

**Individual or group. (34 Responses)**  
**Name (20 Responses)**  
**Organization (20 Responses)**  
**Group Name (14 Responses)**  
**Lead Contact (14 Responses)**  
**Question 1 (31 Responses)**  
**Question 1 Comments (34 Responses)**  
**Question 2 (29 Responses)**  
**Question 2 Comments (34 Responses)**  
**Question 3 (31 Responses)**  
**Question 3 Comments (34 Responses)**  
**Question 4 (32 Responses)**  
**Question 4 Comments (34 Responses)**

Individual
Dan Rochester
Independent Electricity System Operator
Yes
We applaud the SDT of its positive response to our previous comments regarding the lack of monitoring of and requirement to operate within SOLs. Although the revisions do not go all the way to ensuring operating within all SOLs, and mitigating exceedances as they occur, the revised standard goes a long way in meeting that general intent. We agree with all the changes to the Time Horizons, Measures, data retention and compliance elements (VRFs and VSLs).
Yes
Again, we applaud the SDT of its positive response to our previous comments regarding the lack of consideration to SOLs in operational planning. Although the revisions do not go all the way to ensuring TOPs plan their operations to respect all SOLs, the revised standard goes a long way in meeting that general intent. We agree with all the changes to the Time Horizons, Measures, data retention and compliance elements (VRFs and VSLs).
No
M5: The last sentence added is in fact a requirement. Measures should not include requirement for "completeness" of the data provision, which is already implicit in R5. The extent to which the data is not fully provided should be assessed and reflected by the VSLs. Suggest to delete this sentence and as desired, expand the VSLs for R5 to make them graded according to the percentage of data not provided.
There will be no change to reliability
Our assessment that there should be no change to reliability is made on the assumption that the SOLs identified as a result of the Operational Planning Analysis by the Transmission Operator as supporting its local area reliability can ensure that all the existing SOLs that are being monitored and observed (for non-exceedance) by TOPs are identified through this process. Failure to identify any such SOLs will expose the system to unreliable operation.
Individual
Joylyn Faust
Consumers Energy
No
R2 is ambiguous, must a BA inform its TO of an inability to perform a directive after the directive has been issued or at anytime its systems are down and it has temporarily lost its ability to perform some function. R12-14 appear to provide the TO with omnipotent information rights which may include the ability to create monitoring requirements of other entities and control over maintenance schedules of other entities telemetry and associated facilities. Furthermore reciprocal data rights are not provided.
No
The proposed standard which indicates the TO shall "notify" reliability entities as to "their role" appears to be bolstering the authority of the TO. During real time events the TO should have authority to issue directives, however on a planned basis TOs should coordinate, not dictate the role of the entities. On a planned basis, input from the involved entities will result in a more reliable system.
No

Poorly worded. According to the proposed standard the TO is supposed to “exchange” data, at its discretion, regarding equipment ratings at voltage levels below the BES. So when our TO demands HVD equipment ratings, what are we to exchange it with? Again, this standard appears to be bolstering the authority of the TO. If the TO can demand information from the DP, then the DP should have access to similar information regarding the TO’s system.

There will be an adverse impact to reliability

See previous responses.

Individual

John Fish

TransCanada

No

M4. "The evidence shall be that there are no Transmission Operators as identified in Requirement R2 or Balancing Authorities as identified in Requirement R3 with outstanding requests for data to the subject entity that have been unfulfilled." Should be removed The response to the "request for data", or an attestation that no requests have been made, should stand alone as proof of GO/GOP compliance??

There will be no change to reliability

Group

Northeast Power Coordinating Council

Guy Zito

Yes

In R9, to clarify the requirement to operate below a System Operating Limit (SOL), “outside” should be replaced with the wording “at or above”.

Yes

Yes

There will be no change to reliability

No change to reliability assumes that the SOLs identified as a result of the Operational Planning Analysis by the Transmission Operator as supporting its local area reliability can ensure that all the existing SOLs that are being monitored and observed (for non-exceedance) by TOPs are identified through this process. Failure to identify any such SOLs will make the system vulnerable to unreliable operation.

Individual

Jonathan Appelbaum

The United Illuminating Copany

No

“Operational Planning Analysis” is not a defined term in the NERC Glossary and a proposed definition is not included in the Draft Standard. TOP-001 and TOP-002 have capitalized the term indicating a definition. TOP-002 information box says “by definition Operational Planning Analysis includes Contingency Analysis.” TOP-001 R12 and R13 were added in this posting to address Order 693 paragraph 1660 and 1661 direction to include the minimum capabilities that are necessary to enable operators to deal with real-time situations and to ensure reliable operation of the Bulk-Power System. The drafting team utilizes the phrase “shall monitor, or shall have access to information about, conditions and Facilities..” By offering an alternative to “monitor” the drafting team is implying there is a difference between “monitor” and “having access to information”. UI suggests retaining “monitor” and removing “access to information about” because the TOP needs the minimum capability of monitoring the Facilities in its area to perform its reliability functions.

Yes

“Operational Planning Analysis” is not a defined term in the NERC Glossary and a proposed definition is not included in the Draft Standard. TOP-001 and TOP-002 have capitalized the term indicating a definition. TOP-002 information box says “by definition Operational Planning Analysis includes Contingency Analysis.”

Yes

There will be no change to reliability

The team has rationalized the existing Standards and Requirements
Individual
Kasia Mihalchuk
Manitoba Hydro
Yes
Yes
Yes
There will be no change to reliability
Individual
Jon Kapitz
Xcel Energy
No
R3. Each Transmission Operator shall inform its Reliability Coordinator and all other Transmission Operators that are known or expected to be affected of actual and anticipated Emergencies based on its assessment of its Operational Planning Analysis. Xcel Energy has concerns about the use of the term “affected”. This can be widely interpreted by the entity and compliance enforcement authority. We suggest that language limit the entity’s obligation to Adjacent entities and the Reliability Coordinator. The RC should be held responsible for making this assessment from a regional perspective and make notifications to other entities as it is required to or deems necessary. R13. Each Transmission Operator shall monitor, or shall have access to information about, conditions and Facilities identified in its Operational Planning Analysis within any Transmission Operator Area. Xcel Energy has concerns as to whether this requirement indicates that a TOP must have monitoring capability for other TOP areas. This requirement should encompass only a TOP’s own area. R14. Each Transmission Operator shall provide approval rights for planned maintenance of its monitoring and analysis capabilities to its System Operators. Xcel Energy believes this requirement should be worded so that it covers only monitoring capabilities for its own area, and items that it is in control of. (e.g. not feeds from other entities that input into a TOPs own monitoring capability) M11 through M14 list incorrect associated requirements. This appears to be a mapping issue.
No
R2. Each Transmission Operator shall plan to preclude operating in excess of those Interconnection Reliability Operating Limits (IROLs) and each SOL which, while not an IROL, has been identified by the Transmission Operator as supporting its local area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1. Xcel Energy believes this requirement is confusing as written. It appears to want to include all SOLs. If so, why not just state as such? It could be simply stated as “...IROLS and SOLS...” R3. Each Transmission Operator shall notify all reliability entities identified in the plan(s) cited in Requirement R2 as to their role in those plan(s). Xcel Energy believes this should be limited to just entities within the TOP’s own area.
Yes
There will be no change to reliability
Individual
Howard Rulf
We Energies
No
R7: What does it mean to be “outside” an IROL? Vague. R8: Since any SOL is to “ensure operation within acceptable reliability criteria” this requirement requires that the TOP inform the RC of all SOLs. How can the Time Horizon be Real-Time Operations? Operational Planning Analysis is done at least day ahead? R9: What does it mean to be “outside” an SOL? Vague. R10: How do I correlate “within limits” to “inside/outside”?
No
Rationale for Requirement R1: Operational Planning Analysis does not include Contingency analysis “by definition”. “Contingency analysis” does not appear in the definition of Operational Planning Analysis. R2: Since any SOL is to “ensure operation within acceptable reliability criteria” this requirement requires that the TOP include all SOLs in their “plan”. R3: When is this notification to take place? Since this analysis starts taking place as much as 12 months in

advance, as the plan changes over time there could be multiple conflicting notifications.
No
TOP-003-2 R1: Nowhere in NERC Standards is a TOP or BA required to perform an Operational Planning Analysis. This requirement applies to data specifications. It does not require Operational Planning Analysis. R1.2: Who mutually agrees to the format? The TOP and BA? A TOP or BA may have scores of different entities with Facilities within their boundaries. Is this requiring data format agreements with scores of other entities? The TOP and BA should be allowed to specify the data format. R4: Please explain what is meant by "satisfy the obligations of the documented specifications for data". Please rephrase this to something more clearly understandable in the requirement. R5: Consider modifying this requirement so that the data is provided directly where possible. Data received indirectly through other entities is delayed, and there are increased chances of problems in receiving the data.
Individual
RoLynda Shumpert
South Carolina Electric and Gas
No
In R3 the language should be "...be affected by actual..." and not "...be affected of actual..." Measures M10-M14 are off by 1 in pointing back to their respective requirements (i.e. M10 is pointing back to R9, etc). It appears that there are a number of instances in the Implementation Plan where the 'Resolution' points to the incorrect requirement in the proposed standard. Many times it is off by 1 requirement.
No
In "Consideration of Comments on First Draft of Revised TOP Standards Real-Time Operations - Project 2007-03," p77, #6 response, March 26, 2009, it was stated that "reliability entities" is not a defined term. In addition, in "Consideration of Comments on Second Draft of Standards for Real-Time Operations (Project 2007-03)," pp 64-65, August 25, 2009, a response is given to Xcel Energy's comment that the phrase reliability entities needs definition that "reliability entities are the entities certified by NERC as such." SCE&G believes that it is unclear what is meant by "certified by NERC as such" and would appreciate that these entities be spelled out as it relates to these Standards. It appears that there are a number of instances in the Implementation Plan where the 'Resolution' points to the incorrect requirement in the proposed standard. Many times it is off by 1 requirement.
No
It appears that there are a number of instances in the Implementation Plan where the 'Resolution' points to the incorrect requirement in the proposed standard. Many times it is off by 1 requirement.
Reliability will be improved
It appears that there are a number of instances in the Implementation Plan where the 'Resolution' points to the incorrect requirement in the proposed standard. Many times it is off by 1 requirement.
Individual
Greg Rowland
Duke Energy
No
<ul style="list-style-type: none"> <li>• What does the drafting team mean by "its inability" in R2 to perform a Reliability Directive? There clearly needs to be a distinct difference between the reasons in R1 and "inability" in R2. Duke wants to eliminate the possibility of double jeopardy for an entity to be assessed a possible violation for non-compliance to one action with it stated similarly in two requirements.</li> <li>• R3 typo – change the word "of" to "by".</li> <li>• R8 – the phrase "supporting its local area reliability" is unclear. Replace it with the phrase "having an Adverse Reliability Impact". This adds clarity and also recognizes that local area problems that don't rise to the level of Adverse Reliability Impact should not be treated as SOLs required to be reported to the RC under this standard.</li> <li>• R9 – insert the phrase "as having an Adverse Reliability Impact" after the phrase "Requirement R8", making R9 consistent with R8.</li> <li>• R13 – strike the phrase "shall monitor, or". The TOP doesn't need to directly monitor facilities in other TOP areas.</li> <li>• M1 – strike the word "either" and replace the phrase "or, (b) informed the Transmission Operator that" with the word "unless". This makes M1 consistent with the R1 revision above.</li> <li>• M3 typo – replace the word "of" with the word "by".</li> <li>• M5 typo – the word "operations" appears twice. Need to strike the first one.</li> <li>• M8 – replace the phrase "supporting its local area reliability" with the phrase "having an Adverse Reliability Impact", consistent with the R8 revision above.</li> <li>• M13 – strike the phrase "can monitor, or" consistent with the R13 revision above.</li> <li>• R1 VSL – replace the phrase "and the respective entity did not inform the Transmission Operator that such action would" with the phrase "and compliance with the Reliability Directive would not", consistent with the R1 revision above.</li> <li>• VSLs for R3, R5, R6 and R8 – The mixing of numbers with percentages and the phrase "whichever is less" in these VSLs is confusing. For example, if under R5 there are four affected entities, and the TOP does not coordinate operations with one of the four, then that is one</li> </ul>

entity, or 25% of the total. What does "whichever is less" mean? Is that a Lower or Severe violation? Conversely, if there is only one affected entity and the TOP does not coordinate operations with that entity, then that is one entity or 100% of the total. Is that a Lower or Severe violation? • R8 VSLs – In each VSL, replace the phrase "supporting its local area reliability" with the phrase "having an Adverse Reliability Impact, consistent with the R8 revision above. • R13 VSL – Strike the phrase "monitor, or", consistent with the R13 revision above.

No

• R2, M2 and R2 VSL – Replace the phrase "supporting its local area reliability" with the phrase "having an Adverse Reliability Impact". This adds clarity regarding which SOLs must be addressed in the TOP's plan. • R3 VSL - The mixing of numbers with percentages and the phrase "whichever is less" in these VSLs is confusing. For example, if there are four affected entities, and the TOP does not notify one of the four, then that is one entity, or 25% of the total. What does "whichever is less" mean? Is that a Lower or Severe violation? Conversely, if there is only one affected entity and the TOP does not notify that entity, then that is one entity or 100% of the total. Is that a Lower or Severe violation?

No

• R2 and R3 VSLs - The mixing of numbers with percentages and the phrase "whichever is less" in these VSLs is confusing. For example, if there are four entities, and the TOP or BA does not distribute its data specification to one of the four, then that is one entity, or 25% of the total. What does "whichever is less" mean? Is that a Lower or Severe violation? Conversely, if there is only one entity and the TOP does not notify that entity, then that is one entity or 100% of the total. Is that a Lower or Severe violation?

There will be no change to reliability

These revised standards (including our proposed changes), provide more clarity and will improve compliance documentation, but we don't view that as a reliability improvement. Redline Posting for TOP-001-2 has a slight different definition than the Implementation Plan for Project 2007-03: Real-Time Operations Reliability Directive - A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency. Reliability Directive - A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency. Duke prefers the first definition. It is the one based on the definition of "Emergency" since it doesn't mention "actual or expected".

Group

Public Service Enterprise Group Companies

Kenneth D. Brown

No

In R1 the word "identified" was added as an adjective to describe "Reliability Directive." While this is a step in the right direction, it needs further clarification. The requirement should be further modified to indicate that the Transmission Operator must identify. i.e., state that "this is Reliability Directive" to ensure that the entities that must comply with this requirement know that what is being communicated by the TOP is a Reliability Directive and not some other less urgent communication.

No

The Rational to R1 should add language to clarify that in some circumstances the failure or unavailability of the usual tools may result in the inability to perform a complete and comprehensive analysis. Therefore the words "to the extent practicable" should be added (see below) in the last sentence after the word "able." Rationale for Requirement R1: By definition, Operational Planning Analysis includes Contingency analysis. By stating this Requirement in this manner, the SDT is stating that a Transmission Operator must have analysis tools or procedures to perform the Operational Planning Analysis (or has contracted the service). Since the Requirement does not mandate how the analysis is completed, if tools are used, the Transmission Operator must be able to the extent practicable to complete the analysis even if those tools are not available.

Yes

Reliability will be improved

Group

E.ON U.S.

Brent.Ingebrigtsen@eon-us.com

No

E.ON U.S. suggests that in the definition of directive the adjective "mandated" should be added and placed in front of "action."

Yes
Yes
There will be no change to reliability
Group
Midwest ISO Standards Collaborators
Marie Knox
No
Requirement #1 Comments can not be developed for this requirement until we are able to see a final draft of the definition of Reliability Directive. It will have a significant impact on this requirement. Requirement #9 SOL's have not been defined clearly enough to require an identified time limit for exceedance. These durations could be set by the Transmission Owners or Operators based on the type of equipment, not dictated in the standard. Requirement #10 It is not clear when the RC should be informed, before, during or after actions have been taken to correct an overload. This needs to be discussed. Depending on the urgency of the situation, it may not be appropriate for the TOP to inform the RC prior to taking actions. It should simply be a requirement for the TOP to log or record actions taken for future review. Requirement #13 It is not clear what TOP area needs to be monitored. Language needs to be added to clearly state that a TOP should have access to information on other TOP areas that could impact the local area.
Yes
Yes
There will be no change to reliability
Individual
Michael Lombardi
Northeast Utilities
No
Both Requirements R12 and R13 are considered vague and open to interpretation. For example, what type of information is to be monitored and what is meant by conditions? Language needs to be added to clearly state what a TOP needs to accomplish pursuant with these requirements. Various Measures appear to have incorrect Requirement references. For example, the text of Measure M14 refers to Requirement R13. Please verify / correct the Requirement references for all Measures. The term "Operational Planning Analysis", is capitalized to identify it as a defined term yet the NERC Glossary of Terms (updated 4/20/2010) indicates that the term has not been FERC approved. NU is concerned that the terms Operational Planning and Operational Planning Analysis are not FERC approved and may not be consistently applied throughout the industry. Suggest these terms be reviewed as part of this standard to ensure industry consensus on these terms and subsequently seek FERC approval, as required.
No
The rationale box for Requirement R1, indicates that TOP must be able to complete analysis even if the tools that are used are not available. It is not clear how contingency analysis would be performed if study tools are not available. What if day ahead study tools are part of an Energy Management System (EMS) which is a high reliability redundant system with an independent system at a back up facility? Is the rational box verbiage suggesting one would need to postulate the loss of a redundant EMS as well as its back up facility? Please clarify what is to be accomplished pursuant with R1. The term "Operational Planning Analysis", is capitalized to identify it as a defined term yet the NERC Glossary of Terms (updated 4/20/2010) indicates that the term has not been FERC approved. (See additional write up in Question 1 comment)
Yes
Reliability will be improved
Group
Bonneville Power Administration
Denise Koehn
No

R5 - should refer to adjacent Transmission Operators. R8 - This daily documentation is burdensome. Reporting "all" SOL's to RC ahead of time as part of daily assessment in addition to the daily planned outage heads-up reporting. Suggest clarifying SOL as intended to be path loading limits and/or local area transmission service support limits, (the BES is a big system with lots of ratings, it can also mean voltage limits in addition to line and path limits). If there is a significant change to a limit, that would be important. R10 – Prefer having the RC call the TOP in 5 Minutes to ensure entity is aware of and acting on a limit excursion , rather than TOP interrupt system response to call RC to tell them the Operator is mitigating a SOL violation which is already a NERC TOP standard to take immediate action. There's a typo in M12, M13, M14 when it refers to the wrong requirement due to renumbering R11 instead of R12, R12 vs R13, R13 vs R14).

No

R2 Although an entity does not plan to operate above the SOL, a contingency may cause an short SOL excursion until planned mitigation action is completed within the Tv (allowable violation time limit). Non-electrical people could get confused by this distinction. Suggest clarifying SOL as intended to be path loading limits and/or local area transmission service support limits, (the BES is a big system with lots of ratings, it can also mean voltage limits in addition to line and path limits).

Yes

There will be no change to reliability

Group

PacifiCorp

Sandra Shaffer

Yes

Yes

Yes

Reliability will be improved

The proposed standards will improve reliability because the new standards provide a much more clear and streamlined approach than in the already approved standards. This will also enable responsible entities to focus their time on compliance with standards that improve reliability rather than be concerned with compliance with poorly written or redundant standards.

Group

SERC OC Standards Review Group

Mike Hardy

No

In R2, it appears that an entity might be faced with double jeopardy if it fails to notify the entity issuing the directive. Doesn't R1 also include this same requirement? In R3, the phrase "affected of actual" should be "affected by actual". In R8 and M8, what is the meaning of "local area reliability" and could that mean all SOLs? We believe the team intended to have a definite subset of SOLs. Perhaps the word "supporting" could be replaced by the phrase "necessary for". In R12 and R13, it doesn't seem possible to measure "monitoring". These also seem like requirements that are ideally suited for the certification process. It appears that the numbering of the requirements within each measure may have gotten out of synch due to a cut and paste insert. In M8, SOLs should be singular. The data retention periods are too long and do not appear to serve the purpose of improving reliability. Specifically, the three (3) year retention period for SOL and IROL violations is two (2) years too long.

No

In R2 and M2, what is the meaning of "local area reliability" and could that mean all SOLs? We believe the team intended to have a definite subset of SOLs. Perhaps the word "supporting" could be replaced by the phrase "necessary for".

No

We believe that R5 is redundant to R4 if the Transmission Operator is added to R4.

Reliability will be improved

"The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its

board or its officers.”
Individual
Leland McMillan
NorthWestern Energy
Yes
NorthWestern Energy appreciates this chance to comment. NorthWestern supports the definition of "Reliability Directive" as indicated in the Definitions section. R13 could be clarified to specify the exact types of information about conditions and facilities identified that the entity must have access to. Also, NorthWestern seeks clarification as to why the requirement mandates that the TOP shall have this information "within any Transmission Operator Area"? Perhaps the intent of the requirement is geared towards TOPs obtaining operating information pertaining to their own TOP area, regardless of which TOP area it is actually physically located in? NorthWestern requests that the drafting team consider flexibility in the implementation timelines of this standard. Compliance with this standard might require Transmission Operators to acquire/arrange for Operational Analysis and planning simulation tools not currently required by any FERC approved standards.
Yes
Yes
Reliability will be improved
Group
Southern Company Transmission
JT Wood
No
Southern's comments: Suggest modifying R3 language for additional clarity. Suggested alternatives might be "Each Transmission Operator shall inform its Reliability Coordinator of actual and anticipated Emergencies based on its assessment of its Operational Planning Analysis, and shall likewise inform any other Transmission Operators that are known or expected to be affected by those Emergencies" or "Each Transmission Operator shall inform its Reliability Coordinator and all other expectedly affected Transmission Operators of actual and anticipated Emergencies based on its assessment of its Operational Planning Analysis." In the first sentence of M5, the first usage of the word "operations" is redundant and can be struck. In R8, it is unclear what should be the treatment of SOLs that develop due to unanticipated system conditions that are not included in the Operation Planning analysis (i.e., real time system conditions deteriorate due to several unplanned outages). In R11, need to add "...within 30 minutes" after SOL. R14 can be mis-read to mean that the Transmission Operator grants approvals of outages, as opposed to granting the authority to grant approval to the System Operator. Also, it would be useful to clarify if the TOP still has the authority to also veto planned outages, in addition to the System Operator having that authority. M11 – M14 have references to incorrect Requirement numbers. In M8 and M14, the word "its" was incorrectly modified to "it's." SERC's comments: Southern participated in developing these comments and support them In R2, it appears that an entity might be faced with double jeopardy if it fails to notify the entity issuing the directive. Doesn't R1 also include this same requirement? In R3, the phrase "affected of actual" should be "affected by actual". In R8 and M8, what is the meaning of "local area reliability" and could that mean all SOLs? We believe the team intended to have a definite subset of SOLs. Perhaps the word "supporting" could be replaced by the phrase "necessary for". In R12 and R13, it doesn't seem possible to measure "monitoring". These also seem like requirements that are ideally suited for the certification process. It appears that the numbering of the requirements within each measure may have gotten out of synch due to a cut and paste insert. In M8, SOLs should be singular. The data retention periods are too long and do not appear to serve the purpose of improving reliability. Specifically, the three (3) year retention period for SOL and IROL violations is two (2) years too long.
No
Southern's comments: The current NERC Glossary definition of Operations Planning Analysis does not explicitly include contingency analysis. Unless the SDT is modifying the definition of Operations Planning Analysis to include contingency analysis, we recommend that R1 be re-expanded to include the expectation of performing contingency analysis. Regarding R2 and M2, a Top should not plan to operate beyond any SOL limit – regular or one that "is supporting local reliability." Otherwise, why should it be classified as an SOL? SERC's comments: Southern participated in developing these comments and support them In R2 and M2, what is the meaning of "local area reliability" and could that mean all SOLs? We believe the team intended to have a definite subset of SOLs. Perhaps the word "supporting" could be replaced by the phrase "necessary for".
No



Southern's comments: M4 and M5, there should be allowance for outstanding requests that are still within the deadline as defined in R1.4. SERC's comments: Southern participated in developing these comments and support them We believe that R5 is redundant to R4 if the Transmission Operator is added to R4.
Reliability will be improved
Southern's comments none SERC's comments: Southern participated in developing these comments and support them Although we feel that reliability will be improved, we cannot determine whether the language that was inserted specifically in response to order 693 is not arbitrary, capricious or otherwise deleterious to reliability.
Group
FirstEnergy
Sam Ciccone
No
We agree with many of the changes the drafting team made to this standard. However, we have the following comments and suggestions: a. With respect to R7 and R11 in relationship to IROLs, R11 is inherent in R7. If an entity is not permitted to operate outside an IROL limit for longer than its Tv, then it needs to implement whatever actions are required to comply with Tv including directing "others to act, to mitigate both the magnitude and duration of exceeding an IROL within the IROL's Tv." R9 and R11 have the same issue with respect to SOL's. M3 is silent on evidence related to the Operational Planning Analysis. Did the drafting team intend for this data to be available for inspection as a means of proving or disproving the affect on a Neighboring Transmission Operator and thereby the need to contact them? If it is the intent of the drafting team to use the Operational Planning Analysis as evidence, then it should be specifically stated in M3. If it is the intent of the drafting team for an entity to be able to prove "conditions did not permit such coordination" then that evidence should be specified in the measures. b. R11 – We believe that requiring the TOP to mitigate IROLs is outside their scope per the functional model. The RC holds the authority over the tools needed to mitigate an IROL and is the appropriate entity responsible for this requirement. Also, it seems as though this requirement is duplicative of IRO-009-1 R4 which states "When actual system conditions show that there is an instance of exceeding an IROL in its Reliability Coordinator Area, the Reliability Coordinator shall, without delay, act or direct others to act to mitigate the magnitude and duration of the instance of exceeding that IROL within the IROL's Tv. (Violation Risk Factor: High ) (Time Horizon: Realtime Operations)". c. R13 – We suggest the team remove the phrase "within any Transmission Operator Area" from the requirement. We believe this phrase is not necessary and adds confusion. d. R14 – The original SAR charged with addressing Order 693 directive 1660 required the standards to identify the minimum monitoring and analysis capabilities. The new requirement R14 does not fully address these minimum capabilities and will leave the requirement ambiguous from a compliance and enforcement standpoint. We suggest the team fully address the directive and clarify the requirement. e. Measures M10 through M14 make reference to the wrong requirements.
Yes
Yes
We commend the drafting team for attempting to manage the evidence in a way that does not require the TOP to get evidence to prove an absence of an issue, however, the following statement needs clarification to remove the double negative verbiage, "The evidence shall be that there are no Transmission Operators or Balancing Authorities with outstanding requests for data to the subject responsible entity that have been unfilled." This statement might be improved by stating "The evidence shall be the Transmission Operators and Balancing Authorities requests have been met." This will allow the entity to show the requests received from other entities and the evidence that they filled those requests.
There will be no change to reliability
We commend the hard work of the drafting team, but find it difficult to determine if these changes will affect the reliability of the BES.
Individual
Richard Kafka
Pepco Holdings, Inc.
No
R6 requires coordination which leads to questions regard who is non-compliant. It would be more proper to require reporting and approval requirements. RCs already are required to coordinate with each other. R9 sets a 30 minute limit on all identified SOLs (as opposed to allowing different times). This would require all facilities to have the same time limits for ratings. That should be addressed in FAC-008.
Yes
Yes

Reliability will be improved
Group
Dominion
Louis Slade, Jr.
No
Agree with changes to most requirements and measures, but with exceptions as noted below: R2 – Is covered in R1. Do not agree with entity being subject to non-compliance for same shortcoming under 2 requirements. We suggest R2 be removed or that R1 and R2 be revised so that the requirement to inform the TOP not be included in both. R13 – Is the sentence meant imply that a TOP should monitor or have access to information/facilities in another TOP Area that could impact its TOP Area? If so, we believe the current draft language should be revised to improve clarity of intent. We suggest revising to read “Each Transmission Operator shall monitor, or shall have access to information about, conditions and Facilities identified in its Operational Planning Analysis within external Transmission Operator Area(s) as necessary to perform such analysis” M1/M2 – revise measures so that entity is not subject to non-compliance for failure to notify TOP twice, pursuant to changes in R1/R2. M8 – change SOLs to SOL. M13 – revise pursuant to R13.
Yes
No
It is not clear how the data provision obligations of BAs under requirement R4 are different from their obligations under R5. We therefore suggest that TOP be added to R4 and that R5 be removed.
Reliability will be improved
While the changes remove potential ambiguity from the reliability requirements, we believe that BAs, TOPs and RCs, in almost all circumstances, understand the roles they play to insure reliable grid operations. We believe these changes are predominately the result of an increased focus on compliance related activities (audit) and industry requests for clarity. We do agree that the change in R8 is an improvement as it will allow TOP and RC to focus on the limited set of SOLs that could have an adverse impact on the BES. Dominion would also like to make a general statement concerning the VSLs for all of these standards. We are unsure as to whether the correct threshold for Low, Moderate, High and Severe is correctly identified but have no basis for a denial or suggested change. We are curious as to how the various SDTs came up with these. In some draft standards, these thresholds seem to be developed around 25% quartiles, which makes it easier to accept the high and severe categories if you consider these equivalent to a pass/fail (D or F).
Group
MRO's NERC Standards Review Subcommittee
Carol Gerou
No
The proposed TOP-001-2 standard is a significant improvement, but there are still important items that need to be addressed including: Comments cannot be developed for this requirement until a final draft of the definition of Reliability Directive is presented as it will have a significant impact on TOP-001-2 and R1. When Reliability directive is defined, the definition of a Reliability Directive is too broad and should be limited to “Abnormal conditions that require operational actions to avoid instability, uncontrolled separation and cascading as defined in Section 215 of the Federal Power Act.” TOP-001-2-R9: SOL’s should not be part of the TOP-001-2 standard as there are not identified timeframes in the NERC standards today. However, if SOL’s must be included, a better subset must be defined excluding thermal limits with any time limits being clearly specified as a return time after the SOL limit was exceeded such as 30 minutes after exceeding the specified SOL limit. An example definition might be non-thermal SOL’s are those facilities limited below their maximum thermal capability as a proxy to maintain BES stability. TOP-001-2-R10: It isn’t clear when the RC should be informed, before, during, or after actions have been taken to correct an overload. Depending upon the urgency of the situation, it might not be important to notify the RC, therefore the requirement should be changed to the TOP should record actions taken for future review. For TOP-001-2-R6 replace “coordinate” with “notify the RC and negatively impacted adjacent interconnected NERC registered entities of” For TOP-001-2-R3, the words “and anticipated” needs to be dropped as an unmeasurable requirement. In TOP-001-2-R2 and R4, “expected to be affected” would include known. We asked the SDT to please strike known. The VSLs for R7 appear to assume that the sample set of SOLs that would be reported to the RC is a small number by using one, two, three and four in each successive VSL. What if the sample set is large (i.e. 1000 SOLs)? Should the VSLs be based on percentages? The measures for TOP-001-2-R5 and R8 need to be clear that these are event driven requirements and evidence is only required if an “event” has occurred. In R6, the word “telemetering” should be

capitalized as it is a defined term in the NERC Glossary. The terms "control equipment" and "associated communications channels" are not defined in the glossary at all. Recommend modifying the wording to ensure consistency between standards. R14 uses the term "monitoring and analysis capabilities". This term is not defined in the NERC Glossary. R13 implies that a TO's Operational Planning Analyses should be monitoring facilities external to its own operating area when they have no control or responsibility for said facilities. It is not a TO's responsibility to monitor regional system conditions; therefore this requirement should be removed. FERC Order 693, paragraphs 1660 and 1661 do not specifically mention any of the verbiage in requirements R12, R13, & R14; therefore the preceding statement should be considered.

No

The rationale box needs to be clarified. If the drafting team meant for entities to have a primary set of tools / procedures and backup set as well, please clarify that. "By definition, Operation Planning Analysis includes Contingency analysis" is not accurate. The definition in the Glossary of Terms mentions nothing of contingency analysis. It mentions known transmission and generation facility outages, but that has nothing to do with contingency analysis, which includes a study of unknown events to occur on current system conditions. Therefore, the requirement should read "Each Transmission Operator shall have an Operational Planning Analysis that incorporates potential single contingency events." Is "plan" in requirement R2 a noun or verb? It appears to read as if it is a verb, which implies no documented action would be necessary. If intended, it should read "Each Transmission Operator shall develop a plan...." This flows much better with what the intent of R2 is trying to say.

No

Remove "at the discretion of the Transmission Operator or Balancing Authority" in R1-1.1. The TO and BA are the entities creating the specification, which already implies that any needed parameters are at their discretion. Overall clarification seems necessary on this bullet as well (R1-1.1). Why specifically address equipment of voltage levels below BES levels? Does this exclude equipment rated 100 kV and above? Replace "Real-time monitoring" with "Real-time Assessment" as this is an actual term in the NERC Glossary of Terms. This would follow a similar format to the "Operational Planning Analyses".

There will be no change to reliability

There seems to be a general lack of consistency in the use and meaning of terms relating to remote measurement and remote control of the BES in the TOP, COM and PRC standards. A better glossary would ensure consistent verbiage between the standards groups. The glossary term "Telemetry" is confusingly similar to the one for "SCADA". It wrongfully includes remote control as part of the definition. We suggest it be removed from the glossary and this project.

Individual

Saurabh Saksena

National Grid

No

R13 states that - Each Transmission Operator shall monitor, or shall have access to information about, conditions and Facilities identified in its Operational Planning Analysis within any Transmission Operator Area. What does "Facilities" in R13 refer to? Is it any facilities that are included in the analysis or those that have the potential to cause violations? Suggest replacing "...Facilities identified in its Operational Planning Analysis" by text in R8 - "...identified by the Transmission Operator as supporting its local area reliability based on its assessment of its Operational Planning Analysis." TOP-001 R13 also says "...within any Transmission Operator Area...", Does the drafting team mean within that particular TOP's area? It would be more clear if it said "...within its area...". If they really do mean another TOP's area, that is unrealistic. It could imply that we need to have info for TOP in Florida. TOP-001 R8 & TOP-002 R2 - When referencing SOLs both say something like "SOLs which, while not IROLs, have been identified by the Transmission Operator as supporting its local area reliability...". National Grid suggests deleting "...which, while not IROLs...".

No, No

TOP-001 R8 & TOP-002 R2 - When referencing SOLs both say something like "SOLs which, while not IROLs, have been identified by the Transmission Operator as supporting its local area reliability...". National Grid suggests deleting "...which, while not IROLs...".

TOP-001 R8 & TOP-002 R2 - When referencing SOLs both say something like "SOLs which, while not IROLs, have been identified by the Transmission Operator as supporting its local area reliability...". National Grid suggests deleting "...which, while not IROLs...".

Yes

There will be no change to reliability

Group
PJM
Patrick Brown
No
There are several issues with Requirement 6: • The requirement assigns responsibility to 3 entities for one task. NERC standards are designed to clearly assign responsibility to provide a clear measurement and allocation of non-compliance. R 6 as worded requires “coordination” between and among each entity. • Coordination is not defined. Does coordination mean “informing” another party? Does it mean “directing a new solution”? Does it mean “asking permission” of a third party? • Who is non-compliant when two (or more) parties do not agree with a proposed solution? How many alternatives proposals must be considered? Suggest the requirement be rewritten as a series of independent requirements with sub-bullets to identify specific tasks. Example: Each TOP shall inform all affected reliability entities of planned outages of active real-time communications channels: • Interpersonal channels • Data exchange channels for any BES elements • elements involved in identified IROL computations • Asset direct-control devices (reactive control equipment,...) Each TOP shall inform all affected parties of alternative means to be used for the duration of the proposed outage. Each BA shall inform all affected reliability entities of planned outages of active real-time communications channels: • Interpersonal channels • Data exchange channels for any BES elements or elements involved in identified IROL computations • Asset direct-control devices (regulation control signals; resource dispatch equipment,...) Each GOP shall inform all affected reliability entities of planned outages of active real-time communications channels: • Interpersonal channels • Data exchange channels for any BES elements or elements involved in identified IROL computations • Asset direct-control devices Each reliability entity inform by the TOP in Rx.x, (or by the BA in Ry.y or by the GOP in Rz.z) shall acknowledge the receipt of the information provided in Rx.x (or in Ry.y or Rz.z) to the respective TOP (BA or GOP). Requirement #13 Delete the phrase “...within ANY Transmission Operator Area”. The phrase has the potential to add confusion rather than clarity to the requirement.
There will be no change to reliability
Individual
Randi Woodward
Minnesota Power
Minnesota Power does not have any comments at this time.
Minnesota Power does not have any comments at this time.
No
Minnesota Power has the following comments for the individual requirements of the proposed Standard TOP-003-2. Requirement 1 • The time horizon doesn’t appear to match the requirement. • The tasks required to accomplish the items listed in sub-requirements R1.1 – R1.4 also fall under the responsibility of a Reliability Coordinator, in addition to the Transmission Operator and Balancing Authority functions that are already listed in this Requirement. • The term “mutually agreeable format” is confusing and needs more definition to eliminate any confusion regarding who is required to agree on the format in sub-requirement 1.2. Requirement 4 • The way this Requirement is currently worded could leave the door open for disparate specifications. As currently written, Registered Entities are obligated to abide by all specifications regardless of feasibility or ability to implement. Minnesota Power requests more clarification regarding what is meant by “satisfy the obligations of the documented specifications for data.” Requirement 5 • The way this Requirement is currently written it could open the door for a liberal interpretation of the Requirement and could result in excessive data requests in the name of “Operational Planning Analysis and Real-time monitoring.” Minnesota Power suggests revising the Requirement to state that the requesting Transmission Operator and/or Balancing Authority must demonstrate a reliability need in its request for data.
Minnesota Power does not have any comments at this time.
Group
IRC Standards Review Committee
Ben Li
No
Requirement #1 Comments can not be developed for this requirement until we are able to see a final draft of the definition of Reliability Directive. It will have a significant impact on this requirement. Requirement #9 A 30-minute time limit has been identified in Requirement 9, but that may be an inappropriate time based upon the variability that exists with actual system operating limits. In the case of thermal limits, some may be 15 minutes others may be 4 hours for different facilities. The same facility may have a 4 hour loading limit, and a 2 hour limit at a higher magnitude, as well as, perhaps, a 30 minute limit at a higher magnitude vet. If the limits were allowed to only be set

at 30 minutes, how are longer limits incorporated? Of course it is imprudent to operate a facility at the magnitude corresponding to a four hour limit for greater than four hours. But how is that limit identified and communicated if the System Operating Limit must be mitigated within 30 minutes? Any such operating parameter will be recognized as an SOL, then requiring a 30 minute limit if Requirement 9 is left as is. Requirement 8 mandates that limits be set to support local area reliability. Operating a facility for five hours at its four hour limit is contrary to that requirement. Transmission Operators need SOLs to be described and communicated in terms of both magnitude and associated time, but that time need not be limited to 30 minutes. The duration and magnitude of the SOL should be set by the Transmission Owners or Operators based upon respecting the facility and equipment ratings as required by the FAC standards. Requirement 9 would better serve reliability to require SOLs (which are identified in Requirement 8) to be described in specific terms of both magnitude and associated time. If needed, a fallback position could be maintained that establishes 30 minutes as the default time limit if no other limit is specifically defined in the SOL. Requirement #13 It is not clear what TOP area needs to be monitored. Language needs to be added to clearly state that a TOP should have access to information on other TOP areas that could impact his local area.

Yes

No comment at this time. (The YES box was inadvertently checked, which we are unable to de-select)

Yes

No comment at this time. (The YES box was inadvertently checked, which we are unable to de-select)

There will be no change to reliability

Individual

Darryl Curtis

Oncor Electric Delivery

Yes

Reliability will be improved

Individual

Catherine Koch

Puget Sound Energy

No

R1 – The addition of the term “identified” does not completely answer the question of who needs to identify the communication as a Reliability Directive. Simply adding the term means that it might be interpreted to mean that that the entity receiving a communication from a Transmission Operator might need to identify the communication as a Reliability Directive from its content and context. The following formulation is more clear: “Each Balancing Authority ... shall comply with each Reliability Directive that its Transmission Operator issues and identifies as a Reliability Directive, ...” Given the importance of these requirements, clarity must not be sacrificed for brevity. R8 – The use of the phrase “have been identified” is unnecessary in this requirement. The Transmission Operator has an independent obligation to identify these SOLs under the FAC standards. In addition, the phrase “its local area reliability” is ambiguous. If the intent of this term is to address a certain set of SOLs that have more than a purely local effect, then the phrase should be modified to something like “regional reliability” or “that may affect its neighboring Transmission Operator Areas”. The requirement should read “Each Transmission Operator shall inform its Reliability Coordinator of all SOLs that, while not IROLs, support regional reliability based on its assessment of its Operational Planning Analysis” or “Each Transmission Operator shall inform its Reliability Coordinator of all SOLs that, while not IROLs, that may affect its neighboring Transmission Operator Areas based on its assessment of its Operational Planning Analysis.” M1 – To be consistent with the recommended revisions to R1, the measurement should be revised to read “Each Balancing Authority ... (a) complied with each Reliability Directive that its Transmission Operator issued and identified as a Reliability Directive, ...”. Additionally we suggest that the measures provide guidance of how to prove a Reliability Directive was not issued in order to be complete in demonstrating compliance with the requirement. This same suggestion rings through all the measures. M2 – This measurement duplicates a portion of M1.

No

R1/R2 – The side-bar indicates that Contingency analysis is included Operational Planning Analysis by definition. The definition of Operational Planning Analysis, however, does not discuss or even mention Contingency analysis. Recommend a revision to the definition of Operational Planning Analysis to clarify that such an analysis does include Contingency analysis. R2 – See comments regarding identified SOLs under requirement R8 of TOP-001-2 above.

No
R1 – As indicated in the first full row on page 5 of the document “Resolution of Issues Assigned to Real-time Operations SDT (Project 2007-03)”, FERC staff disagrees with the data specification approach. How does the SDT propose to deal with this disagreement? Given this disagreement and FERC’s current concerns with NERC’s standard approval process, what purpose does continuation of the current approach accomplish? R1.2 – The phrase “mutually agreeable format” may lead to disputes between the TOP and other entities subject to the TOP’s data specification. In the event that the entities cannot agree, the TOP’s reasonable requirements should trump. R1.4 - There should be language added that requires agreement to proposed deadline by the entity receiving the specification as there could be a need for programming work and it could be foreseen that the deadline indicated can not be reasonably met.
There will be no change to reliability
Individual
Terry Harbour
MidAmerican Energy
No
The proposed TOP-001-2 standard is a significant improvement, but there are still important items that need to be addressed including: Comments cannot be developed for this requirement until a final draft of the definition of Reliability Directive is presented as it will have a significant impact on TOP-001-2 and R1. When Reliability directive is defined, the definition of a Reliability Directive is too broad and should be limited to “Abnormal conditions that require operational actions to avoid instability, uncontrolled separation and cascading as defined in Section 215 of the Federal Power Act.” TOP-001-2-R9: SOL’s should not be part of the TOP-001-2 standard as there are not identified timeframes in the NERC standards today. However, if SOL’s must be included, a better subset must be defined excluding thermal limits with any time limits being clearly specified as a return time after the SOL limit was exceeded such as 30 minutes after exceeding the specified SOL limit. An example definition might be non-thermal SOL’s are those facilities limited below their maximum thermal capability as a proxy to maintain BES stability. Many times scheduled transmission outages coupled with weather (drought, wind front, heat wave, etc) and strong market moves can drive unexpected SOL exceedances where units and markets cannot move within 30 minutes to redispatch sufficient generation. Coupling SOLs with time frames and penalties will drive unforeseen market impacts. TOP-001-2-R10: It isn’t clear when the RC should be informed, before, during, or after actions have been taken to correct an overload. Depending upon the urgency of the situation, it might not be important to notify the RC, therefore the requirement should be changed to the TOP should record actions taken for future review. For TOP-001-2-R6 replace “coordinate” with “notify the RC and negatively impacted adjacent interconnected NERC registered entities of” For TOP-001-2-R3, the words “and anticipated” needs to be dropped as an unmeasurable requirement. In TOP-001-2-R2 and R4, “expected to be affected” would include known. We asked the SDT to please strike known. The VSLs for R7 appear to assume that the sample set of SOLs that would be reported to the RC is a small number by using one, two, three and four in each successive VSL. What if the sample set is large (i.e. 1000 SOLs)? Should the VSLs be based on percentages? The measures for TOP-001-2-R5 and R8 need to be clear that these are event driven requirements and evidence is only required if an “event” has occurred. In R6, the word “telemetry” should be capitalized as it is a defined term in the NERC Glossary. The terms “control equipment” and “associated communications channels” are not defined in the glossary at all. Recommend modifying the wording to ensure consistency between standards. R14 uses the term “monitoring and analysis capabilities”. This term is not defined in the NERC Glossary. R13 implies that a TO’s Operational Planning Analyses should be monitoring facilities external to its own operating area when they have no control or responsibility for said facilities. It is not a TO’s responsibility to monitor regional system conditions; therefore this requirement should be removed. FERC Order 693, paragraphs 1660 and 1661 do not specifically mention any of the verbiage in requirements R12, R13, & R14; therefore the preceding statement should be considered.
No
The rationale box needs to be clarified. If the drafting team meant for entities to have a primary set of tools / procedures and backup set as well, please clarify that. “By definition, Operation Planning Analysis includes Contingency analysis” is not accurate. The definition in the Glossary of Terms mentions nothing of contingency analysis. It mentions known transmission and generation facility outages, but that has nothing to do with contingency analysis, which includes a study of unknown events to occur on current system conditions. Therefore, the requirement should read “Each Transmission Operator shall have an Operational Planning Analysis that incorporates potential single contingency events.” Is “plan” in requirement R2 a noun or verb? It appears to read as if it is a verb, which implies no documented action would be necessary. If intended, it should read “Each Transmission Operator shall develop a plan...”
No
Remove “at the discretion of the Transmission Operator or Balancing Authority” in R1-1.1. The TO and BA are the

entities creating the specification, which already implies that any needed parameters are at their discretion. Overall clarification seems necessary on this bullet as well (R1-1.1). Why specifically address equipment of voltage levels below BES levels? Does this exclude equipment rated 100 kV and above? Replace "Real-time monitoring" with "Real-time Assessment" as this is an actual term in the NERC Glossary of Terms. This would follow a similar format to the "Operational Planning Analyses".

There will be no change to reliability

Depending upon how SOLs are implemented and enforced there could be a negative impact to system reliability as transmission outages are further restricted reducing long-term maintenance to maximize short term risks to penalties.

Individual

Jason Shaver

American Transmission Company

No

Requirements #1 & 2 ATC supports Requirements 1 and 2 if the definition of Reliability Directive, as provided in TOP-001-2, is not modified. Any change to the proposed definition of Reliability Directive will require us to reevaluate our position. Requirement #3 Issue 1: ATC is concerned with the wording of Requirement 3 because it blends real time Emergencies situations with issues or concerns that are identified in Operational Planning Analysis for next day, week, month or year. Definitions: "Emergency" and "Operational Planning Analysis": Emergency: "Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the BES" Operational Planning Analysis: "An analysis of the expected system condition for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generation outages, equipment limitations, etc.)." If an Emergency by definition requires automatic or immediate manual action then there would be few if ever a situation in which a next day study would require either automatic or immediate manual action. What reliability objective is the SDT attempting to achieve when combining these two distinct situations into one requirement? Because of this observation ATC believes that the language about anticipated Emergency and Operational Planning Analysis should be deleted. If the SDT does not believe that these deletions are necessary then we request that the SDT provide additional clarify for the phrase "anticipated Emergency". Supporting TOP Standard: TOP-002-3 addresses the need for a TOP to perform an Operational Planning Analysis and when appropriate to develop a plan based on those results. That plan must be communication to Registered Entities that have to perform an action. (See ATC's Comments to TOP-002) Because TOP addresses next day studies we believe that there is no need for this requirement to also cover Operational Planning Analysis. Clarifying questions: Does the Operational Planning Analysis have to be performed by the TOP itself? (Situation: Currently MISO does a next day study for its footprint. Could that qualify as an Operations Planning Analysis being performed, or does each TOP have to perform its own next day study.) Requirement 3: "... based on its assessment of its Operational Planning Analysis." Issue 2: When is notification required to take place? ATC believes that the primary responsibility of the system operator is to address the actual (real-time) Emergency and then when appropriate follow up with the RC and other TOP's. The only exception is when the TOP has to issue a Reliability Directive which would be issued in response to the situation. Requirement 5: ATC believes that the second sentence should be deleted because all it is attempting to do is provide examples. The first sentence provides enough clarity, so that the second sentence is not needed and may result in more confusion. Requirement 6: Issue 1: Who qualifies as an "affected entity"? If the entity is not registered with NERC how can NERC verify that coordination took place? Does this mean that a TOP, BA and GOP would have to contact customers if the planned outage could affect them? How affected does an entity have to be in order to trigger coordination? Measure 6 states that the TOP, BA and GOP must coordinated "among impacted reliability entities" but there does not exist a definition of "reliability entities". This standard should clearly set the expectations as to who does the TOP, BA and GOP have to coordinate with and not make the requirement so broad to allow questions about who was involved in the coordination. Issue 2: It is not clear as to when a planned outage of telemetering and control equipment and associated communication channels has to be coordinated. Requirement 7: ATC believes that the term "outside" is not clear and that the SDT should either define the term or use a more appropriate term. Suggested Modification: Modification to R7: "Each TOP shall not "exceed" an identified IROL..." Requirement 8: ATC raised a question on Requirement 3 asking if each TOP has to perform its own Operations Planning Analysis. Based on the answer to that question this requirement may need to be deleted. If an Operations Planning Analysis can be performed by the RC then there would be no need for the TOP to contact the RC about the results of their own study. We believe that Requirement 2 of TOP-002-3 covers Operational Planning Analysis so there is no need to have a duplicate requirement. ATC is unclear as to what this requirement is attempting to achieve. Is this requirement simply saying that the TOP has to share their system operating limits with the RC? If that is the case we believe that the requirement should be rewritten to provide that specific clarity. Suggested Modification: The TOP shall inform the RC of all BES System Operating Limits (SOLs) that support local area reliability. Requirement 9: Issue 1: The proposed requirement is too restrictive because it prevents the TOP from applying loss of life assumption on its equipment. We believe that entities should be able to determine when

exceeding equipment limits is appropriate based on the situation and equipment. Suggested Modification: - The TOP may exceed (real-time) a SOL for a continuous duration of 30 minutes. In addition we believe that the TOP should be allowed to use the IROL Tv concept to allow an SOL to be exceeded for a continuous duration of greater than 30 minutes if they notify the RC of the longer SOL Tv. Requirement 10: It is not clear as to when the notifications must take place. Would notifying the RC following the exceedance of the IROL or SOL be okay, or, must the TOP contact the RC prior to taking action in order to be compliant with this requirement? Requirement 12: ATC believes that this requirement is unnecessary because it is only saying that a TOP has to know what is going on with its system. In order to be compliant with the other requirements in this standard a TOP understands that by default they must monitor as appropriate its system. The challenge this requirement introduces is that it is so broad that demonstration of compliance is overly burdensome. In addition this requirement is unclear as to what and how often the TOP has to monitor, or have access to information to demonstrate compliance. Questions: If a TOP has a 4 second scan rate for EMS data and if a single data scan is missed or an error occurs at a single point does this mean that the TOP is non-compliant? If an entity uses information on a RC website about planned outages and for some time that system is unavailable for any length of time will the TOP be non-compliant because they don't have access to information? What does the requirement mean by the phrase "conditions and Facilities"? Does this mean that the ROP has to monitor breaker statuses, switch statuses, transformer temperatures, wind conditions and ambient temperatures? Proposed suggestion: ATC believes that this requirement should be deleted. Requirement 13: This requirement will reduce reliability because it will force TOP's to use the smallest base case model to perform its Operational Planning Analysis. We believe our statement is accurate because it requires the TOP to have an EMS model that matches the Operational Planning Analysis model. So if an entity performs off-line studies (non EMS studies) that use the Eastern interconnection then they must also monitor or have access to information for the Eastern Interconnection. Since access to all if information is highly unlike or unnecessary to gather the TOP will have to use the model contained in their EMS to perform Operational Planning Analysis. Although this may not necessary be a bad thing a TOP will loss the benefits of using the larger model to perform Operational Planning Analysis. If the RC performs the Operational Planning Analysis then by this requirement does the TOP have to monitor everything in the RC's Operational Planning Analysis model? Suggested Modification: ATC believes that this requirement should be deleted.

No

Rational Box: The SDT states that by definition Operational Planning Analysis includes Contingency Analysis. ATC does not agree with this statement and therefore we requests that the SDT removed this statement. Operation Planning Analysis: "An analysis of the expected system condition for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generation outages, equipment limitations, etc.)." The definition does not specifically call out contingency analysis but is specific that an Operations Planning Analysis is a next day study which can be performed any time from a day ahead to as much as 12 months ahead. Time Horizon: In TOP-001-2 Requirement 2 the SDT calls on Operations Planning Analysis to be performed and identifies it as either a Same-Day Operations, Real-Time Operations Time Horizon requirement. In TOP-002-3 Requirement 1 the SDT is calling for Operations Planning Analysis to be performed and identifies it as a Operations Planning Time Horizon. ATC finds it very confusing that the SDT is using this defined term in multiple Time Horizons and believes that a single time horizon be used for this term. Requirement 1: If a TOP were to perform an Operations Planning Analysis for TOP-001-2 then what different Operations Planning Analysis would a TOP have to do be in compliance with Requirement 1 of TOP-002-3? Requirement 2: ATC believes that Requirement 2 (TOP-002-3) conflicts with TOP-001-2 Requirement 9. Requirement 9 in TOP-001-2 allows a TOP to exceed an SOL for a continuous duration of 30 minutes but that same allowance is not provided in requirement 2. (Note: see ATC's comment to Question 1 requirement 9.) ATC believes that the same continuous duration time provided in Requirement 9 of TOP-001-2 be allowed in Requirement 2. Requirement 3: ATC believes that additional clarity is needed around the use of the term "role". We believe that this requirement is calling for TOP's to contact other Registered Entities if they have an "action" to perform in the plan. Is ATC's understanding of the term "role" consistent with the SDT's understanding? ATC also believes that the phrase "reliability entities" should be replaced with Registered Entities.

No

Requirement 1.1: ATC believes that requirement 1.1 is unnecessary and opens up other issues and therefore should be deleted from this standard. Long-term outage information while important is not directly related to EMS data. In addition, information about facilities that operate below 100 kV is beyond FPA 215 and is beyond NERC's jurisdiction.

There will be an adverse impact to reliability

Operational Planning Analysis: ATC is concerned with the use of the term Operational Planning Analysis in both TOP-001 and TOP-002. Once something is called an Operational Planning Analysis all associated requirements apply. Although the SDT is attempting to draw a distinction between contingency analysis which typically runs off and EMS and more traditional PSS/E or power flow studies those requirements that talk about monitor or access to information apply equally. Example: If an entity chooses to use a Eastern Interconnection base model to satisfy



<p>TOP-002 Requirement 1 that entity would have to also have to be in compliance with TOP-001 Requirement 13. Requirement 13 states that the TOP has to monitor or have access to information about condition and Facilities. By default a TOP would have to have access to information about every facility in the Eastern Interconnection model in order to be in compliance with calling the study a Operational Planning Analysis and By using the same term to represent different study time frames causes a number of compliance issues with this standard. We suggest that the team either determines a single meaning for the term Operational Planning Analysis or clarifies the compliance obligations around the different time frames for Operational Planning Analysis.</p>
Individual
L Zotter, S Solis, C Frosch, JC Culberson, S Myers, S Jue, M Morais, C Thompson
ERCOT ISO
No
<p>R1 – ERCOT ISO does not agree with the addition of the word ‘identified’ because it implies each Reliability Directive needs to be preceded with an additional statement like “the following is a Reliability Directive”. In a true emergency, clear concise communication and an understanding of what action is required to mitigate the situation is necessary. The addition of another sentence before each required action delays communication. ERCOT ISO thinks a Reliability Directive should not have to be declared as such, prior to issuance. Compliance should not be measured by whether the System Operator remembered to state “this is a Reliability Directive”, but should be measured by whether the Reliability Directive was properly issued and three-part communication was utilized. NOTE: Requirements 1 and 2 are dependent upon the approval of the term Reliability Directive, which is being proposed by Project 2006-06 Reliability Coordination. R2 – Add Operations Planning to the Time Horizon because R1 includes Operations Planning in the Time Horizon. R1 and R2 occur in the same Time Horizons, since R1 requires an entity to comply to a Reliability Directive issued by a TOP and R2 requires an entity who cannot comply to notify the issuing TOP. NOTE: Requirements 1 and 2 are dependent upon the approval of the term Reliability Directive, which is being proposed by Project 2006-06 Reliability Coordination. R9 VSL – The TOP, when notifying the RC, should identify the appropriate Tv. The associated VSL should be high and not severe and should only be severe when multiple instances occur.</p>
Yes
No
<p>R1.1 – The phrase ‘to be exchanged’ seems to be unnecessary. M2 and M3 – These measures allude to evidence of information actually being distributed, yet some companies make information available to entities through website posting or other public forums. Please include showing proof of availability of information to an entity as an option in these measures. M4 – The last sentence should be revised to match the last sentence of M5. Consider rewording both M4 and M5 as follows: “The evidence shall be that there are no Transmission Operators or Balancing Authorities with outstanding requests for data to the subject responsible entity that have been unfilled.” The R2 and R3 VSLs have percentage approaches, but the R4 and R5 VSLs are binary, even though there are multiple elements to data specifications referred to in R4 and R5. All four of these requirements should have percentage approaches. Similarly, there are requirements for the RC (in IRO-010) to document data specifications. The associated IRO-010 R1 and R2 VSLs also have a percentage based approach. To be consistent, the TOP-003-2 R4 and R5 VSLs need to be changed to the percentage based approach for consistency.</p>
There will be no change to reliability
Group
Western Electricity Coordinating Council
Steve Rueckert
<p>Under R1 of the standard the word “identified” is used to describe a specific type of Reliability Directive issued by the Transmission Operator. Who performs the work or makes the identification of an “identified” reliability directive? Why under R2 is the classification not carried on to describe the RC directive such as “of its inability to perform an IDENTIFIED Reliability Directive”?</p>
There will be no change to reliability
Individual
Michael Gammon
Kansas City Power & Light

No

Requirements R3 & R5 requires TOP's to notify all other "affected" or have an "adverse reliability impact" TOP's of an emergency condition. The terms "affected" and "adverse reliability impact" is a debatable condition and subject to interpretation. As proposed, this requirement will be difficult to audit and will cause uncertainty in the industry. Recommend the requirement be modified to alert other TOP's whenever a TOP in an emergency condition becomes aware of operating conditions that would result in exceeding an SOL or IROL operating limits under N-1 contingency conditions for other TOP facilities. Modifications for these two requirements will result in subsequent changes to the Measures and VSL's for requirements R3 & R5.

Yes

No

Requirement R4 may be troublesome for small Registered Entities to meet the data requirements dictated by larger Registered Entities. There is no recognition of the limitations of data exchange capability with an entity. Recommend requirement R4 be modified to include "within the data exchange capabilities of the recipient of the data specification". Modifications here would result in changes to the Measure and VSL for requirement R4.

There will be no change to reliability

