Unofficial Comment Form

Project 2014-03 Revisions to TOP/IRO Reliability Standards

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=a0921644456b4db99b028a5c8f3dd58f) to submit comments on the Standard. The electronic comment form must be completed by 8 p.m. EST **Friday, September 19, 2014.**

If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

The project web page can be found at: <http://www.nerc.com/pa/Stand/Pages/Project-2014-03-Revisions-to-TOP-and-IRO-Standards.aspx>

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

On April 16, 2013, NERC submitted two petitions requesting Commission approval of TOP and IRO standards.

On November 21, 2013, FERC issued a [NOPR](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/NOPR_TOP_IRO_RM13-12_RM13-14_RM13-15_20131121.pdf) proposing to remand three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards and four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards. In the NOPR, FERC stated that NERC “has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.”

In response, NERC filed a [motion](http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final_Final_Motion_to_Defer_Action_20131220%20(1).pdf) requesting that FERC defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR and afford time to review the proposed TOP and IRO Standards through the NERC standards development process. That motion to defer action was granted on January 14, 2014.

The standard drafting team (SDT) formed to address those concerns made revisions to the TOP and IRO standards proposed to be remanded, along with several other IRO standards to provide consistency amongst the TOP and IRO standards, to address NOPR issues and recommendations made by the Independent Expert Review Panel, the IRO five-year review team, and the 2011 SW Outage Report. The initial draft standards were posted for an initial comment period and ballot through July 2, 2014.

This is the second posting of the standards. The SDT has made numerous changes in the second posting to the proposed standards and definitions in order to respond to industry comments raised in the first posting.

The SDT requests that commenters objectively evaluate the work of the SDT in responding to the issues raised in FERC’s November 21, 2013 NOPR, along with the recommendations made by the Independent Expert Review Panel (IERP), the IRO FYRT, and the SW Outage Report. The drafting team has committed to address these issues and is not at liberty to question the issues in the FERC NOPR.

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

## Questions

1. Do you agree with the changes made to respond to industry comments to proposed IRO-001-4? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed IRO-002-4? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed IRO-008-2? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed IRO-010-2? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed IRO-014-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. The drafting team has proposed a new standard to address outage coordination concerns. Do you agree with the changes made to respond to industry comments to the new standard, IRO-017-1? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed TOP-001-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed TOP-002-4? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you agree with the changes made to respond to industry comments to proposed TOP-003-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. Do you have any comments on the changes made to respond to industry comments on the SOL Exceedance White Paper? If so, please provide technical rationale for your disagreement along with suggested language changes.

Yes:

No:

Comments:

1. The SDT has made revisions to VRFs and VSLs as needed to conform to changes made to requirements and to respond to industry comments. Do you agree with the VRFs and VSLs for the nine posted standards? If you do not agree, please indicate specifically which standard(s) and requirement(s), and whether it is the VRF or VSLs you disagree with, and explain why.

Yes:

No:

Comments:

1. Are there any other concerns with these standards that haven’t been covered in previous questions and comments?

Yes:

No:

Comments: