

Meeting Agenda

Project 2019-01 Modifications to TPL-007-3

Standard Drafting Team

May 22, 2019 - 11:00 a.m. – Noon Eastern

Conference Call with Web Access

Administrative

Alison Oswald reviewed the NERC Antitrust Compliance Guidelines and noted that the meeting was public. Quorum was achieved, as eight of the nine standard drafting team (SDT) members were in attendance.

Agenda Items

1. CAP for Supplemental

The Chair, Emanuel Bernabeu, started the discussion reminding the team to stay on target in addressing the directives from the FERC order. The purpose of this conference call is to get prepared for the in-person meeting. There have been a few suggestions on how to address the corrective action plan (CAP) for supplemental which we will review and open for discussion.

One option is to add a CAP to the Supplemental and properly define the local enhancement (box size, field inside/outside, etc.). This would put more specificity around the supplemental like the benchmark already has. A concern with this approach is if the science is at a level to support it.

Second option is to add a CAP to the Supplemental and keep flexibility on how to apply it. More guidance could be written into Attachment 1 to help with conducting the supplemental making it slightly more defined but not restrictive.

Third option is to abandon the supplemental and make one event to study that has a CAP associated with it. This could be considered a deviation from the directives in FERC Order 851 and a more detailed discussion needs to be had during the in-person meeting.

Fourth, different (performance) criteria for the benchmark and supplemental event could be defined and those criteria would drive the CAP for each of the events.

The fifth suggestion is to have different timelines for benchmark and supplemental CAPs.

Finally, another point for the team to remember is that computer tools may not be ready to help industry conduct these analyses. Even if tools are available, industry is still new at conducting these assessments and might experience difficulties and uncertainty in validating the results.

The chair opened the topic for additional suggestion and discussion from the team. Multiple team members supported the opinion that we should not overthink the FERC order. The team should concentrate on what a CAP is and what a planner will do when a problem arises. There was initial support to have a lengthier discussion of the above options during the in-person meeting.

2. Case-by-case exception

The Chair, Emanuel Bernabeu, opened the discussion by asking if other NREC processes existed that the case-by-case exception process could be modelled after, or if this was going to be something new that NERC would need to handle. NERC Legal, Laruen Perotti, responded that there are some analogous processes currently in the BES exception and the BAL-003 processes, but this is a unique exception request.

The team discussed things that will be necessary in the standard language and the exception process. These included details on the timeline for industry to submit the exception request and the timeline for NERC to respond. The team also posed the question about appeals if an exception was denied. The idea was put to the team to think about if it would be necessary for an entity to have two paths for CAPs in case one was denied? NERC staff made the point that FERC approved the language for why exceptions would be necessary, beyond entity control, in previous versions of the standard. It would be helpful for those involved in the case-by-case exception process to have input from the SDT on situations that would fall into that category. It was also pointed out that an entity that receives a violation they do not agree with would have the ability to appeal their violation to enforcement staff.

3. Guidelines and Technical Basis (GTB)

Alison Oswald, NERC staff, reviewed with the larger SDT the meeting that the GTB sub-team had on Monday, May 20, 2019. It is the goal of the GTB sub-team to split the current GTB into two documents, Technical Rational and Implementation Guidance. The sub-team is reviewing the work of the Technical Rational for Reliability Standards (TRRS) team, who classified the current GTB into Technical Rational, Implementation Guidance, or sections that they were unable to determine at time of review. During the in-person meeting in June the GTB sub-team will review the work they have done to make this split and remove the GTB from the standard with the larger team. Any areas where the GTB sub-team cannot agree on the sections that were not classified by the TRRS team will be presented to the SDT for discussion. It is a goal of this project to complete the removal of the GTB from the standard and produce the two necessary documents to house the information previously contained in the GTB. In addition, this team can add to these two documents as they see fit based on the changes made during this project.

4. Review Project Timeline

Alison Oswald, NERC staff, reviewed details for the first in-person meeting on June 4-5, 2019 at the NERC offices in Atlanta, GA. Those that plan to attend in-person were reminded to register online for an accurate head count. The meeting will run from 8 a.m. Tuesday morning to 5 p.m.

Wednesday evening, and individuals were encouraged to stay until the very end of the meeting. The goals of the meeting include drafting language to address both directives in the FERC order and removing the GTB from the standard into two separate documents. Following the in-person meeting, a quality review of the draft standard will take place June 17-28, 2019. The team will meet to review the QR comments on July 2, 2019. On July 8, 2019, documents are due for the Standards Committee (SC) meeting which will be held July 24, 2019. The SC must authorize the initial posting of materials for this project. Once SC authorization is granted, the initial posting is

scheduled to run from July 29 to September 12, 2019. Following the initial posting, a second in-person meeting to make adjustments to the standard, as needed from industry feedback, is tentatively scheduled for the week of September 23, 2019. Volunteers are still being sought to host this meeting, as well as other future meetings, which are tentatively scheduled for the week of December 16, 2019 and the week of March 23, 2020.

5. Adjourn

The meeting was adjourned around 11:50 a.m. Eastern, May 22, 2019.

NERC Antitrust Guidelines

It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition. It is the responsibility of every NERC participant and employee who may in any way affect NERC's compliance with the antitrust laws to carry out this commitment.

Public Announcement

Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. The notice included the number for dial-in participation. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

NERC Standards Development Process-Participant Conduct Policy

<http://www.nerc.com/pa/Stand/Documents/Standards%20Development%20Process-Participant%20Conduct%20Policy.pdf>

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