

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Request for Data or Information

Protection System Misoperation Data
Collection

August 14, 2014

RELIABILITY | ACCOUNTABILITY



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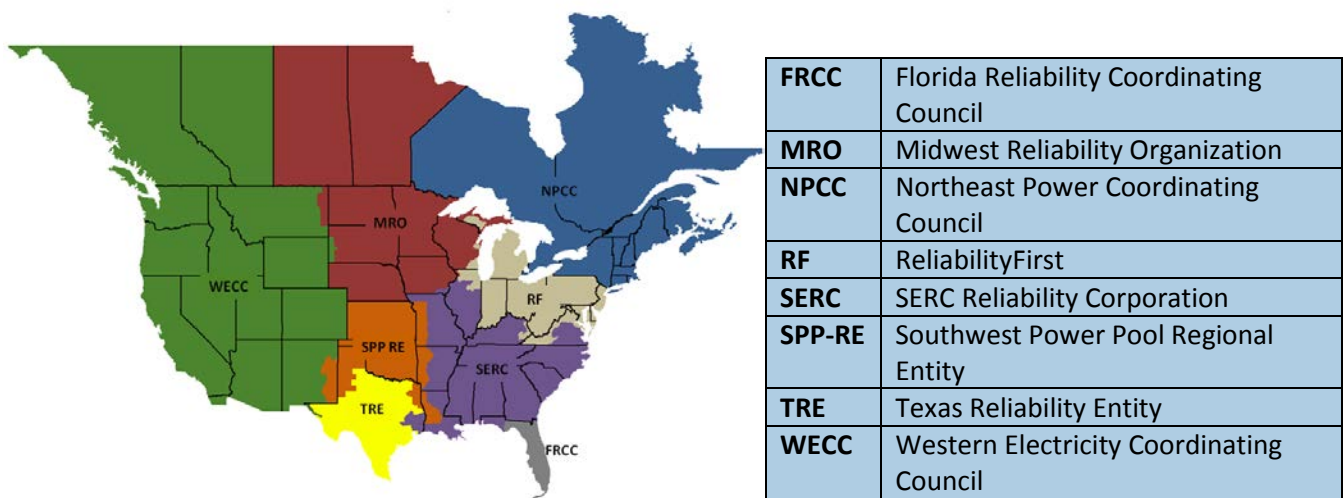
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Preface

The North American Electric Reliability Corporation (NERC) is a not-for-profit international regulatory authority whose mission is to ensure the reliability of the bulk power system (BPS) in North America. NERC develops and enforces Reliability Standards; annually assesses seasonal and long-term reliability; monitors the BPS through system awareness; and educates, trains, and certifies industry personnel. NERC’s area of responsibility spans the continental United States, Canada, and the northern portion of Baja California, Mexico. NERC is the electric reliability organization (ERO) for North America, subject to oversight by the Federal Energy Regulatory Commission (FERC) and governmental authorities in Canada. NERC’s jurisdiction includes users, owners, and operators of the BPS, which serves more than 334 million people.

The North American BPS is divided into several assessment areas within the eight Regional Entity (RE) boundaries, as shown in the map and corresponding table below.



Introduction and Survey Scope

In accordance with Section 1600 of the NERC *Rules of Procedure*,¹ NERC may request data or information (“Data Request”) necessary in order to meet its obligations under Section 215 of the Federal Power Act, as authorized by Section 39.2(d)² of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations.

Standard development Project 2010-05.1 – Phase 1: Protection Systems (Misoperations³) involves the revision of Reliability Standard PRC-004-2.1a (Analysis and Mitigation of Transmission and Generation Protection System Misoperations). The revised standard, PRC-004-3 (Protection System Misoperation Identification and Correction), will combine Reliability Standard PRC-003-1 – Regional Procedure for Analysis of Misoperations of Transmission and Generation Protection Systems and Reliability Standard PRC-004-2.1a.

The Standards Authorization Request in Project 2010-05.1, which sets the scope of work for combining Reliability Standards PRC-003-1 and PRC-004-2.1a, includes instructions to address the following in Project 2010-05.1:

- Clarify the definition of “Misoperation;”
- Establish a consistent metric for measuring Protection System performance with uniform applicability;
- Clarify reporting requirements and processes;
- Review all Faults or Protection System operations on the Bulk Electric System (“BES”) to identify those that are BES Protection System Misoperations;
- Analyze BES Protection System Misoperations to determine cause(s); and
- Develop and implement Corrective Action Plans to address the causes of BES Protection System Misoperations.

The Protection System Misoperations Standard Drafting Team (SDT) in Project 2010-05.1 has removed the data reporting obligation included in Reliability Standard PRC-004-2.1a⁴ from the revised standard and recommended that NERC request the data required for performance analysis purposes pursuant to Section 1600 of the NERC *Rules of Procedure*. The revised Reliability Standard PRC-004-3 will continue to require retention of data or evidence of compliance with the standard, but will no longer require periodic reporting of that information. Periodic, quarterly submittals of Misoperation data will be associated with reporting under this Section 1600 Data Request.

The purpose of this Data Request is to continue consistent reporting of Misoperation data to NERC through a standardized template for performance analysis. NERC will analyze the data to:

- Develop meaningful metrics to assess Protection System performance;
- Identify trends in Protection System performance that negatively impact reliability;
- Identify remediation techniques to reduce the rate of occurrence and severity of Misoperations;

¹ NERC’s *Rules of Procedure* are available at: <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

² 18 C.F.R. § 39.2(d) (2014).

³ “Misoperation” is a defined term in the NERC *Glossary of Terms Used in NERC Reliability Standards* (“NERC Glossary”), available at: http://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf.

⁴ Requirement R3 of PRC-004-2.1a requires Transmission Owners, any Distribution Providers that own a transmission Protection System, and Generator Owners to provide to its Regional Entity documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Entity’s procedures.

- Provide focused assistance to entities in need of guidance; and
- Publicize lessons learned to the industry.

Monitoring, analyzing, and tracking trends in Protection System Misoperations are critical to improve BES reliability. Historically, Protection System Misoperations have exacerbated the severity of most cascading power outages. For example, Protection System Misoperations played a significant role in expanding the impacts of the August 14, 2003 Northeast blackout.⁵ In the 2012 State of Reliability report,⁶ Misoperations were identified as one of the top risks to reliability. Additionally, Protection System Misoperations were cited as being one of the primary risk factors in the 2013 State of Reliability report.⁷ Following the recommendations in the 2012 State of Reliability report, the Protection System Misoperations Task Force was formed to review Misoperations and provide recommendations for reducing Misoperations. The task force analyzed the top three causes of Misoperations between the first quarter of 2011 and the second quarter of 2012 and developed suggestions to reduce Misoperations. This analysis relied heavily on the data collected under Reliability Standard PRC-004-002.1a. Absent this information, the analysis would not have been possible. The 2014 State of Reliability report continued to identify Protection System Misoperations as a significant contributor to automatic transmission outage severity. The report recommended completion of the development of PRC-004-3 as part of the solution to address Protection System Misoperations.

Further, Misoperation data collection provides several benefits to BES reliability and supports NERC's mission of ensuring the reliability of the BPS in North America. The proposed Data Request will make available the information necessary for NERC to provide high value risk analysis. This data will also allow NERC to identify areas for improvement in Misoperation rates through quantitative data analysis. For these reasons, NERC is proposing to continue collection of the data immediately upon the retirement of the data reporting obligation in Reliability Standard PRC-004-2.1a.

NERC posted a proposed Data Request in accordance with the requirements of Section 1602 of the NERC *Rules of Procedure* for a 45-day public comment period. On July 23, 2013, NERC provided this proposed Data Request to FERC for review as required by Section 1602 of the NERC *Rules of Procedure*. After consideration of comments received, NERC made revisions to the proposed Data Request. If approved by the Board as required by Section 1602 of the NERC *Rules of Procedure*, this Data Request will become mandatory concurrently with the retirement of Reliability Standard PRC-004-2.1a which presently contains the data reporting obligation.

⁵ U.S.-Canada Power System Outage Task Force Study: August 14th Blackout: Causes and Recommendations at 109, available at: <https://reports.energy.gov/BlackoutFinal-Web.pdf>

⁶ 2012 State of Reliability, available at: http://www.nerc.com/pa/RAPA/PA/Performance%20Analysis%20DL/2012_SOR.pdf

⁷ State of Reliability 2013, available at: http://www.nerc.com/pa/RAPA/PA/Performance%20Analysis%20DL/2013_SOR_May%2015.pdf

NERC Contact Information

The Data Request must be completed in electronic format. Should the submitting entity experience any issues with submitting its data, contact Charles Aderholdt via email at Charles.Aderholdt@nerc.net or by telephone at (404) 446-2569. If the respondent believes that any of the responses to this survey should remain confidential, contact the project manager directly for further instructions.

Official correspondence may be mailed to:

NERC – Misoperations
C/O Charles Aderholdt
3353 Peachtree Road, Suite 600, North Tower
Atlanta, GA 08540

Authority

Under Section 215 of the Federal Power Act (16 U.S.C. § 824o), Congress entrusted FERC with the duties of approving and enforcing rules to ensure the reliability of the BPS, and with the duties of certifying an Electric Reliability Organization (“ERO”) that would be charged with developing and enforcing mandatory Reliability Standards, subject to FERC approval. NERC was certified as the ERO on July 20, 2006. NERC’s authority for issuing this survey is derived from Section 215 of the Federal Power Act, and from the following sources:

Section 39.2(d) of the FERC’s regulations (18 C.F.R. §39.2(d)) provides:

Each user, owner or operator of the Bulk-Power System within the United States (other than Alaska and Hawaii) shall provide the Commission, the Electric Reliability Organization and the applicable Regional Entity such information as is necessary to implement section 215 of the Federal Power Act as determined by the Commission and set out in the Rules of the Electric Reliability Organization and each applicable Regional Entity. The Electric Reliability Organization and each Regional Entity shall provide the Commission such information as is necessary to implement section 215 of the Federal Power Act.

Section 1600 of NERC’s Rules of Procedure provides:

1601. Scope of a NERC or Regional Entity Request for Data or Information

Within the United States, NERC and Regional Entities may request data or information that is necessary to meet their obligations under Section 215 of the Federal Power Act, as authorized by Section 39.2(d) of the Commission’s regulations, 18 C.F.R. § 39.2(d). In other jurisdictions, NERC and Regional Entities may request comparable data or information, using such authority as may exist pursuant to these rules and as may be granted by ERO governmental authorities in those other jurisdictions. The provisions of Section 1600 shall not apply to requirements contained in any Reliability Standard to provide data or information; the requirements in the Reliability Standards govern. The provisions of Section 1600 shall also not apply to data or information requested in connection with a compliance or enforcement action under Section 215 of the Federal Power Act, Section 400 of these Rules of Procedure, or any procedures adopted pursuant to those authorities, in which case the Rules of Procedure applicable to the production of data or information for compliance and enforcement actions shall apply.

1602. Procedure for Authorizing a NERC Request for Data or Information

1. *NERC shall provide a proposed request for data or information or a proposed modification to a previously-authorized request, including the information specified in paragraph 1602.2.1 or 1602.2.2 as applicable, to the Commission's Office of Electric Reliability at least twenty-one (21) days prior to initially posting the request or modification for public comment. Submission of the proposed request or modification to the Office of Electric Reliability is for the information of the Commission. NERC is not required to receive any approval from the Commission prior to posting the proposed request or modification for public comment in accordance with paragraph 1602.2 or issuing the request or modification to reporting entities following approval by the Board.*
2. *NERC shall post a proposed request for data or information or a proposed modification to a previously authorized request for data or information for a forty-five (45) day public comment period.*
 - 2.1. *A proposed request for data or information shall contain, at a minimum, the following information: (i) a description of the data or information to be requested, how the data or information will be used, and how the availability of the data or information is necessary for NERC to meet its obligations under applicable laws and agreements; (ii) a description of how the data or information will be collected and validated; (iii) a description of the entities (by functional class and jurisdiction) that will be required to provide the data or information ("reporting entities"); (iv) the schedule or due date for the data or information; (v) a description of any restrictions on disseminating the data or information (e.g., "confidential," "critical energy infrastructure information," "aggregating" or "identity masking"); and (vi) an estimate of the relative burden imposed on the reporting entities to accommodate the data or information request.*
 - 2.2. *A proposed modification to a previously authorized request for data or information shall explain (i) the nature of the modifications; (ii) an estimate of the burden imposed on the reporting entities to accommodate the modified data or information request, and (iii) any other items from paragraph 1.1 that require updating as a result of the modifications.*
3. *After the close of the comment period, NERC shall make such revisions to the proposed request for data or information as are appropriate in light of the comments. NERC shall submit the proposed request for data or information, as revised, along with the comments received, NERC's evaluation of the comments, and recommendations, to the Board.*
4. *In acting on the proposed request for data or information, the Board may authorize NERC to issue it, modify it, or remand it for further consideration.*
5. *NERC may make minor changes to an authorized request for data or information without Board approval. However, if a reporting entity objects to NERC in writing to such changes within 21 days of issuance of the modified request, such changes shall require Board approval before they are implemented.*

6. *Authorization of a request for data or information shall be final unless, within thirty (30) days of the decision by the Board, an affected party appeals the authorization under this Section 1600 to the ERO governmental authority.*

1603. Owners, Operators, and Users to Comply

Owners, operators, and users of the BPS registered on the NERC Compliance Registry shall comply with authorized requests for data and information. In the event a reporting entity within the United States fails to comply with an authorized request for data or information under Section 1600, NERC may request the Commission to exercise its enforcement authority to require the reporting entity to comply with the request for data or information and for other appropriate enforcement action by the Commission. NERC will make any request for the Commission to enforce a request for data or information through a non-public submission to the Commission's enforcement staff.

1605. Confidentiality

If the approved data or information request includes a statement under Section 1602.1.1(v) that the requested data or information will be held confidential or treated as Critical Energy Infrastructure Information, then the applicable provisions of Section 1500 will apply without further action by a Submitting Entity. A Submitting Entity may designate any other data or information as Confidential Information pursuant to the provisions of Section 1500, and NERC or the Regional Entity shall treat that data or information in accordance with Section 1500. NERC or a Regional Entity may utilize additional protective procedures for handling particular requests for data or information as may be necessary under the circumstances.

1606. Expedited Procedures for Requesting Time-Sensitive Data or Information

1. *In the event NERC or a Regional Entity must obtain data or information by a date or within a time period that does not permit adherence to the time periods specified in Section 1602, the procedures specified in Section 1606 may be used to obtain the data or information. Without limiting the circumstances in which the procedures in Section 1606 may be used, such circumstances include situations in which it is necessary to obtain the data or information (in order to evaluate a threat to the reliability or security of the BPS, or to comply with a directive in an order issued by the Commission or by another Applicable Governmental Authority) within a shorter time period than possible under Section 1602. The procedures specified in Section 1606 may only be used if authorized by Board prior to activation of such procedures.*
2. *Prior to posting a proposed request for data or information, or a modification to a previously-authorized request, for public comment under Section 1606, NERC shall provide the proposed request or modification, including the information specified in paragraph 1602.2.1 or 1602.2.2 as applicable, to the Commission's Office of Electric Reliability. The submission to the Commission's Office of Electric Reliability shall also include an explanation of why it is necessary to use the*

- expedited procedures of Section 1606 to obtain the data or information. The submission shall be made to the Commission's Office of Electric Reliability as far in advance, up to twenty-one (21) days, of the posting of the proposed request or modification for public comments as is reasonably possible under the circumstances, but in no event less than two (2) days in advance of the public posting of the proposed request or modification.*
- 3. NERC shall post the proposed request for data or information or proposed modification to a previously-authorized request for data or information for a public comment period that is reasonable in duration given the circumstances, but in no event shorter than five (5) days. The proposed request for data or information or proposed modification to a previously-authorized request for data or information shall include the information specified in Section 1602.2.1 or 1602.2.2, as applicable, and shall also include an explanation of why it is necessary to use the expedited procedures of Section 1606 to obtain the data or information.*
 - 4. The provisions of Sections 1602.3, 1602.4, 1602.5 and 1602.6 shall be applicable to a request for data or information or modification to a previously-authorized request for data or information developed and issued pursuant to Section 1606, except that (a) if NERC makes minor changes to an authorized request for data or information without Board approval, such changes shall require Board approval if a Reporting Entity objects to NERC in writing to such changes within five (5) days of issuance of the modified request; and (b) authorization of the request for data or information shall be final unless an affected party appeals the authorization of the request by the Board to the Applicable Governmental Authority within five (5) days following the decision of the Board authorizing the request, which decision shall be promptly posted on NERC's website.*

Data Request

Data Description

Effective immediately upon the retirement of Reliability Standard PRC-004-2.1a, data included in Table 1 below will be collected quarterly on a per-entity basis. The data will be collected for Misoperations, as defined in the NERC Glossary, which are identified pursuant to Reliability Standard PRC-004. In cases where multiple entities own a Protection System, the entity responsible for identifying whether its Protection System Component(s) caused a Misoperation pursuant to PRC-004 will report Misoperation data under this Data Request.

Table 1: Protection System Misoperation Fields	
Tab 1 – Operation Summary	
Field Name	Field Description
Data Submission Year	The calendar year for which the operation data is reported.
Data Submission Quarter	The calendar quarter for which the operation data is reported.
Regional Entity Name	The entity’s Regional Entity. If the entity is registered in multiple Regional Entities, the Regional Entity area where the Misoperation occurred.
Functional Entity NERC ID	The entity’s NERC compliance registry number. If the entity does not have a NERC compliance registry number, the company name.
Total Protection System Operations by Voltage Class	The total number of Protection System operations by system voltage based on the definition in the reporting template.
Tab 2 – Misoperation Entry Form	
Field Name	Field Description
Misoperation ID	An entity-specific Misoperation identifier.
Regional Entity	The entity’s Regional Entity. If the entity is registered in multiple Regional Entities, the Regional Entity area where the Misoperation occurred.
NERC ID	The entity’s NERC compliance registry number. If the entity does not have a NERC compliance registry number, the company name.
Misoperation Date	The date of the Misoperation.
Misoperation Time	The time of the Misoperation.
Time Zone	The time zone in which the Misoperation occurred.
Facility Name (Location of Misoperation)	The name of the facility (i.e., substation or generating station) where the Misoperation occurred.
Equipment Name (protected by Protection System that Misoperated)	The name of the generator, transmission line, transformer, bus, or equipment protected by the Protection System that misoperated.
Equipment Type	The type of equipment being protected (e.g., line, transformer, etc.).
Facility Voltage	The system voltage of the protected Element. If the Element is a transformer, the high-side voltage. If the Element is a generator, the GSU transformer high-side voltage.

Table 1: Protection System Misoperation Fields	
Equipment Removed from Service (Permanently or Temporarily) as the result of the Misoperation	The names of the equipment becoming unavailable due to the Misoperation (Equipment refers only to circuits, transformers, buses, but not breakers UNLESS the breaker is the only Element). Breaker should be used only if a single breaker tripped and did not disconnect any Element at one of its terminals (one breaker in a multiple breaker protected line, bus tie breaker, etc.).
Event Description	A brief description of the event including: <ol style="list-style-type: none"> 1. Initiating event: include a description of any internal or external fault causes, any abnormal system conditions which may have contributed to the Misoperation, or state that the Misoperation occurred under normal operating conditions. 2. Facilities involved on which Protection Systems operated correctly and/or incorrectly concurrent with the Misoperation. 3. Component(s) of the Protection System(s) that failed and/or did not function correctly. 4. Detailed description of root causes determined by completed Corrective Action Plans.
Misoperation Category (as defined in the reporting template)	The category of the Misoperation: <ul style="list-style-type: none"> • Failure to Trip – During Fault • Failure to Trip – Other Than Fault • Slow Trip – During Fault • Slow Trip – Other Than Fault • Unnecessary Trip – During Fault • Unnecessary Trip – Other Than Fault
Cause(s) of Misoperation (as defined in the reporting template)	The primary cause of the Misoperation: <ul style="list-style-type: none"> • AC system • As-left personnel error • Communication failures • DC system • Incorrect settings • Logic errors • Design errors • Relay failures/malfunctions • Unknown/unexplainable • Other/Explainable
Protection Systems/Components that Misoperated	Information on the Protection Systems/Components that Misoperated. If the “Cause of Misoperation” is “Relay failures/malfunctions,” “Incorrect settings,” “Logic errors,” or “Design errors,” and the cause is associated with a relay, this field is used to identify the relay models (types) and protection schemes.
Relay Technology	If the Cause of Misoperation is “Relay failures/malfunctions,” “Incorrect settings,” “Logic errors,” or “Design errors”, this field is used to identify the relay technology installed. <ul style="list-style-type: none"> • Electromechanical • Solid State • Microprocessor

Table 1: Protection System Misoperation Fields	
Is this a Transmission Availability Data System (TADS) reportable event?	Whether the Misoperation involved the automatic outage of a TADS-reportable transmission Element. (Reporting by Transmission Owners only.)
Select one or more TADS "Element IDs" for any TADS reportable Elements outaged in the Misoperation.	If a TADS reportable Element was outaged due to the Misoperation, the Element(s) in a comma-separated list. (Reporting by Transmission Owners only.)
Is this a Generation Availability Data System (GADS) reportable event?	Whether the Misoperation involved the automatic outage of a GADS-reportable Element. (Reporting by Generator Owners only.)
If the Misoperation caused a generator forced outage, select one or more Generation Availability Data System (GADS) "Unit IDs" for any GADS reportable Elements outaged in the Misoperation.	If a GADS reportable Element was outaged due to the Misoperation, the Element(s) in a comma-separated list. (Reporting by Generator Owners only.)
Analysis and Corrective Action Status	The status, selected from a drop-down list.
Corrective Action Plan	Identification of the corrective actions. "None" if, in place of a CAP, a declaration was made stating no further corrective actions will be taken.
Corrective Action Plan Target Completion Date	If corrective actions are not complete, an estimate of when they will be complete.
Actual Completion Date	If corrective actions are complete, the actual completion date.
Reported By	The person who filled out the report.
Reporter's Telephone Number	The reporting person's phone number.
Reporter's Email Address	The e-mail address of the reporter.
Date Reported	The report date.
Additional Contact Name (Optional)	An additional contact with knowledge of the data.
Additional Contact's Phone Number (Optional)	If entering an additional contact, the person's phone number.
Additional Contact's Email Address (Optional)	If entering an additional contact, the person's email.

There are several differences between the data fields used in previous reporting and the proposed data fields. These differences are summarized in Table 2 below.

Table 2: Changes to Misoperation Data Fields	
Field Name	Field Description
Misoperation Category	The Failure to Trip and Slow Trip categories have been divided into four categories by splitting each into "During Fault" and "Other than Fault" categories, consistent with the revised Misoperation definition.

Table 2: Changes to Misoperation Data Fields

Field Name	Field Description
Cause(s) of Misoperation	The “Incorrect settings/logic/design errors” cause has been separated into three causes: “Incorrect settings”, “Logic errors”, and “Design errors”.
Is this a Generation Availability Data System (GADS) reportable event?	A field has been added to identify whether the Misoperation involved the automatic outage of a GADS reportable Element.
If the Misoperation caused a generator forced outage, select one or more Generation Availability Data System (GADS) "Unit IDs" for any GADS reportable Elements outaged in the Misoperation.	A field has been added to identify the GADS reportable Elements outaged.

Use of Data

NERC will continue to use the Misoperation information and Protection System operation information to develop statistics regarding the Misoperation rates for the BES. Collection of the total Protection System operations facilitates normalization to account for differences among Registered Entities (e.g., location, climate, size, density, protection schemes used). The Misoperation rate metric can be used to gauge the performance of BES Protection Systems for both generation and transmission Elements. The relative percentage indicates the relative performance of Protection System operations, specifically Protection System Misoperations as a ratio of total Protection System operations. Without knowledge of the Misoperation rates across NERC, normalized measurement of Misoperation reduction will not be possible. In addition, NERC and the Regional Entities will analyze the raw data to identify trends in Protection System Misoperations. Finally, the Misoperation data will be used to support statistical analysis of risks to the BES.

Section 215(g) of the Federal Power Act requires NERC to make periodic assessments on the reliability of the BPS in North America. This Data Request will provide NERC the data necessary to make periodic risk-based assessments to evaluate BPS reliability and provide for continuous analysis of performance and reliability risk. A better understanding of Protection System Misoperations will allow NERC to develop effective requirements to address one of the top risks to the BES.

Entities Required to Comply

The submission of Protection System Misoperation data is mandatory for all U.S. Transmission Owners, Generator Owners, and Distribution Providers who are on the NERC Compliance Registry. Non-U.S. Transmission Owners, Generator Owners, and Distribution Providers should provide data in accordance with the legislation, laws, regulations, rules or orders of their Applicable Governmental Authority. Non-U.S. Transmission Owners, Generator Owners, and Distribution Providers are strongly encouraged to provide the requested data to ensure the completeness of the data collected for analysis.

Scheduling and Reporting

Entities will report data on a quarterly basis. The first reporting period under the Data Request will be the quarter beginning on the first day of the first calendar quarter that is nine (9) months after the date that the PRC-004-3 is approved by an Applicable Governmental Authority or as otherwise provided for in a jurisdiction where approval by an Applicable Governmental Authority is required for a standard to go into effect. Where approval by an Applicable Governmental Authority is not required, the first reporting period under the Data Request will be the quarter beginning on first day of the first calendar quarter that is nine (9) months after the

date the Data Request is approved by the Board or as otherwise provided for in that jurisdiction. The deadline for reporting will be 60 days after the end of each quarter.

The reporting schedule is intended to prevent any gap or overlap with reporting that is required pursuant to PRC-004-2.1a. As a result, data for the last quarter occurring prior to retirement of PRC-004-2.1a will be reported under the Data Request. This transition is necessary because the reporting deadline for one period during transition will occur when PRC-004-2.1a is no longer subject to enforcement.

The data will be manually entered or bulk uploaded by Transmission Owners, Generator Owners, and Distribution Providers that own a BES Protection System into the Misoperation module of the webTADS system. After the software checks for errors, a review period will be provided for Regional Entities to review data submitted by the entities in their Region. The Regional Entities will review and sign-off on the data prior to review by NERC. Subsequent to Regional Entity review, NERC will further validate the data and use the data as described above. A final template to be used for bulk uploads is available at: http://www.nerc.com/pa/RAPA/ProtectionSystemMisoperations/Section_1600_Misoperations_Final_Template.xlsx. Data will be bulk uploaded or entered manually through a graphical user interface using the same fields.

Dissemination of Data

NERC's treatment of confidential information is governed by Section 1500 of NERC's *Rules of Procedure* and other agreements with Applicable Governmental Authorities. Individual Misoperation reports are considered confidential. Aggregated Misoperation information is considered public information. However, aggregated Misoperation data public reports will not inadvertently release confidential information by the display of regional or NERC information from which an entity's confidential information could be ascertained.

Burden to Entities

Because entities have been reporting similar data since 2011, there is minimal additional burden for this Data Request. All eight Regional Entities already collect this, or very similar, information using a common template. Reporting Entities are already reporting Misoperations data under the regional procedures as required in Reliability Standard PRC-004-2.1a and minimal changes should be necessary to comply with this Data Request.