

Comment Report

Project Name: Standards Efficiency Review | SAR 2nd Posting
Comment Period Start Date: 8/28/2018
Comment Period End Date: 9/26/2018
Associated Ballots:

There were 36 sets of responses, including comments from approximately 140 different people from approximately 95 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the recommendations and rationales to retire the proposed requirements? If not, please state the standard(s) and requirement number(s) in your response(s) along with your rationale(s) for not retiring the requirement(s).

2. Do you agree that NERC should proceed with this project?

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Florida Municipal Power Agency	Brandon McCormick	3,4,5,6	FRCC	FMPA	Tim Beyrle	City of New Smyrna Beach Utilities Commission	4	FRCC
					Jim Howard	Lakeland Electric	5	FRCC
					Lynne Mila	City of Clewiston	4	FRCC
					Javier Cisneros	Fort Pierce Utilities Authority	3	FRCC
					Randy Hahn	Ocala Utility Services	3	FRCC
					Don Cuevas	Beaches Energy Services	1	FRCC
					Jeffrey Partington	Keys Energy Services	4	FRCC
					Tom Reedy	Florida Municipal Power Pool	6	FRCC
					Steven Lancaster	Beaches Energy Services	3	FRCC
					Mike Blough	Kissimmee Utility Authority	5	FRCC
					Chris Adkins	City of Leesburg	3	FRCC
	Ginny Beigel	City of Vero Beach	3	FRCC				
Exelon	Chris Scanlon	1,3,5,6		Exelon Utilities	Chris Scanlon	BGE, ComEd, PECO TO's	1	RF
					John Bee	BGE, ComEd, PECO LSE's	3	RF
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF

MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service Corporation	3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
Mike Morrow	Midcontinent ISO	2	MRO					
PPL - Louisville Gas and Electric Co.	Devin Shines	3,5,6	RF,SERC	Louisville Gas and Electric Company and Kentucky Utilities Company	Charles Freibert	PPL - Louisville Gas and Electric Co.	3	SERC
					JULIE HOSTRANDER	PPL - Louisville Gas and Electric Co.	5	SERC
					Linn Oelker	PPL - Louisville Gas and Electric Co.	6	SERC
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC		Pawel Krupa	Seattle City Light	1	WECC

				Seattle City Light Ballot Body	Hao Li	Seattle City Light	4	WECC
					Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
					Tuan Tran	Seattle City Light	3	WECC
					Laurrie Hammack	Seattle City Light	3	WECC
CMS Energy - Consumers Energy Company	Jeanne Kurzynowski	1,3,4,5	RF	Consumers Energy Company	Jeanne Kurzynowski	Consumers Energy Company	1,3,4,5	RF
					Jim Anderson	Consumers Energy Company	1	RF
					Karl Blaszkowski	Consumers Energy Company	3	RF
					Theresa Martinez	Consumers Energy Company	4	RF
					David Greyerbiehl	Consumers Energy Company	5	RF
Southwest Power Pool, Inc. (RTO)	Jim Williams	2	MRO,SERC	SPP Standards Review Group	Jim Williams	SPP	2	MRO
					Shannon Mickens	SPP	2	MRO
DTE Energy - Detroit Edison Company	Karie Barczak	3,4,5		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Southern Company - Southern	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC

Company Services, Inc.					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
Michael Jones	National Grid	3	NPCC					

					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Sean Cavote	PSEG	4	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					David Kiguel	Independent	NA - Not Applicable	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Caroline Dupuis	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
PSEG	Sean Cavote	1,3,5,6	NPCC,RF	PSEG REs	Tim Kucey	PSEG - PSEG Fossil LLC	5	NPCC
					Karla Barton	PSEG - PSEG Energy Resources and Trade LLC	6	RF
					Jeffrey Mueller	PSEG - Public Service	3	RF

						Electric and Gas Co.		
					Joseph Smith	PSEG - Public Service Electric and Gas Co.	1	RF
Associated Electric Cooperative, Inc.	Todd Bennett	1,3,5,6		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Jeff Neas	Sho-Me Power Electric Cooperative	3	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Ted Hilmes	KAMO Electric Cooperative	3	SERC
					Walter Kenyon	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC					

					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. Do you agree with the recommendations and rationales to retire the proposed requirements? If not, please state the standard(s) and requirement number(s) in your response(s) along with your rationale(s) for not retiring the requirement(s).

Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF, Group Name Consumers Energy Company

Answer No

Document Name

Comment

Consumers Energy's position is that PRC-004-5(i) R4 can be removed as long as comments are added to R5 to clarify that a "meaningful investigation must occur to determine the root cause". That statement can then be considered for the next SAR committee.

If the statement can't be considered at the next SAR committee, then Consumers' position would be to go with leaving R4.

Consumers Energy is in agreement with retirement of the other requirements recommended for retirement.

Likes 0

Dislikes 0

Response

Thank you for your comment and support. The additional requirements suggested are not identified within the SAR, and thus are out of scope for this project. Your comment will be referred to the Phase II Standards Efficiency Review Team for consideration in a future phase of their work.

Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

APS agrees with the vast majority of these recommended retirements, but APS disagrees that EOP-005-3 R8 is duplicative of activities covered by the Systematic Approach to Training in Reliability Standard PER-005-2. While system restoration is a reliability-related task that would be included in an entity's training program for its System Operators, it is a risk to assume that all Transmission Operators would provide System restoration training under its operations training program at the frequency and of the scope required under EOP-005-2, R8 (parts 8.1-8.5).

Likes 0

Dislikes 0

Response

Thank you for your comments.

The SER SDT agrees that Requirement R8 of EOP-005-3 be retained. The SER SDT also believes that Requirement R7 of EOP-006-3 be maintained. The PER-005 standard entails training processes, however it does not specifically provide for system restoration training.

In PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was, in part, based on the existence of former Requirement R10 in EOP-005-2 (Requirement R8 of EOP-005-3). If Requirement R8 in EOP-005-3 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any of the standards.

The SDT believes a specific requirement for system restoration training should be maintained because, while a system shutdown is low probability, it could have a high impact if not done properly.

The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to system restoration training; and, if there is that opportunity, then Requirement R8 of EOP-005-3 may be able to be looked at for retirement within that project or in a future project. If certain elements are essential within an entity's training program, those elements should be explicitly identified in a future version of PER-005 prior to retiring from other standards; such as those identified in EOP-005.

Devin Shines - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer No

Document Name

Comment

Louisville Gas and Electric Company and Kentucky Utilities Company (LG&E/KU) strongly disagrees with the proposed retirement of VAR-001-4.2 R2 because requiring each Transmission Operator to schedule, provide, and have evidence of scheduling sufficient reactive resources to regulate voltage levels under normal and Contingency conditions is necessary for the reliability of the BES. Reactive power resources are required to maintain voltage stability on the BES. Therefore, removing the requirement to ensure that each Transmission Operator schedules and provides sufficient reactive resources and has the documentation that sufficient reactive resources have been scheduled will be harmful to ensuring the reliability of the BES. Instead of retiring VAR-001-4.2 R2, there should be additional guidance (i.e. Implementation Guidance) to suggest how the transmission control center complies with R2.

Likes 0

Dislikes 0

Response

Thank you for your comment.

VAR-001-5, Requirement R2 is duplicative with the existing requirements in the TOP-001-4 and TOP-002-4 standards, which direct the TOP to plan and operate within in System Operating Limit (SOL) values, which includes system voltage limits. TOP-002-4, Requirement R1, requires the Transmission Operator to complete an Operational Planning Analysis (OPA) to assess whether any of its planned operations for the next day will exceed any System Operating Limits (SOL) ; TOP-001-4, Requirement R10 provides the criteria that the TOP shall use for determining SOL exceedances, which includes monitoring voltages. If an SOL violation is identified, then the TOP shall have an Operating Plan to mitigate the violation. TOP-001-4 and TOP-002-4 requirements direct the TOP to maintain reliability of the BES and mitigate SOL exceedances. If the TOP identifies no SOLs, voltage or otherwise, then the TOP has enough resources "scheduled" to maintain reliability of its BES. Requirements R1, R3, R4, R5 and R6 of VAR-001-5 ensure that a TOP require that voltage, reactive flows, and reactive resources are monitored, controlled, and maintained with limits. Finally, the FAC Standards ensure the proper BES Facilities and/or Elements are built with applicable equipment and system ratings.

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer No

Document Name

Comment

MOD-001-2: Duke Energy objects to the drafting team’s recommendation to retire MOD-001-2. FERC has not yet ruled on NAESB standards, and eliminating the responsibilities in MOD-001-2 would be in direct conflict with FERC Order 890 and would leave the industry with no consistency on calculation of ATC. Without a consistent method of calculating ATC throughout the industry this would potentially force a BA/TOP to inspect every Tag. This is avoided by having MOD-001-2 enforceable.

FAC-013-2: Duke Energy re-states its disagreement with the proposal regarding FAC-013-2. This standard was developed in response to FERC Directives in Orders 693 and 729. In the Orders, FERC directed NERC to establish a standard requiring Planning Coordinators to calculate transfer capability in the planning horizon (years one through five) and communicate the results. We disagree with the notion that FAC-013-2 has no bearing on reliability of the BES. In the FAC-013-2 — Planning Transfer Capability White Paper that was drafted during development of the standard, the standard’s benefit to reliability is stated:

“Further, FAC-013-2 requires that a Planning Transfer Capability Methodology Document (PTCMD) be developed for the calculation of Planning Transfer Capabilities (PTC) beyond 13 months in the future to provide additional information for the Planning Coordinator to use in planning for BES reliability.”

Another pertinent excerpt from the White Paper mentions how FAC-013-2 covers aspects of grid reliability not covered in the TPL standards:

“The TPL planning standards do not specify the need to document transfer capability calculation methods that may be used in the planning horizon. To cover that aspect of planning for BES reliability, the FAC-013-2 standard specifies that Planning Coordinators must perform PTC calculations as part of the planning process, that the method must be documented and shared with other entities as specified in the standard.”

Lastly, see the quote from the White Paper below that further illustrates the necessity of FAC-013-2, and how it helps address past concerns from FERC.

“The application of FAC-013-2 will provide PTC values that are an indicator of the robustness of the future transmission system and facilitate communication between adjacent Planning Coordinators. It will result in meeting FERC’s concerns regarding transfer capability in the planning horizon and provide important information that Planning Coordinators will be able to apply in their efforts to reliably plan the BES.”

IRO-017 (R3): FERC mandated that RC’s and TP’s coordinate on the impact of known outages on TPL assessment results. It appears that the SDT believes that this can be retired because the TPL standard requires TP’s to send their assessment results to adjacent PC’s and TP’s and anyone else who asks. The result of this retirement may mean that nothing gets to the RC unless they ask and even then it doesn’t require the TP and RC to work together to resolve conflicts.

Likes 0

Dislikes 0

Response

Thank you for your comments.

IRO-017-1, Requirement R3: IRO-017-1 is not entirely duplicative of TPL-001-4, Requirement R8. The RC should be added as a named recipient to TPL-001-4 prior to considering IRO-017-1, Requirement R3 for retirement. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R3 of IRO-017-1 to determine if there is opportunity for revisions to TPL-001-4 to name the RC as a recipient; and, if there is that opportunity, then Requirement R3 of IRO-017-1 may be able to be looked at for retirement within that project or in a future project.

MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a, MOD-030-3 and proposed MOD-001-2 – ATC/AFC, as well as tags (or eTags) are commercially-focused elements, facilitating interchange and balancing of interchange. The real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC’s statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where they stated, “NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system.” FERC acknowledged this in their March 15, 2015 order, where

they stated, “we approve NERC’s proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules.”

FAC-013-2 - It is important to note the white paper referenced in the above comment was written in 2010. There have been significant substantive changes to the body of standards since that time. For example, referenced TPL and MOD standards have been superseded by newer versions, and other standards never became effective (FAC-012).

The white paper does not demonstrate continued need for the FAC-013-2 standard for the following reasons:

- As stated in the SER’s justification for the retirement of FAC-013, “assessing transfer capability above the “known commitments for Firm Transmission Service and Interchange” required by TPL-001-4 Requirement R1.1.5 (2014), serves a market function as opposed to securing System reliability.” It is true that some entities depend on power transfers to meet their load obligations, and assessing transfers would provide that entity a reliability benefit, but that is not true for all other entities.
- Also as stated in the SER’s justification for the retirement of FAC-013, “R4 only requires the assessment to be performed for one year in the Near-Term Transmission Planning Horizon. This year can be arbitrarily chosen by the PC and the analysis does not guarantee transmission service that is necessary for System reliability.”
- The FAC-013 standard does not contain a requirement to develop or communicate “transfer capabilities” (values).
- There is no minimum performance requirement or minimum acceptable transfer capability or margin documented in the standard.

The requirement for Planning Coordinators (PC) to have a methodology for and to perform an annual assessment of Transfer Capability for a single year in the Near-Term Transmission Planning Horizon does not benefit System reliability beyond that provided by other Reliability Standards. This Reliability Standard is primarily administrative in nature and does not require specific performance metrics or coordination among functional entities. In general, FAC-013-2 fails to meet System reliability objectives in the following ways:

- Individual PCs develop their own methodologies that may be very disparate from each other.
- Impacted functional entities, such as Transmission Planners (TP), do not have meaningful input into the methodology or analysis.
- The standard does not specify performance metrics or define what acceptable system performance is.
- Entities that receive the methodology or assessment results are not obligated to use or even consider the information in their assessments.
- R4 only requires the assessment to be performed for one year in the Near-Term Transmission Planning Horizon. This year can be arbitrarily chosen by the PC and the analysis does not guarantee transmission service that is necessary for System reliability.
- Assessing transfer capability above the “known commitments for Firm Transmission Service and Interchange” required by TPL-001-4 (R1.1.5), serves a market function as opposed to securing System reliability.
- Assessing transfer capability in the planning horizon is a method to test the robustness of the system. Robustness testing of a system is not an indicator of reliability because there is no metric for robustness. Additionally, the proposed retirement of FAC-013 does not preclude any entity from performing studies to assess transfer capability for their own purposes. The reliability benefit of doing such an assessment varies from entity to entity, with some entities not having a benefit for the assessment it at all. The 2013 NERC Independent Experts Review Project identified R2 and R3 as administrative and recommended them for retirement. R3 was approved for retirement by FERC in 2014.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion

Answer	No
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Document Name	
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Comment

We agree with the majority of the retirement recommendations of the SER teams in all but a few instances. These are listed below:

INT-009-2.1 R2

The SAR rationale is that it is redundant with NAESB business practices. However, NAESB rules are not applicable in Ontario. While NAESB is more stringent, during reliability curtailments, system operators require flexibility given to them by INT-010 to manage the e-tags.

IRO-002-5 R4

This requirement is needed for the system operator to manage the grid.

IRO-008-2 R6

Keeping impacted entities informed in a timely fashion is good operating practice.

TOP-001-4 R16

This requirement is needed for the system operator to manage the grid.

TOP-001-4 R17

This requirement is needed for the system operator to manage the grid.

In the rationale presented to retire COM-002-4 R2, the SER is assuming or expecting that initial training for each of its operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System is being covered in PER-005-2. PER-005-2 does not prescribe what training entities must include.

In the rationale presented to retire EOP-005-3 R8, the SER is assuming or expecting that System restoration is a reliability-related task and would be included in an entity's training program for its System Operators. PER-005-2 does not prescribe what training entities must include.

FAC-003-4 Requirements R5 and R6: These requirements should be retired because R5 and R6 are controls and good utility practices but do not enhance BES reliability over R1 and R2. R1 and R2 fulfil the purpose of the standard through measurable actions. Also, the NERC Rules of Procedure allow consideration for extenuating circumstances relative to R5.

FAC-008-3 Requirement R8: Requirements R.8.1.2 and R8. 2 are not duplicative of TOP-003-3 or IRO-010-2. FAC-008-3 Requirement R8.2 necessitates that TOs provide to their associated RCs, PCs, TPs, TOs and TOPs the Requirement R8.1.2 "identity of the most limiting equipment of the Facilities," Requirement R8.2.1 "identity of the existing next most limiting equipment of the Facilities," and Requirement R8.2.2 "Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1," whereas the TOP-003-3 or IRO-1010-2 standards do not appear to have this requirement.

IRO-010-2 Requirement R1 specifies the types of data that an RC collects from applicable entities, so that the RC may perform OPAs, RTM and RTAs. The OPA RTM and RTA definitions (in the NERC Glossary of Terms) each mention "Facility Ratings" as an input (into OPA's, RTM and RTA's). However, neither IRO-010-2, Requirement R1, nor the OPA, RTM and/or RTA definitions (in the NERC Glossary of Terms) contain the level of specificity in FAC-008-3 Requirement R8 (to "identity the most and the existing next most limiting equipment of the Facilities" and "the Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1"). Similarly, TOP-003-3 Requirement R5 requires identified entities to fulfill a data specification provided by a BA or TOP so that OPAs, RTM, and RTA's may be performed. As in the case of IRO-010-2 Requirement R1 and the OPA, RTM and RTA definitions, TOP-003-3 does not require identification of the most and the existing next most limiting equipment of the Facilities and the Thermal Rating for the next most limiting equipment identified in FAC-008-3 Requirement R8, Part 8.2.1."

NUC-001-3 R1: The requirement is administrative in nature, as Requirement R1 actions are inherent in Requirement R2 since each entity "shall have in effect" an agreement.

Likes 0

Dislikes 0

Response

Thank you for your comments:

INT-009-2.1, Requirement R2: This requirement can be retired under Paragraph 81 criteria, as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7. As discussed in the SAR, the SDT recommends retirement of INT-009-2.1, Requirement R2.

FAC-008-3/4, Requirement 8: This requirement is duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Provider (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC.

IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.

COM-002-4, Requirement R2: While the SDT agrees that training on communications protocols would fall into an entity's systematic approach to training, the requirements do not explicitly mandate training on communications protocols. It is essential for all operators to have a common level of understanding and be trained in three-part communication. During development of COM-002-4, it was determined that because PER-005 would not meet the NERC Board of Trustees November 7, 2013 Resolution to mandate training, that SDT included a requirement to conduct initial training in order to ensure that a baseline of training is complete before an individual is placed in a position to use the communications protocols. Requiring initial training is not overly burdensome to an entity and any subsequent training can be covered in PER-005 or through the operator feedback loop as determined by the entity.

The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R2 of COM-002-4 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to training on communications protocols; and, if there is that opportunity, then Requirement R2 of COM-002-4 may be able to be looked at for retirement within that project or in a future project.

EOP-005-3, Requirement R8 and EOP-006-3 Requirement R7:

The SER SDT agrees that Requirement R8 of EOP-005-3 be retained. The SER SDT also believes that Requirement R7 of EOP-006-3 be maintained. The PER-005 standard entails training processes, however it does not specifically provide for system restoration training.

In PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was, in part, based on the existence of former Requirement R10 in EOP-005-2 (Requirement R8 of EOP-005-3) and Requirement R9 in EOP-006-2 (Requirement R7 of EOP-006-3). If Requirement R8 in EOP-005-3 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any of the standards.

The SDT team believes a specific requirement for system restoration training should be maintained, because while a system shutdown is low probability, it could have a high impact if not done properly. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to system restoration training; and, if there is that opportunity, then Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 may be able to be looked at for retirement within that project or in a future project. If certain elements are essential within an entity's training program, those elements should be explicitly identified in a future version of PER-005 prior to retiring from other standards; such as those identified in EOP-005 and EOP-006.

NUC-001-3 R1: Is out of scope for this projects, as it is not listed in the final SAR. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R1 of NUC-001-3 to determine if there is opportunity for revisions; and, if there is that opportunity, then Requirement R1 of NUC-001-3 may be able to be looked at for retirement within that project or in a future project.

Leonard Kula - Independent Electricity System Operator - 2

Answer	No
Document Name	
Comment	

IESO thanks the Standard Efficiency Review (SER) teams for all their hard work reviewing and analyzing the NERC Standards and requirements for possible retirements. The IESO agrees with the majority of the retirement recommendations of the SER teams in all but a few instances. These are listed below:

INT-009-2.1 R2

The SAR rationale is that it is redundant with NAESB business practices. NAESB is not regulatory and, therefore, we are not measured by compliance to NAESB. Furthermore, we do not design our business practices around NAESB rules.

While NAESB is more stringent, during reliability curtailments, we need the flexibility given to us by INT-010. This standard allows us to take action to address a reliability need and manage the e-tags after the concern has been addressed – allowing us to manage the e-tags later. We still need this flexibility as the e-tag system does not feed our dispatch tool directly and we would not want to be the “hold up” for a reliability curtailment so we can line up e-tag with our dispatch tools.

IRO-002-5 R4

This is fundamental to how we manage the grid. In the absence of this standard the RC's ability to monitor its BES area may become unavailable or deteriorated with no knowledge to the system operator.

IRO-008-2 R6

When and RC, TOP or BA becomes aware another RC is exceeding an SOL or an IROL that RC, TOP or BA may need to take mitigating actions to maintain reliability, therefore we disagree that with the SAR rationale that this requirement is administrative in nature and does provide reliability benefit. Keeping impacted entities informed in a timely fashion is good operating practice.

TOP-001-4 R16

This is fundamental to how we manage the grid. In the absence of this standard the TOP's ability to monitor its BES area may become unavailable or deteriorated with no knowledge to the system operator.

TOP-001-4 R17

This is fundamental to how we manage the grid. In the absence of this standard the TOP's ability to monitor its BES area may become unavailable or deteriorated with no knowledge to the system operator.

Likes 0

Dislikes 0

Response

Thank you for your comments.

INT-009-2.1, Requirement R2: This requirement can be retired under Paragraph 81 criteria, as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7. As discussed in the SAR, the SDT recommends retirement of INT-009-2.1, Requirement R2.

TOP-001-4, Requirements R16 and R17 – The SDT agrees that these requirements are necessary for the real-time operators to be assured of having the tools necessary to monitor the BES and does not intend to seek retirement of these Requirements during this phase of the project.

IRO-002-5, Requirement R4 - The SDT agrees that these requirements are necessary for the real-time operators to be assured of having the tools necessary to monitor the BES and does not intend to seek retirement of this Requirement during this phase of the project.

IRO-008-2, Requirement R6 – Although IRO-008-2, Requirement R6 appears to be administrative in nature, the SDT believes there are reliability benefits to knowing what actions were taken to prevent or mitigate the exceedance. Therefore, the team does not intend to seek retirement of this Requirement during this phase of the project.

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer No

Document Name

Comment

PSEG generally agrees with the purpose, scope, and content of the SAR, with the following exceptions:

FAC-003-4 Requirements R5 and R6: These requirements should be retired because R5 and R6 are controls and good utility practices but do not enhance BES reliability over R1 and R2. R1 and R2 fulfil the purpose of the standard through measurable actions. Also, the NERC Rules of Procedure allow consideration for extenuating circumstances relative to R5.

FAC-008-3 Requirement R8: Requirements R.8.1.2 and R8. 2 are not duplicative of TOP-003-3 or IRO-010-2. FAC-008-3 Requirement R8.2 necessitates that TOs provide to their associated RCs, PCs, TPs, TOs and TOPs the Requirement R8.1.2 “identity of the most limiting equipment of the Facilities,” Requirement R8.2.1 “identity of the existing next most limiting equipment of the Facilities,” and Requirement R8.2.2 “Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1,” whereas the TOP-003-3 or IRO-1010-2 standards do not appear to have this requirement.

IRO-010-2 Requirement R1 specifies the types of data that an RC collects from applicable entities, so that the RC may perform OPAs, RTM and RTAs. The OPA RTM and RTA definitions (in the NERC Glossary of Terms) each mention “Facility Ratings” as an input (into OPA’s, RTM and RTA’s). However, neither IRO-010-2, Requirement R1, nor the OPA, RTM and/or RTA definitions (in the NERC Glossary of Terms) contain the level of specificity in FAC-008-3 Requirement R8 (to “identity the most and the existing next most limiting equipment of the Facilities” and “the Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1”). Similarly, TOP-003-3 Requirement R5 requires identified entities to fulfill a data specification provided by a BA or TOP so that OPAs, RTM, and RTA’s may be performed. As in the case of IRO-010-2 Requirement R1 and the OPA, RTM and RTA definitions, TOP-003-3 does not require identification of the most and the existing next most limiting equipment of the Facilities and the Thermal Rating for the next most limiting equipment identified in FAC-008-3 Requirement R8, Part 8.2.1.”

NUC-001-3 R1: The requirement is administrative in nature, as Requirement R1 actions are inherent in Requirement R2 since each entity “shall have in effect” an agreement.

Likes 0

Dislikes 0

Response

Thank you for your comments.

FAC-003-4 R5 and R6, and NUC-001-3 are not identified within the SAR, and thus are out of scope for this project. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

FAC-008-3/4, Requirement 8: This requirement is duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3.

In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Provider (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC.

IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.

NUC-001-3 R1: Is out of scope for this projects, as it is not listed in the final SAR. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R1 of NUC-001-3 to determine if there is opportunity for revisions; and, if there is that opportunity, then Requirement R1 of NUC-001-3 may be able to be looked at for retirement within that project or in a future project.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

In general Southern Company agrees with the proposed requirements for retirement. However, Southern Company disagrees with the recommendations and rationales to retire the proposed requirements as noted below:

Southern does not agree with the recommendation and rationale to retire BAL-005-1 R4 and R6. We believe that it is in the best interest of both clarity and reliability to have these requirements in both the BA and TOP standards as these functions are separately registered.

Southern does not agree that NERC should withdraw the petition regarding MOD-001-2. The combined effect of both MOD-001-2 and NAESB's WEQ-023 strike the appropriate balance between reliability and market related issues.

Southern Company recommends delaying the retirement of MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 until NERC's MOD-001-2 and NAESB's WEQ-023 are approved by the Commission (FERC). Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.

Southern believes that reliability-related tasks are determined by each individual entity. There is no obligation in the current NERC Reliability Standards to include the topics covered in EOP-005-3 (R8) or EOP-006-3 (R7) in the reliability related tasks for a TOP.

Southern believes that reliability related tasks are determined by each individual entity. There is no obligation in a NERC standard requirement to include the topics covered in COM-002-4 R2 in the Reliability Related tasks for a TOP.

Southern does not agree with the rationale for retiring IRO-002-5 R4. While we agree with the statement in the rationale, it doesn't cover how an Operator has authority over various entities to direct the cancellation of outages. It's not found anywhere else in the NERC standards and for entities where the TOP may be a different company than the RC, an appropriately written NERC standard would help ensure that the RC Operator had the authority to deny a telecommunications outage that affected key operational data provided by the TOP to the RC.

Southern does not agree with the recommendation for IRO-014-3 R3. R1.1 does not require notification of RCs and leaves it to the discretion of the RC experiencing the emergency to determine who is notified. Moreover, what if the Emergency being experienced is not covered in an Operating Procedure, Process or Operating Plans? The rationale assumes that all Operating Plans are generic and would cover all possible Emergencies experienced, but R1 of the standard doesn't state that.

Southern does not agree with the overall rationale for retiring TOP-001-4 R16 and R17. While we support the wording in the rationale, it doesn't fully encapsulate how an Operator has authority over entities to direct the cancellation of outages. This language is not found anywhere else in the NERC Reliability Standards and for entities where the TO and GO may be a different company than the TOP, an appropriately written NERC standard would help ensure that the TOP Operator had the authority to deny a telecommunications outage that affected key operational data provided by the TO and/or GO to the TOP.

Likes 0

Response

Thank you for your comments.

The SER SDT agrees that Requirement R4 and R6 of **BAL-005-1** be retained, as both requirements are specific to the calculation of the ACE. The TOP-010-1(i) R2 covers ACE with the wording of “analysis functions and Real-time monitoring” but does not cover specifics such as quality flags for missing or invalid data that is part of the requirement for BAL-005-1 R4 or the accuracy of scan rates that is part of BAL-005-1 R6.

In TOP-010-1(i) R2 (revised from TOP-010-1) the requirement R2 covers the calculation and monitoring of ACE, while the language “ Each Balancing Authority shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring” this is only addressing quality. In BAL-005-1 (revised from BAL-005-0.2b) the requirement R4 states “The Balancing Authority shall make available to the operator information associated with Reporting ACE including, but not limited to, quality flags indicating missing or invalid data. Requirement R6 of BAL-005-1 states “Each Balancing Authority that is within a multiple Balancing Authority Interconnection shall implement an Operating Process to identify and mitigate errors affecting the accuracy of scan rate data used in the calculation of the Reporting ACE for each Balancing Authority Area. Both of these requirements are specific to identifying missing or invalid data plus scan rates not just the quality of the Real-time data.

The SER Phase I SDT will communicate the SR Phase II SAR DT regarding Requirement R4 and R6 of BAL-005-1 to determine if there is opportunity for revisions to TOP-010-1(i) R2 that would satisfy the missing or invalid data plus scan rates and if there is that opportunity, then Requirements R4 and R6 of BAL-005-1 may be able to be looked at for retirement within the project or in a future project.

EOP-005-3, Requirement R8 and EOP-006-3 Requirement R7:

The SER SDT agrees that Requirement R8 of EOP-005-3 be retained. The SER SDT also believes that Requirement R7 of EOP-006-3 be maintained. The PER-005 standard entails training processes, however it does not specifically provide for system restoration training.

In PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was, in part, based on the existence of former Requirement R10 in EOP-005-2 (Requirement R8 of EOP-005-3) and Requirement R9 in EOP-006-2 (Requirement R7 of EOP-006-3). If Requirement R8 in EOP-005-3 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any of the standards.

The SDT team believes a specific requirement for system restoration training should be maintained, because while a system shutdown is low probability, it could have a high impact if not done properly. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to system restoration training; and, if there is that opportunity, then Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 may be able to be looked at for retirement within that project or in a future project. If certain elements are essential within an entity’s training program, those elements should be explicitly identified in a future version of PER-005 prior to retiring from other standards; such as those identified in EOP-005 and EOP-006.

COM-002-4 Requirement R2:

While training on communications protocols would fall into an entity’s systematic approach to training, the requirements do not explicitly mandate training on communications protocols. It is essential for all operators to have a common level of understanding and be trained in three-part communication. During development of COM-002-4, it was determined that because PER-005 would not meet the NERC Board of Trustees November 7, 2013 Resolution to mandate training, that SDT included a requirement to conduct initial training in order to ensure that a baseline of training is complete before an individual is placed in a position to use the communications protocols. Requiring initial training is not overly burdensome to an entity and any subsequent training can be covered in PER-005 or through the operator feedback loop as determined by the entity.

The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R2 of COM-002-4 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to training on communications protocols; and, if there is that opportunity, then Requirement R2 of COM-002-4 may be able to be looked at for retirement within that project or in a future project.

IRO-014-3, Requirement R3: The reliability objective of “notification” is mandated as a part of the RC having and implementing Operating Procedures, Operating Processes, or Operating Plans that include criteria and processes for notifications (R1, Part 1.1), this ensures RC operations are coordinated to maintain reliability of the

BES. As such a separate requirement for ensuring notifications are made to impacted RC's is duplicative. Requirement R1 would need to have a revised time horizon to Real-time horizon added to retire R3.

MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a, MOD-030-3 and proposed MOD-001-2 – ATC/AFC, as well as tags (or eTags) are commercially-focused elements, facilitating interchange and balancing of interchange. The real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where they stated, "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 order, where they stated, "we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

TOP-001-4, Requirements R16 and R17 – The SDT agrees that these requirements are necessary for the real-time operators to be assured of having the tools necessary to monitor the BES and does not intend to seek retirement of these Requirements during this phase of the project.

IRO-002-5, Requirement R4 - The SDT agrees that these requirements are necessary for the real-time operators to be assured of having the tools necessary to monitor the BES and does not intend to seek retirement of this Requirement during this phase of the project.

Michael Godbout - Hydro-Québec TransÉnergie - 1 - NPCC

Answer	No
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Document Name	
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Comment

We agree with all the requirements proposed for retirement and with their rationales, except for the following:

FAC-008-3 R7

We disagree with the rationale. As stated in the Hydro-Québec TransÉnergie's comments on the previous SAR, requirement FAC-008-3 R7 is not entirely redundant to MOD-032, IRO-010 and TOP-003 because the latter requirements do not address all the functions of FAC-008-3 R7. Namely, the TO function is excluded. The rationale should state that the TO function request is not essential to reliability and on that basis it is dropped and the remaining obligations are redundant to the aforementioned alternatives. If that is out of scope of this project, it should be addressed in the follow-on project. We consider that the requirement should be removed, one way or the other.

IRO-002-5 R6

We disagree with the stated rationale. As stated in the Hydro-Québec TransÉnergie's comments on the previous SAR, R6 requires communication over a "redundant infrastructure" which is not mentioned in requirement R5. Arguably, that aspect could be considered redundant to R2. In that case, the recommendation would remain valid.

COM-002-4 R2, EOP-005-3 R8, EOP-006-3 R7

The proposed transfer to PER-005-2 could leave a gap, as per our informal comments on the matter in the previous comment round.

IRO-006-5 R1

The applicable entity in requirement R1 is the RC. IRO-001-4 R2 is not applicable to the RC function. As such, we disagree with the rationale and the recommendation.

IRO-017-1 R3

We disagree on the stated rationale and with the recommendation. Removing R3 shifts the responsibility for identifying the affected RC by a plan from the planner to the RC. Therefore, R3 is not duplicative with TPL-001-4 R8.

MOD-020-0 R1

We disagree with the rationale. MOD-020-1 allows operators (RC and TOP) to request information. In contrast, MOD-031-2 does not give RC or TOP the authority to request DSM information. IRO-010-2 does give the RC that authority but does not apply to the RP. So unless the NERC functional model guarantees that the DP has that information, there could be a gap.

PRC-004-5(i) R4

We disagree with the rationale and with the recommendation. If it is the case that auditors consider a non-compliance with respect to R2 or R3 a violation regardless of R4, then R4 is indeed useless. Since the intention of the standard was to allow an entity to extend its examination period, R2, R3 and R4 should be rewritten to achieve this intent. Cutting out R4 changes the intention of the standard to provide extensions to entities in order for them to identify causes of misops.

Likes 0

Dislikes 0

Response Thank you for your support.

Thank you for your comments:

FAC-008-3/4, Requirement 8: This requirement is duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3.

In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Provider (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC.

IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.

IRO-002-5, Requirement R4 - The SDT agrees that these requirements are necessary for the real-time operators to be assured of having the tools necessary to monitor the BES and does not intend to seek retirement of this Requirement during this phase of the project.

EOP-005-3, Requirement R8 and EOP-006-3 Requirement R7:

The SER SDT agrees that Requirement R8 of EOP-005-3 be retained. The SER SDT also believes that Requirement R7 of EOP-006-3 be maintained. The PER-005 standard entails training processes, however it does not specifically provide for system restoration training.

In PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was, in part, based on the existence of former Requirement R10 in EOP-005-2 (Requirement R8 of EOP-005-3) and Requirement R9 in EOP-006-2 (Requirement R7 of EOP-006-3). If Requirement R8 in EOP-005-3 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any of the standards.

The SDT team believes a specific requirement for system restoration training should be maintained, because while a system shutdown is low probability, it could have a high impact if not done properly. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to system restoration training;

and, if there is that opportunity, then Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 may be able to be looked at for retirement within that project or in a future project. If certain elements are essential within an entity's training program, those elements should be explicitly identified in a future version of PER-005 prior to retiring from other standards; such as those identified in EOP-005 and EOP-006.

COM-002-4 Requirement R2:

While training on communications protocols would fall into an entity's systematic approach to training, the requirements do not explicitly mandate training on communications protocols. It is essential for all operators to have a common level of understanding and be trained in three-part communication. During development of COM-002-4, it was determined that because PER-005 would not meet the NERC Board of Trustees November 7, 2013 Resolution to mandate training, that SDT included a requirement to conduct initial training in order to ensure that a baseline of training is complete before an individual is placed in a position to use the communications protocols. Requiring initial training is not overly burdensome to an entity and any subsequent training can be covered in PER-005 or through the operator feedback loop as determined by the entity.

The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R2 of COM-002-4 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to training on communications protocols; and, if there is that opportunity, then Requirement R2 of COM-002-4 may be able to be looked at for retirement within that project or in a future project.

IRO-017-1, Requirement R3: IRO-017-1 is not entirely duplicative of TPL-001-4, Requirement R8. The RC should be added as a named recipient to TPL-001-4 prior to considering IRO-017-1, Requirement R3 for retirement. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R3 of IRO-017-1 to determine if there is opportunity for revisions to TPL-001-4 to name the RC as a recipient; and, if there is that opportunity, then Requirement R3 of IRO-017-1 may be able to be looked at for retirement within that project or in a future project.

IRO-006-5, Requirement R1 – This requirement is not identified in the SAR for this project and will not be proposed for retirement.

MOD-020-0, Requirement R1 – We disagree that MOD-031-2 and IRO-010-2 do not give the necessary entities the authority to request the relevant information and that those standard do not also require the associated entities to provide that information. Demand-Side Management data is necessarily related to the near-term operating time horizon, as well as the planning time horizons, but not to the real-time operating time horizon that the RC and TOP are operating in. According to TOP-001-4 R1 and R2, and IRO-001-4 R1, the RC, BA and TOP must operate the BES according to SOLs and IROLs, and do not generally have control over demand-side management. They do have the authority to issue Operating Instruction to other entities as needed to maintain BES reliability within SOLs and IROLs; the entities receiving Operating Instructions are obligated, per TOP-001-4 R3, to follow those instructions, subject to the exceptions noted within that requirement. Further, the Demand Response Availability Data System (DADS) collects and disseminates data regarding Demand Response programs according to Section 1600 of the NERC Rules of Procedure. All entities identified in MOD-020-0 R1 are sources of DADS data, have access to DADS data, or both.

PRC-004-5(i), Requirement R4: The Standard's purpose is to identify and correct the causes of Misoperations of Protection Systems for Bulk Electric System (BES) Elements. The Standard's Guideline and Technical Basis for R4, starting on Page 29, considers due diligence that an entity must make in determining the cause of a Protection System misoperation. The additional requirements suggested are not identified within the SAR, and thus are out-of-scope for this project. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

Brandon Gleason - Electric Reliability Council of Texas, Inc. – 2

Answer	No
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Document Name	
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Comment

Electric Reliability Council of Texas, Inc. (ERCOT) agrees with the recommendations and rationales to retire the following requirements identified in the Standards Authorization Request (SAR):

FAC-008-3 R7, R8

FAC-013-2 R1, R2, R4, R5, R6 (All)

INT-004-3.1 R1, R2, R3 (All)

TOP-001-4 R19, R22

ERCOT does not oppose the retirement of the following requirements identified in the SAR, but does not necessarily agree with each stated rationale articulated in support of retirement:

BAL-005-1 R4, R6

COM-002-4 R2

EOP-005-3 R8

EOP-006-3 R7

INT-006-4 R3.1, R4, R5

INT-009-2.1 R2

INT-010-2.1 R1, R2, R3 (All)*

IRO-002-5 R1, R4, R6

IRO-008-2 R6

IRO-014-3 R3

IRO-017 R3

MOD-001-1a R1, R2, R3, R4, R5, R6, R7, R8, R9 (All)

MOD-001-2 R1, R2, R3, R4, R5, R6 (All)

MOD-004-1 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, R12 (All)

MOD-008-1 R1, R2, R3, R4, R5 (All)

MOD-020-0 R1 (All)

MOD-028-2 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11 (All)

MOD-029-2a R1, R2, R3, R4, R5, R6, R7, R8 (All)

MOD-030-3 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10 (All)

PRC-015-1 R1, R2, R3 (All)

PRC-018-1 R1, R2, R3, R4, R5, R6 (All)

TOP-001-4 R16, R17

VAR-001-4.2 R2, R3

*Because INT-009-2.1 R1 refers to INT-010-2, it may be preferable to defer consideration of the retirement of the requirements in INT-010-2 to Phase II of Standards Efficiency Review.

ERCOT does not agree with the recommendation and rationale to retire the following standard identified in the SAR for the reasons stated below:

PRC-004-5(i) R4

ERCOT does not support the outright retirement of PRC-004-5(i) Requirement R4 because to do so would eliminate the requirement to investigate in its entirety. However, ERCOT agrees that the requirement as written may impose unnecessary burden by requiring repeated investigations despite the potential inability of a Transmission Owner, Generator Owner, or Distribution Provider to identify the cause(s) of a Misoperation.

Likes 0

Dislikes 0

Response

Thank you for your comments. The SER SDT will be updating rationales on proposed retirements as the project progresses.

The SER SDT agrees that Requirement R4 and R6 of **BAL-005-1** be retained, as both requirements are specific to the calculation of the ACE. The TOP-010-1(i) R2 covers ACE with the wording of “analysis functions and Real-time monitoring” but does not cover specifics such as quality flags for missing or invalid data that is part of the requirement for BAL-005-1 R4 or the accuracy of scan rates that is part of BAL-005-1 R6.

In TOP-010-1(i) R2 (revised from TOP-010-1) the requirement R2 covers the calculation and monitoring of ACE, while the language “ Each Balancing Authority shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring” this is only addressing quality. In BAL-005-1 (revised from BAL-005-0.2b) the requirement R4 states “The Balancing Authority shall make available to the operator information associated with Reporting ACE including, but not limited to, quality flags indicating missing or invalid data. Requirement R6 of BAL-005-1 states “Each Balancing Authority that is within a multiple Balancing Authority Interconnection shall implement an Operating Process to identify and mitigate errors affecting the accuracy of scan rate data used in the calculation of the Reporting ACE for each Balancing Authority Area. Both of these requirements are specific to identifying missing or invalid data plus scan rates not just the quality of the Real-time data.

The SER Phase I SDT will communicate the SR Phase II SAR DT regarding Requirement R4 and R6 of BAL-005-1 to determine if there is opportunity for revisions to TOP-010-1(i) R2 that would satisfy the missing or invalid data plus scan rates and if there is that opportunity, then Requirements R4 and R6 of BAL-005-1 may be able to be looked at for retirement within the project or in a future project.

INT-009-2.1, Requirement R2: This requirement can be retired under Paragraph 81 criteria, as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7.

PRC-004-5(i), Requirement R4: Removing this requirement from the standard does not preclude entities from conducting any and all investigative actions necessary. Accountability of an entity’s rigor and due diligence will be evident in compliance with the other Standard Requirements.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

A. BPA appreciates the opportunity to comment to the NERC Standards Effectiveness Review (SER) team on the path forward specifically concerning MOD-001-2 and the associated MOD standards (MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a, MOD-030-3.) BPA does not support the recommendation that NERC withdraw the February 10, 2014 petition to FERC related to MOD-001-2. Although NAESB completed the WEQ-023 Modeling Business Practice Standards which was based on a request from NERC to NAESB to address changes to the NERC MOD-001-2 Reliability Standards not yet ratified by FERC, FERC has not ratified the NAESB BPs. BPA supports the overall effort to migrate the commercial and business aspects of the NERC MOD Reliability Standards into corresponding NAESB Business Practice Standards, a position BPA filed on 09/26/16 in response to the FERC Notice of Proposed Rulemaking (156 FERC ¶ 61,055). In that NOPR, FERC makes clear that the status of the NAESB WEQ-023 Modeling standards and the NERC MOD-001-2 standards are now intertwined. Both are under consideration as part of FERC’s overall inquiry into ATC calculations. This includes Docket No. RM14-7-000, dealing with the original February 10, 2014 petition, as well as a related inquiry into ATC from Docket No. AD15-5-000. BPA recommends FERC address the overall ATC topic currently pending these dockets. FERC guidance on the overall direction of ATC standards is overdue and essential before NERC and/or NAESB invest further resources into companion standards. Because only Regulated utilities fall under the purview of the NAESB business practices, BPA urges NERC to closely collaborate with NAESB so there is a joint recommendation moving forward to FERC if NERC intends to proceed with modifying its approach to the February 10, 2014 petition.

B. BPA disagrees with the retirement of INT-004-3.1. NAESB Business Practice Standard WEQ-004 version 3.1 and FERC Docket RM05-5-25 are pending FERC approval. Additionally, NAESB Business Practices are not enforceable. Finally, the Pseudo-Tie Coordination Reference Document is just that, a reference document, and also not enforceable.

C. BPA supports the retirement of all other requirements in scope.

Likes 0

Dislikes 0

Response

Thank you for your comments.

INT-004-3.1, Requirements R1, R2, R3: This standard may be retired since it satisfies Paragraph 81 Criteria ‘B6 – Commercial or Business Practice.’ Interchange scheduling and congestion are elements that impact transmission costs, rather than actual reliable management of the BES. Furthermore, the applicable entity for Requirements R1 and R2, the Purchasing-Selling Entity, has been removed from the list of NERC Functional Entities, supporting the market-based observations herein. R3 specifically refers to “Pseudo-Ties that are included in the NAESB Electric Industry Registry,” reinforcing the tie to NAESB WEQ Business Practice Standards.

MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a, MOD-030-3 and proposed MOD-001-2 – ATC/AFC, as well as tags (or eTags) are commercially-focused elements, facilitating interchange and balancing of interchange. The real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC’s statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where they stated, “NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system.” FERC acknowledged this in their March 15, 2015 order, where they stated, “we approve NERC’s proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules.”

Todd Bennett - Associated Electric Cooperative, Inc. - 1,3,5,6, Group Name AECl

Answer

Yes

Document Name

Comment

AECl supports the comments provided by NRECA.

Likes	0	
Dislikes	0	
Response		
Thank you for your comment. Please see responses to NRECA.		
Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF		
Answer	Yes	
Document Name		
Comment		
<p>Phase I calls for the full retirement of FAC-013-2, it is noted by the NSRF that the current NERC Project 2015-09 is proposing FAC-013-3. The NSRF asks whether FAC-013-3 needs to be referenced from the SAR for future handling, should the FAC-013 -2 retirement be successful.</p> <p>Similar situation with VAR-001-4.2 E.A. 15. The NSRF notes that VAR-001-5, which has been approved by the NERC Board of Trustees, contains E.A. 15 in Attachment 1. Does VAR-001-5 E.A.15 need to be referenced from the SAR for future handling, should the VAR-001-4.2 E.A. 15 retirement be successful?</p>		
Likes	1	OGE Energy - Oklahoma Gas and Electric Co., 6, Tay Sing
Dislikes	0	
Response		
<p>Thank you for your comments. The SDT will collaborate with the Project 2015-09 drafting team regarding FAC-013-3. EA 15 was retired from VAR-001-5, which became effective January 1, 2019.</p>		
Thomas Foltz - AEP - 3,5		
Answer	Yes	
Document Name		
Comment		
<p>AEP supports the work and overall recommendations of the Standards Drafting Team with the following qualifiers:</p> <p>AEP does not agree that PRC-004-5(i) R4 meets the drafting team’s “Evaluation Criteria for Retiring Reliability Standards Requirements”, as the declaration of “no cause found” is made only within this obligation (i.e. “is not redundant”). Regarding the reliability rationale, we would agree that not all investigative actions in and of themselves improve reliability, however the ability to track investigative actions over an extended period of time ensures more riguer is applied to the investigative progress.</p>		
Likes	0	
Dislikes	0	
Response		

Thank you for your comment. Retiring this requirement from the standard does not preclude entities from conducting any and all investigative actions necessary. Accountability of an entities rigor and due diligence will be evident in compliance with the other Standard Requirements.

PRC-004-5(i), Requirement R4: The Standard's purpose is to identify and correct the causes of Misoperations of Protection Systems for Bulk Electric System (BES) Elements. The Standard's Guideline and Technical Basis for R4, starting on Page 29, considers due diligence that an entity must make in determining the cause of a Protection System misoperation. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work. Removing a requirement does not preclude an entity from tracking over a period of time.

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer Yes

Document Name

Comment

On behalf of our City Light SMEs, there were no voiced concerns.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Larry Watt - Lakeland Electric - 1,3,5,6

Answer Yes

Document Name

Comment

We agree with the following comments submitted by TAPS:

We believe the justifications for the SAR's proposed retirements are well-explained. We also believe, however, that several additional requirements should be retired either as part of this SAR or in Phase 2, as set forth below.

COM-001-3 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, R12, and R13 (ALL)

Basic functionality. This should be part of the certification process for BAs, TOPs and RCs. For all other entities (DPs and GOs), it is not necessary to require communication to be proven as the RC, TOP or BA will assure that they can make contact with these entities, and all entities have internal and external Interpersonal Communications Capabilities. This Standard basically states to have primary and back up communications (a phone). In today's world, basic, daily functionality necessitates multiple avenues of communications such as a land line phone, a cell phone, text messaging, a radio, satellite phone, etc. This Standard is not necessary for reliability; it only enforces a compliance "gotcha" if a registered entity's primary communication system fails. There is not a reliability benefit from COM-001-3, just administrative burden. Communications are a basic function of every registered entity. The entire Standard should be retired.

COM-002-4 R3

R1 protocols cover all aspects of operating protocols. If communication is a reliability-related task, then training is covered in PER-005.

COM-002-4 R4

R4 and its subrequirements are a control and should not be an auditable item.

COM-002-4 R5, R6, R7

There should be no difference between an Operation Instruction under normal conditions and under Emergency conditions. R1 covers all Operating instructions. By imposing additional requirements on Operating Instructions that are issued during an emergency, R5, R6, and R7 make it necessary for entities to track whether each Operating Instruction was issued during an Emergency or during normal operations, in order to be able to demonstrate compliance. This administrative burden does not enhance reliability.

EOP-005-3 R3

Verify through NERC Certification program.

EOP-008-2 R2

Verify through NERC Certification program.

EOP-008-2 R3, R4

NERC Certified Operators can be addressed through Certification Program. R6 addresses Primary and Backup and can also address the sub-bullets in this Requirement. Sub-bullets of R4 can be addressed in R8.

EOP-010-1 R2

This is for situational awareness only and may be a mitigating feature of R1. If one K warning is not sent out, it becomes a non-compliance issue. This is also covered in EOP-011-1, R1.2.1.

EOP-010-1 R3.1

R3.1 is contained in R1. Per part 3.1, this will force the TOP to prove a negative if they did not receive any space weather information. Part 3.2 starts the mitigating processes for GMD events and part 3.3 concludes them. Part 3.1 is administrative in nature as alone, it does not accomplish anything; parts 3.2 and 3.3 mitigate the GMD. Recommend part 3.1 be retired. If not retired, part 3.1 should be modified to clearly state in the requirements or measures that proof of compliance is to show the steps only and entities are not required to prove a null set of data.

EOP-011-1 R1 subparts

R1.1 does not enhance or enforce reliability; it is only an auditable item. R1.2.2, R1.2.3, R1.2.4, R1.2.5, and R1.2.6 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan, only. R1 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R2 subparts

R2.1 does not enhance or enforce reliability; it is only an auditable item. R2.2.3 and its parts and R2.2.4, R2.2.5, R2.2.6, R2.2.7, R2.2.8 and R2.2.9 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan. R2 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R4

This is common sense. We do not need a Requirement to state that we have a specific time to update something issued by the RC. The RC can simply state have an update back by a certain time. This becomes a time "gotcha" issue during an audit or self report. This does not support system reliability.

EOP-011-1 R5

This is in line with the justification for retiring R4, as this is also common sense. The RC will act immediately on all emergency notifications. The time frame of 30 minutes only become an auditable point and does not support reliability. If the requirement is not retired, at minimum the 30 minute criterion should be deleted.

EOP-011-1 R6

This is clearly stated in the Functional model under Real Time actions and does not need to be contained here; the RC will act immediately on all emergency notifications. Recommend retirement of this Requirement.

FAC-002-2 R2, R3, R4, R5

Inherent in R1.

FAC-003-4 R4

R4 is a notification process only, without the next step of clearing happening. This alone does not support reliability. The clearing of the encroaching vegetation does support reliability and is covered in R1, R2, and R6.

FAC-008-3 R1, R2, R3, R6

Generator Facility Ratings are not useful as they are often different from the capability determined through MOD-025. This Standard is usually based solely on the nameplate ratings of components that are covered by this Standard. Nameplate ratings become irrelevant with MOD-025-2, which captures the true capabilities of the asset. The TP will be notified of MOD-025-2 findings. If the RC wants to know the MOD-025-2 capabilities, then they can ask for it under IRO-010-2. The TOP can also request the same information under TOP-003-3.

IRO-001-4 R1

This is the basic functionality of an RC, as outlined in the Functional Model.

IRO-001-4 R2

Per the Functional Model, the BA, TOP, and GOP have reliability interactions with the RC, hence supporting a secure and stable reliable system. The DP does not receive instructions from the RC; rather, they receive information from the BA and TOP.

IRO-001-4 R3

This does not need to be a Requirement. The RC can simply ask whether the registered entity has the ability to accomplish the task. If the entity can't, the RC will take alternate actions.

IRO-002-5 R3

Requirement 2 already provides for two active paths. A NERC certification program can ensure that the paths are being used periodically.

IRO-008-2 R3

The RC's performance of the analysis is identified in R1. A separately enforceable requirement that the RC take the common-sense action of informing impacted entities is unnecessary.

IRO-008-2 R4

IRO-018-1 R2, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc) without a hard standard-based 30 minute compliance threshold. Candidate for NERC certification program.

IRO-008-2 R5

This requirement supports R2 and process can be verified through NERC Certification (process review).

IRO-010-2 R3

Real time data transmission involves telemetry for thousands of points scanned or updated every few seconds. Retaining evidence of providing this volume of data is burdensome.

MOD-033-1 R2

This requires demonstration of the negative and after the fact validation. This should be part of the Event Analysis process and not a NERC Requirement.

NUC-001-3 R9

Requirement is administrative as it only specifies what must be in the agreement. R9 can be moved to a Guidance document since R9's second bullet states "The Nuclear Plant Generator Operator and the Transmission Entity are responsible for ensuring all the R9 elements are addressed." An item can be addressed by stating that it is not applicable for the entity.

PER-003-1 R1, R2, R3 (ALL)

This Requirement is predicated on the NERC exam which is the responsibility of NERC and the PCGC, not a Registered Entity. Recommend this Standard be retired. Operators are trained on competencies. Competencies can be verified through the training Standards. Certifications should be verified through the NERC Certification program.

PER-004-2 R1

In addition to being redundant with PER-003-1 (which we also recommend be retired), this requirement is part of the Certification process and does not need to be within a Standard.

PER-004-2 R2

Already covered by IRO-009 R1/R2.

PER-005-2 R5, R6

Operations Support Personnel know their impact on reliability and the task list. The prep and training used for OSP and the trainers is better spent for their job duties in support of reliability.

PRC-002-2 R1-R12 (ALL)

Disturbance monitoring is for post-event analysis and does not have direct impact on reliability. Guidelines and best business practices are sufficient to help improve accuracy and coordination. This very granular and prescriptive standard is not needed.

PRC-004-5(i) R2, R3, R5

Only R1 and R6 are required in order to support system reliability and stability. This Standard has too many time frames within each requirement and only provides a compliance gotcha if not followed. Time frames don't support reliability. The intent of this Standard is if you have a mis-operation that you notify everyone involved and fix it so it (hopefully) doesn't happen again.

PRC-005-6 R5

For PRC-005 Unresolved Maintenance Items (UMIs) are a low-volume and low-risk population with little to zero proven actual risk. We are not aware of any events where UMIs were cited as a primary or contributory cause to a BES outage in the Events Analysis program. Given the low volume of actual documented risk impacts and the low volume of self-logs or spreadsheet Notice of Penalty (SNOPs and NOPs), the UMI definition and requirement should be retired. If not retired, the UMIs should be modified to clearly state in the requirements or measures that compliance by exception is allowed and that regulated entities are not required to prove a null set of data.

TOP-001-4 R1

The basic functionality of a TOP is to operate or direct operation of equipment to maintain reliability. COM-002-4 clearly indicates that the TOP will be using Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R2, R4-R7

Please see responses re IRO-001-4 for retirement justification.

TOP-001-4 R3

Requirement language is poorly worded because it is not specifically tied to Operating Instructions issued under TOP-001-4 R1 (i.e., Operating Instructions issued to maintain reliability). As such, every entity in R3 must maintain a list of every Operating Instruction issued or received, whether the OI was issued for reliability or not. The NERC Glossary of Terms definition for Operating Instruction pulls in all orders given to others to change the state of a BES Element, which means all planned switching orders issued by the operator, not just OIs issued for reliability. This requirement would be improved by both limiting the duration Operating Instruction evidence needs to be retained and clarifying that the requirement applies only to OIs from TOP-001-4 R1. The RSAW for TOP-001-4 R3 must also be corrected because it directs the audit to begin with the list of "all" Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R8

Covered by EOP-011 R5 or can be merged with same Requirement. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R9

EMS quality codes suffice for notifications of RTU outages and were accepted by the RRO. However, the Regional Entity does not agree. So now unplanned outages need to be tracked for 30 minute overages for reporting. This detracts from reliability and does not enhance reliability, especially when these outages are already indicated by quality codes. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R13

TOP-010-1 R3, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc.) without a hard Requirement-based 30-minute compliance threshold. Candidate for NERC Certification program.

TOP-001-4 R21

R20 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-001-4 R24

R23 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-002-4 R3

The TOP's performance of the analysis is required by R1. A separately enforceable requirement that the TOP take the common-sense action of informing impacted entities is unnecessary. Could be verified through NERC certification.

TOP-002-4 R4, R5, and R7

Daily Operating Plans are not needed for BAs. Generation dispatch information can be gathered and shared through data provision requirements.

TPL-007-1 R1

Administrative.

VAR-001-4.1 R1

Duplicative of FAC-014.

VAR-001-4.2 R5

All of R5 appears to be administrative and a common-sense operations item. All entities keep impedance and tap information on their transformers. There isn't any reason to withhold information if requested, so a mandatory standard backed by sanctions to provide information within 30 days is simply an administrative clock. It's wasteful of both entity and regulator resources.

VAR-002-4.1 R3

Duplicative of other standards requiring data provision. There is no justification for the 30 minute timing requirement; if a timing requirement is retained, it is not a good reliability practice to require notification "within 30 minutes," but only if status is not restored within 30 minutes.

VAR-002-4.1 R4

Duplicative of other standards requiring data provision. There is no justification for a 30 minute time limit and this becomes a compliance trap.

VAR-002-4.1 R5

Duplicative of other standards requiring data provision.

Likes 0

Dislikes 0

Response

Thank you for your comments. Please see responses to TAPS comments. The additional requirements suggested are not identified within the SAR, and thus are out of scope for this project. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

Patricia Boody - Lakeland Electric - 1,3,5,6

Answer

Yes

Document Name

Comment

I support the comments submitted by TAPS and the FMPA.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see responses to TAPS.

Joe McClung - JEA - 1,3,5 - FRCC

Answer

Yes

Document Name

Comment

JEA appreciates the effort of the SER Team and agrees with the recommendations and rationales to retire the proposed requirements with the exception of two comments:

1. JEA disagrees with the rationale for the retirement of PRC-004-5(i) R4. This requirement applies only when the cause of a Misoperation has not been determined and requires the TO/GO/DP to perform investigative actions every two quarters until a cause is identified OR a declaration is made that no cause was identified.

a) The SAR states, "Requirement R4 acts as a control to support compliance with requirements R1 & R3." However, R4 is not a control for determining "whether its Protection System component(s) caused a Misoperation", but is the next step if the cause of a Misoperation, "for a Misoperation identified in accordance with Requirement R1 or R3", has not been determined.

b) The SAR also states, "It is in the best interest of the entity to continue to investigate and detect whether its Protection System components caused a mis-operation", but this is more than just in the best interest of the entity. R1 requires the entity to "identify whether its Protection System component(s) caused a Misoperation."

c) The SAR also states, "However, if an entity is unable to determine the cause, further investigation(s) using the same event data are unlikely to lead to identification of the cause." But, investigative actions do improve reliability if they result in the identification of a cause. If no cause is identified, the TO/GO/DP can simply declare that no cause was identified, thereby satisfying the requirement.

There may be valid reasons for retiring this requirement (milestone tracking doesn't improve reliability, this is a typical best practice, etc.), but the reasons listed above are not valid based upon the current standard language.

2. JEA disagrees with the rationale for the retirements of COM-002-4 R2, EOP-005-3 R8, and EOP-006-3 R7. These requirements are not duplicated in the current version of PER-005-2. PER-005-2 R1.1 allows for the RC, BA, and TOP to create a list of BES "company-specific Real-time reliability-related tasks based on a defined and documented methodology", but, if specific tasks are intended, then they should be stated directly. It's implied that these reliability-related tasks would include communication protocols and system restoration, but PER-005-2 only requires a methodology to be followed rather than setting forth explicit minimum competency requirements which is what the requirements proposed for retirement include.

Furthermore, there is clear distinction between the "initial training" of COM-002-4 R2 which occurs "prior to that individual operator issuing an Operating Instruction" and the continuous learning of PER-005-2.

Likes 0

Dislikes 0

Response

Thank you for your comments.

PRC-004-5(i) Requirement R4:

Removing the requirement from the standard does not preclude entities from conducting any and all investigative actions necessary. The rigor and due diligence of the actions taken to identify the cause of Misoperations will be evident in compliance with the other Standard Requirements. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

EOP-005-3, Requirement R8 and EOP-006-3 Requirement R7:

The SER SDT agrees that Requirement R8 of EOP-005-3 be retained. The SER SDT also believes that Requirement R7 of EOP-006-3 be maintained. The PER-005 standard entails training processes, however it does not specifically provide for system restoration training.

In PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was, in part, based on the existence of former Requirement R10 in EOP-005-2 (Requirement R8 of EOP-005-3) and Requirement R9 in EOP-006-2 (Requirement R7 of EOP-006-3). If Requirement R8 in EOP-005-3 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any of the standards.

The SDT team believes a specific requirement for system restoration training should be maintained, because while a system shutdown is low probability, it could have a high impact if not done properly. The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to system restoration training; and, if there is that opportunity, then Requirement R8 of EOP-005-3 and Requirement R7 in EOP-006-3 may be able to be looked at for retirement within that project or in a future project. If certain elements are essential within an entity's training program, those elements should be explicitly identified in a future version of PER-005 prior to retiring from other standards; such as those identified in EOP-005 and EOP-006.

COM-002-4 Requirement R2:

While training on communications protocols would fall into an entity's systematic approach to training, the requirements do not explicitly mandate training on communications protocols. It is essential for all operators to have a common level of understanding and be trained in three-part communication. During development of COM-002-4, it was determined that because PER-005 would not meet the NERC Board of Trustees November 7, 2013 Resolution to mandate training, that SDT included a requirement to conduct initial training in order to ensure that a baseline of training is complete before an individual is placed in a position to use the communications protocols. Requiring initial training is not overly burdensome to an entity and any subsequent training can be covered in PER-005 or through the operator feedback loop as determined by the entity.

The SER Phase I SDT will communicate with the SER Phase II SAR DT regarding Requirement R2 of COM-002-4 to determine if there is opportunity for revisions to PER-005-2 that would satisfy the training requirements specific to training on communications protocols; and, if there is that opportunity, then Requirement R2 of COM-002-4 may be able to be looked at for retirement within that project or in a future project.

Douglas Johnson - American Transmission Company, LLC - 1

Answer	Yes
Document Name	
Comment	

COM-002-4 R2 –Requires initial training on communication protocols; NERC proposes that R2 be retired as this topic should be covered in a PER-005-2 compliant Systematic Approach to Training program. Training on ATC communication protocols and tasks to issue and receive op instructions are part of the SCO initial training program. As such, we agree with retirement of COM-002-4 R2.

EOP-005-3 R8 – requires annual system restoration training; NERC proposes that R8 be retired as this topic should be covered in a PER-005-2 compliant Systematic Approach to Training program. Agree as we have three tasks in regards to PSR in the SCO initial training program. Our continuing education program also has annual PSR training (classroom and DTS). As such, we agree with retirement of EOP-005-3 R8.

TOP-001-4 R16-NERC Certified Operators can be addressed through Certification Program and authority is part of the qualification. PER-005-2 training supports this. As such, we agree with retirement of TOP-001-4 R16.

TOP-001-4 R19: the language used to describe how this is managed is through requirements in TOP-003-3 and TOP-002-4. As such, we agree with retirement of TOP-001-4 R19.

VAR-001-4 R2: TOP-001 and TOP-002 require the Transmission Operator to identify System Operating Limit exceedances during real-time and next-day conditions, respectively. System Operating Limits include voltage limits and management of reactive resources as described in VAR-001-4 R2 is fulfilled by acting according to the TOP standards. As such, we agree with retirement of VAR-001-4 R2.

VAR-001-4 R3: The directive in VAR-001-4.2 R3 is fulfilled as a result of compliance with TOP-001-3 R1, R12 and R14; in that the obligation in R1 to maintain the reliability of its operator area is unachievable by the TO if it does not operate devices to regulate voltage and reactive flow; additionally, TOP-001 R 12 and R14 cover addressing System Operating Limits and Interconnection Reliability Operating Limits, where the definition includes voltage stability ratings and system voltage limits. As such, we agree with retirement of VAR-001-4 R3.

Likes 0

Dislikes 0

Response

Thank you for your comments and support. However, based on the comments received and the SAR SDT's analysis, the SAR SDT does not intend to propose the following Reliability Standard Requirements for retirement: EOP-005-3, Requirement R8; EOP-006-3, Requirement R7; COM-002-4, Requirement R2; TOP-001-4, Requirement R16; and VAR-001-5, Requirement R3.

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Patti Metro - National Rural Electric Cooperative Association - 3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glenn Barry - Los Angeles Department of Water and Power - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana McMahon - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wendy Center - U.S. Bureau of Reclamation - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruth Miller - Exelon - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - 4 - NA - Not Applicable

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon McCormick - Florida Municipal Power Agency - 3,4,5,6 - FRCC, Group Name FMPA

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

William Sanders - Lower Colorado River Authority - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Do you agree that NERC should proceed with this project?

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC

Answer Yes

Document Name

Comment

Definitely.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern Company believes NERC should proceed with this project in an effort to identify those current reliability standards that either are duplicative in nature or have little to no impact on improving reliability of the system.

Likes 0

Dislikes 0

Response

Thank you for your support.

Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs

Answer Yes

Document Name

Comment

PSEG enthusiastically supports NERC for seeking to eliminate and modify standards requirements to improve their effectiveness and efficiency.

Likes 0

Dislikes 0

Response

Thank you for your support.

Patricia Boody - Lakeland Electric - 1,3,5,6

Answer Yes

Document Name

Comment

I support the comments submitted by TAPS and the FMPA.

Likes 0

Dislikes 0

Response

Thank you for your support.

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

While we disagree with some of the recommendations of the SDT, we agree that the project has merit, and should proceed.

Likes 0

Dislikes 0

Response

Thank you for your support.

Answer Yes

Document Name

Comment

FMPA agrees with the following comments submitted by TAPS:

We believe the justifications for the SAR's proposed retirements are well-explained. We also believe, however, that several additional requirements should be retired either as part of this SAR or in Phase 2, as set forth below.

COM-001-3 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, R12, and R13 (ALL)

Basic functionality. This should be part of the certification process for BAs, TOPs and RCs. For all other entities (DPs and GOs), it is not necessary to require communication to be proven as the RC, TOP or BA will assure that they can make contact with these entities, and all entities have internal and external Interpersonal Communications Capabilities. This Standard basically states to have primary and back up communications (a phone). In today's world, basic, daily functionality necessitates multiple avenues of communications such as a land line phone, a cell phone, text messaging, a radio, satellite phone, etc. This Standard is not necessary for reliability; it only enforces a compliance "gotcha" if a registered entity's primary communication system fails. There is not a reliability benefit from COM-001-3, just administrative burden. Communications are a basic function of every registered entity. The entire Standard should be retired.

COM-002-4 R3

R1 protocols cover all aspects of operating protocols. If communication is a reliability-related task, then training is covered in PER-005.

COM-002-4 R4

R4 and its subrequirements are a control and should not be an auditable item.

COM-002-4 R5, R6, R7

There should be no difference between an Operation Instruction under normal conditions and under Emergency conditions. R1 covers all Operating instructions. By imposing additional requirements on Operating Instructions that are issued during an emergency, R5, R6, and R7 make it necessary for entities to track whether each Operating Instruction was issued during an Emergency or during normal operations, in order to be able to demonstrate compliance. This administrative burden does not enhance reliability.

EOP-005-3 R3

Verify through NERC Certification program.

EOP-008-2 R2

Verify through NERC Certification program.

EOP-008-2 R3, R4

NERC Certified Operators can be addressed through Certification Program. R6 addresses Primary and Backup and can also address the sub-bullets in this Requirement. Sub-bullets of R4 can be addressed in R8.

EOP-010-1 R2

This is for situational awareness only and may be a mitigating feature of R1. If one K warning is not sent out, it becomes a non-compliance issue. This is also covered in EOP-011-1, R1.2.1.

EOP-010-1 R3.1

R3.1 is contained in R1. Per part 3.1, this will force the TOP to prove a negative if they did not receive any space weather information. Part 3.2 starts the mitigating processes for GMD events and part 3.3 concludes them. Part 3.1 is administrative in nature as alone, it does not accomplish anything; parts 3.2 and 3.3 mitigate the GMD. Recommend part 3.1 be retired. If not retired, part 3.1 should be modified to clearly state in the requirements or measures that proof of compliance is to show the steps only and entities are not required to prove a null set of data.

EOP-011-1 R1 subparts

R1.1 does not enhance or enforce reliability; it is only an auditable item. R1.2.2, R1.2.3, R1.2.4, R1.2.5, and R1.2.6 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan, only. R1 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R2 subparts

R2.1 does not enhance or enforce reliability; it is only an auditable item. R2.2.3 and its parts and R2.2.4, R2.2.5, R2.2.6, R2.2.7, R2.2.8 and R2.2.9 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan. R2 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R4

This is common sense. We do not need a Requirement to state that we have a specific time to update something issued by the RC. The RC can simply state have an update back by a certain time. This becomes a time "gotcha" issue during an audit or self report. This does not support system reliability.

EOP-011-1 R5

This is in line with the justification for retiring R4, as this is also common sense. The RC will act immediately on all emergency notifications. The time frame of 30 minutes only become an auditable point and does not support reliability. If the requirement is not retired, at minimum the 30 minute criterion should be deleted.

EOP-011-1 R6

This is clearly stated in the Functional model under Real Time actions and does not need to be contained here; the RC will act immediately on all emergency notifications. Recommend retirement of this Requirement.

FAC-002-2 R2, R3, R4, R5

Inherent in R1.

FAC-003-4 R4

R4 is a notification process only, without the next step of clearing happening. This alone does not support reliability. The clearing of the encroaching vegetation does support reliability and is covered in R1, R2, and R6.

FAC-008-3 R1, R2, R3, R6

Generator Facility Ratings are not useful as they are often different from the capability determined through MOD-025. This Standard is usually based solely on the nameplate ratings of components that are covered by this Standard. Nameplate ratings become irrelevant with MOD-025-2, which captures the true capabilities of the asset. The TP will be notified of MOD-025-2 findings. If the RC wants to know the MOD-025-2 capabilities, then they can ask for it under IRO-010-2. The TOP can also request the same information under TOP-003-3.

IRO-001-4 R1

This is the basic functionality of an RC, as outlined in the Functional Model.

IRO-001-4 R2

Per the Functional Model, the BA, TOP, and GOP have reliability interactions with the RC, hence supporting a secure and stable reliable system. The DP does not receive instructions from the RC; rather, they receive information from the BA and TOP.

IRO-001-4 R3

This does not need to be a Requirement. The RC can simply ask whether the registered entity has the ability to accomplish the task. If the entity can't, the RC will take alternate actions.

IRO-002-5 R3

Requirement 2 already provides for two active paths. A NERC certification program can ensure that the paths are being used periodically.

IRO-008-2 R3

The RC's performance of the analysis is identified in R1. A separately enforceable requirement that the RC take the common-sense action of informing impacted entities is unnecessary.

IRO-008-2 R4

IRO-018-1 R2, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc) without a hard standard-based 30 minute compliance threshold. Candidate for NERC certification program.

IRO-008-2 R5

This requirement supports R2 and process can be verified through NERC Certification (process review).

IRO-010-2 R3

Real time data transmission involves telemetry for thousands of points scanned or updated every few seconds. Retaining evidence of providing this volume of data is burdensome.

MOD-033-1 R2

This requires demonstration of the negative and after the fact validation. This should be part of the Event Analysis process and not a NERC Requirement.

NUC-001-3 R9

Requirement is administrative as it only specifies what must be in the agreement. R9 can be moved to a Guidance document since R9's second bullet states "The Nuclear Plant Generator Operator and the Transmission Entity are responsible for ensuring all the R9 elements are addressed." An item can be addressed by stating that it is not applicable for the entity.

PER-003-1 R1, R2, R3 (ALL)

This Requirement is predicated on the NERC exam which is the responsibility of NERC and the PCGC, not a Registered Entity. Recommend this Standard be retired. Operators are trained on competencies. Competencies can be verified through the training Standards. Certifications should be verified through the NERC Certification program.

PER-004-2 R1

In addition to being redundant with PER-003-1 (which we also recommend be retired), this requirement is part of the Certification process and does not need to be within a Standard.

PER-004-2 R2

Already covered by IRO-009 R1/R2.

PER-005-2 R5, R6

Operations Support Personnel know their impact on reliability and the task list. The prep and training used for OSP and the trainers is better spent for their job duties in support of reliability.

PRC-002-2 R1-R12 (ALL)

Disturbance monitoring is for post-event analysis and does not have direct impact on reliability. Guidelines and best business practices are sufficient to help improve accuracy and coordination. This very granular and prescriptive standard is not needed.

PRC-004-5(i) R2, R3, R5

Only R1 and R6 are required in order to support system reliability and stability. This Standard has too many time frames within each requirement and only provides a compliance gotcha if not followed. Time frames don't support reliability. The intent of this Standard is if you have a mis-operation that you notify everyone involved and fix it so it (hopefully) doesn't happen again.

PRC-005-6 R5

For PRC-005 Unresolved Maintenance Items (UMIs) are a low-volume and low-risk population with little to zero proven actual risk. We are not aware of any events where UMIs were cited as a primary or contributory cause to a BES outage in the Events Analysis program. Given the low volume of actual documented risk impacts and the low volume of self-logs or spreadsheet Notice of Penalty (SNOPs and NOPs), the UMI definition and requirement should be retired. If not retired, the UMIs should be modified to clearly state in the requirements or measures that compliance by exception is allowed and that regulated entities are not required to prove a null set of data.

TOP-001-4 R1

The basic functionality of a TOP is to operate or direct operation of equipment to maintain reliability. COM-002-4 clearly indicates that the TOP will be using Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R2, R4-R7

Please see responses re IRO-001-4 for retirement justification.

TOP-001-4 R3

Requirement language is poorly worded because it is not specifically tied to Operating Instructions issued under TOP-001-4 R1 (i.e., Operating Instructions issued to maintain reliability). As such, every entity in R3 must maintain a list of every Operating Instruction issued or received, whether the OI was issued for reliability or not. The NERC Glossary of Terms definition for Operating Instruction pulls in all orders given to others to change the state of a BES Element, which means all planned switching orders issued by the operator, not just OIs issued for reliability. This requirement would be improved by both limiting the duration Operating Instruction evidence needs to be retained and clarifying that the requirement applies only to OIs from TOP-001-4 R1. The RSAW for TOP-001-4 R3 must also be corrected because it directs the audit to begin with the list of "all" Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R8

Covered by EOP-011 R5 or can be merged with same Requirement. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R9

EMS quality codes suffice for notifications of RTU outages and were accepted by the RRO. However, the Regional Entity does not agree. So now unplanned outages need to be tracked for 30 minute overages for reporting. This detracts from reliability and does not enhance reliability, especially when these outages are already indicated by quality codes. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R13

TOP-010-1 R3, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc.) without a hard Requirement-based 30-minute compliance threshold. Candidate for NERC Certification program.

TOP-001-4 R21

R20 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-001-4 R24

R23 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-002-4 R3

The TOP's performance of the analysis is required by R1. A separately enforceable requirement that the TOP take the common-sense action of informing impacted entities is unnecessary. Could be verified through NERC certification.

TOP-002-4 R4, R5, and R7

Daily Operating Plans are not needed for BAs. Generation dispatch information can be gathered and shared through data provision requirements.

TPL-007-1 R1

Administrative.

VAR-001-4.1 R1

Duplicative of FAC-014.

VAR-001-4.2 R5

All of R5 appears to be administrative and a common-sense operations item. All entities keep impedance and tap information on their transformers. There isn't any reason to withhold information if requested, so a mandatory standard backed by sanctions to provide information within 30 days is simply an administrative clock. It's wasteful of both entity and regulator resources.

VAR-002-4.1 R3

Duplicative of other standards requiring data provision. There is no justification for the 30 minute timing requirement; if a timing requirement is retained, it is not a good reliability practice to require notification "within 30 minutes," but only if status is not restored within 30 minutes.

VAR-002-4.1 R4

Duplicative of other standards requiring data provision. There is no justification for a 30 minute time limit and this becomes a compliance trap.

VAR-002-4.1 R5

Duplicative of other standards requiring data provision.

Likes 0

Dislikes 0

Response Thank you for your support. The additional requirements suggested are not identified within the SAR, and thus are out-of-scope for this project. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

Thank you for your comments. Please see responses to comments provided by TAPS. The additional requirements suggested are not identified within the SAR, and thus are out-of-scope for this project. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

Rebecca Baldwin - Transmission Access Policy Study Group - 4 - NA - Not Applicable

Answer

Yes

Document Name

Comment

TAPS appreciates the work of the Standards Efficiency Review Teams in developing this SAR. We believe the justifications for the SAR's proposed retirements are well-explained. We also believe, however, that several additional requirements should be retired either as part of this SAR or in Phase 2, as set forth below.

COM-001-3 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, R12, and R13 (ALL)

Basic functionality. This should be part of the certification process for BAs, TOPs and RCs. For all other entities (DPs and GOs), it is not necessary to require communication to be proven as the RC, TOP or BA will assure that they can make contact with these entities, and all entities have internal and external Interpersonal Communications Capabilities. This Standard basically states to have primary and back up communications (a phone). In today's world, basic, daily functionality necessitates multiple avenues of communications such as a land line phone, a cell phone, text messaging, a radio, satellite phone, etc. This Standard is not necessary for reliability; it only enforces a compliance "gotcha" if a registered entity's primary communication system fails. There is not a reliability benefit from COM-001-3, just administrative burden. Communications are a basic function of every registered entity. The entire Standard should be retired.

COM-002-4 R3

R1 protocols cover all aspects of operating protocols. If communication is a reliability-related task, then training is covered in PER-005.

COM-002-4 R4

R4 and its subrequirements are a control and should not be an auditable item.

COM-002-4 R5, R6, R7

There should be no difference between an Operation Instruction under normal conditions and under Emergency conditions. R1 covers all Operating instructions. By imposing additional requirements on Operating Instructions that are issued during an emergency, R5, R6, and R7 make it necessary for entities to track whether each Operating Instruction was issued during an Emergency or during normal operations, in order to be able to demonstrate compliance. This administrative burden does not enhance reliability.

EOP-005-3 R3

Verify through NERC Certification program.

EOP-008-2 R2

Verify through NERC Certification program.

EOP-008-2 R3, R4

NERC Certified Operators can be addressed through Certification Program. R6 addresses Primary and Backup and can also address the sub-bullets in this Requirement. Sub-bullets of R4 can be addressed in R8.

EOP-010-1 R2

This is for situational awareness only and may be a mitigating feature of R1. If one K warning is not sent out, it becomes a non-compliance issue. This is also covered in EOP-011-1, R1.2.1.

EOP-010-1 R3.1

R3.1 is contained in R1. Per part 3.1, this will force the TOP to prove a negative if they did not receive any space weather information. Part 3.2 starts the mitigating processes for GMD events and part 3.3 concludes them. Part 3.1 is administrative in nature as alone, it does not accomplish anything; parts 3.2 and 3.3 mitigate the GMD. Recommend part 3.1 be retired. If not retired, part 3.1 should be modified to clearly state in the requirements or measures that proof of compliance is to show the steps only and entities are not required to prove a null set of data.

EOP-011-1 R1 subparts

R1.1 does not enhance or enforce reliability; it is only an auditable item. R1.2.2, R1.2.3, R1.2.4, R1.2.5, and R1.2.6 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan, only. R1 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R2 subparts

R2.1 does not enhance or enforce reliability; it is only an auditable item. R2.2.3 and its parts and R2.2.4, R2.2.5, R2.2.6, R2.2.7, R2.2.8 and R2.2.9 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan. R2 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R4

This is common sense. We do not need a Requirement to state that we have a specific time to update something issued by the RC. The RC can simply state have an update back by a certain time. This becomes a time "gotcha" issue during an audit or self report. This does not support system reliability.

EOP-011-1 R5

This is in line with the justification for retiring R4, as this is also common sense. The RC will act immediately on all emergency notifications. The time frame of 30 minutes only become an auditable point and does not support reliability. If the requirement is not retired, at minimum the 30 minute criterion should be deleted.

EOP-011-1 R6

This is clearly stated in the Functional model under Real Time actions and does not need to be contained here; the RC will act immediately on all emergency notifications. Recommend retirement of this Requirement.

FAC-002-2 R2, R3, R4, R5

Inherent in R1.

FAC-003-4 R4

R4 is a notification process only, without the next step of clearing happening. This alone does not support reliability. The clearing of the encroaching vegetation does support reliability and is covered in R1, R2, and R6.

FAC-008-3 R1, R2, R3, R6

Generator Facility Ratings are not useful as they are often different from the capability determined through MOD-025. This Standard is usually based solely on the nameplate ratings of components that are covered by this Standard. Nameplate ratings become irrelevant with MOD-025-2, which

captures the true capabilities of the asset. The TP will be notified of MOD-025-2 findings. If the RC wants to know the MOD-025-2 capabilities, then they can ask for it under IRO-010-2. The TOP can also request the same information under TOP-003-3.

IRO-001-4 R1

This is the basic functionality of an RC, as outlined in the Functional Model.

IRO-001-4 R2

Per the Functional Model, the BA, TOP, and GOP have reliability interactions with the RC, hence supporting a secure and stable reliable system. The DP does not receive instructions from the RC; rather, they receive information from the BA and TOP.

IRO-001-4 R3

This does not need to be a Requirement. The RC can simply ask whether the registered entity has the ability to accomplish the task. If the entity can't, the RC will take alternate actions.

IRO-002-5 R3

Requirement 2 already provides for two active paths. A NERC certification program can ensure that the paths are being used periodically.

IRO-008-2 R3

The RC's performance of the analysis is identified in R1. A separately enforceable requirement that the RC take the common-sense action of informing impacted entities is unnecessary.

IRO-008-2 R4

IRO-018-1 R2, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc) without a hard standard-based 30 minute compliance threshold. Candidate for NERC certification program.

IRO-008-2 R5

This requirement supports R2 and process can be verified through NERC Certification (process review).

IRO-010-2 R3

Real time data transmission involves telemetry for thousands of points scanned or updated every few seconds. Retaining evidence of providing this volume of data is burdensome.

MOD-033-1 R2

This requires demonstration of the negative and after the fact validation. This should be part of the Event Analysis process and not a NERC Requirement.

NUC-001-3 R9

Requirement is administrative as it only specifies what must be in the agreement. R9 can be moved to a Guidance document since R9's second bullet states "The Nuclear Plant Generator Operator and the Transmission Entity are responsible for ensuring all the R9 elements are addressed." An item can be addressed by stating that it is not applicable for the entity.

PER-003-1 R1, R2, R3 (ALL)

This Requirement is predicated on the NERC exam which is the responsibility of NERC and the PCGC, not a Registered Entity. Recommend this Standard be retired. Operators are trained on competencies. Competencies can be verified through the training Standards. Certifications should be verified through the NERC Certification program.

PER-004-2 R1

In addition to being redundant with PER-003-1 (which we also recommend be retired), this requirement is part of the Certification process and does not need to be within a Standard.

PER-004-2 R2

Already covered by IRO-009 R1/R2.

PER-005-2 R5, R6

Operations Support Personnel know their impact on reliability and the task list. The prep and training used for OSP and the trainers is better spent for their job duties in support of reliability.

PRC-002-2 R1-R12 (ALL)

Disturbance monitoring is for post-event analysis and does not have direct impact on reliability. Guidelines and best business practices are sufficient to help improve accuracy and coordination. This very granular and prescriptive standard is not needed.

PRC-004-5(i) R2, R3, R5

Only R1 and R6 are required in order to support system reliability and stability. This Standard has too many time frames within each requirement and only provides a compliance gotcha if not followed. Time frames don't support reliability. The intent of this Standard is if you have a mis-operation that you notify everyone involved and fix it so it (hopefully) doesn't happen again.

PRC-005-6 R5

For PRC-005 Unresolved Maintenance Items (UMIs) are a low-volume and low-risk population with little to zero proven actual risk. We are not aware of any events where UMIs were cited as a primary or contributory cause to a BES outage in the Events Analysis program. Given the low volume of actual documented risk impacts and the low volume of self-logs or spreadsheet Notice of Penalty (SNOPs and NOPs), the UMI definition and requirement should be retired. If not retired, the UMIs should be modified to clearly state in the requirements or measures that compliance by exception is allowed and that regulated entities are not required to prove a null set of data.

TOP-001-4 R1

The basic functionality of a TOP is to operate or direct operation of equipment to maintain reliability. COM-002-4 clearly indicates that the TOP will be using Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R2, R4-R7

Please see responses re IRO-001-4 for retirement justification.

TOP-001-4 R3

Requirement language is poorly worded because it is not specifically tied to Operating Instructions issued under TOP-001-4 R1 (i.e., Operating Instructions issued to maintain reliability). As such, every entity in R3 must maintain a list of every Operating Instruction issued or received, whether the OI was issued for reliability or not. The NERC Glossary of Terms definition for Operating Instruction pulls in all orders given to others to change the state of a BES Element, which means all planned switching orders issued by the operator, not just OIs issued for reliability. This requirement would be improved by both limiting the duration Operating Instruction evidence needs to be retained and clarifying that the requirement applies only to OIs from TOP-001-4 R1. The RSAW for TOP-001-4 R3 must also be corrected because it directs the audit to begin with the list of "all" Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R8

Covered by EOP-011 R5 or can be merged with same Requirement. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R9

EMS quality codes suffice for notifications of RTU outages and were accepted by the RRO. However, the Regional Entity does not agree. So now unplanned outages need to be tracked for 30 minute overages for reporting. This detracts from reliability and does not enhance reliability, especially when these outages are already indicated by quality codes. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R13

TOP-010-1 R3, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc.) without a hard Requirement-based 30-minute compliance threshold. Candidate for NERC Certification program.

TOP-001-4 R21

R20 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-001-4 R24

R23 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-002-4 R3

The TOP's performance of the analysis is required by R1. A separately enforceable requirement that the TOP take the common-sense action of informing impacted entities is unnecessary. Could be verified through NERC certification.

TOP-002-4 R4, R5, and R7

Daily Operating Plans are not needed for BAs. Generation dispatch information can be gathered and shared through data provision requirements.

TPL-007-1 R1

Administrative.

VAR-001-4.1 R1

Duplicative of FAC-014.

VAR-001-4.2 R5

All of R5 appears to be administrative and a common-sense operations item. All entities keep impedance and tap information on their transformers. There isn't any reason to withhold information if requested, so a mandatory standard backed by sanctions to provide information within 30 days is simply an administrative clock. It's wasteful of both entity and regulator resources.

VAR-002-4.1 R3

Duplicative of other standards requiring data provision. There is no justification for the 30 minute timing requirement; if a timing requirement is retained, it is not a good reliability practice to require notification "within 30 minutes," but only if status is not restored within 30 minutes.

VAR-002-4.1 R4

Duplicative of other standards requiring data provision. There is no justification for a 30 minute time limit and this becomes a compliance trap.

VAR-002-4.1 R5

Duplicative of other standards requiring data provision.

Likes 0

Dislikes 0

Response

Thank you for your comments. Please see responses provided to your comments in Question 1. The additional requirements suggested are not identified within the SAR, and thus are out-of-scope for this project. Your comment will be referred to the Standards Efficiency Review Team for consideration in a future phase of their work.

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer

Yes

Document Name

Comment

On behalf of our City Light SMEs, we believe these requirements should be retired.

Likes 0

Dislikes 0

Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Reclamation applauds this effort to retire duplicate and unnecessary requirements, and suggests a future project to consolidate additional requirements and evaluate the NERC Glossary of Terms for clarity and efficiency.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Todd Bennett - Associated Electric Cooperative, Inc. - 1,3,5,6, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments provided by NRECA.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
there is value examining the standards/requirements after 10 years of being enforceable. Data requests may be enforced by NERC Rules of Procedure Section 1600. A company's compliance culture is known now along with their internal controls. It makes sense to alleviate administrative burdens by a comprehensive review approach. We applaud NERC for this important effort.	
Likes	0
Dislikes	0

Response

Thank you for your support.

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

William Sanders - Lower Colorado River Authority - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Teresa Cantwell - Lower Colorado River Authority - 1,5**Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Thank you for your support.

Douglas Johnson - American Transmission Company, LLC - 1**Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Thank you for your support.

Leonard Kula - Independent Electricity System Operator - 2**Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Thank you for your support.

Joe McClung - JEA - 1,3,5 - FRCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Larry Watt - Lakeland Electric - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Ruth Miller - Exelon - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Devin Shines - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Diana McMahon - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,SERC, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Jesus Sammy Alcaraz - Imperial Irrigation District - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Glenn Barry - Los Angeles Department of Water and Power - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Patti Metro - National Rural Electric Cooperative Association - 3,4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Scott McGough - Georgia System Operations Corporation - 3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF, Group Name Consumers Energy Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.