.

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any regional variances associated with approved NERC Reliability Standards that will be needed as a result of this project? If yes, please identify the Regional Variance.

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.

[ ]  Yes

[ ]  No

Comments:

1. Are there any other concerns with this SAR?

[ ]  Yes

[ ]  No

Comments: