

# Notice of Request to Waive the Standard Process

## Project 2014-03 – Revisions to TOP and IRO Reliability Standards

As required by Section 16 of the NERC [Standard Processes Manual](#) (SPM), this is official notice to stakeholders that the leadership of the Project 2014-03 Revisions to TOP and IRO Reliability Standards Drafting Team, the Project Management Oversight Subcommittee (PMOS) liaison for that project, Standards Committee (SC) chair, and NERC Standards Staff (Requesters) are requesting that the SC consider a waiver of the Standard Processes Manual. The Requesters ask to shorten the next formal comment and ballot period for draft standard TOP-001-3, and any subsequent comment formal comment and ballot periods prior to final ballot for that standard, from 45 days to 30 days, and to shorten the final ballot for TOP-001-3 from ten days to seven days, in order to meet a regulatory deadline. Section 16 of the SPM provides for the granting of waivers for regulatory deadlines and where the SC determines that a modification to a proposed Reliability Standard has already been vetted by the industry through the standard development process.

The SC will meet via teleconference to consider this waiver request no earlier than Thursday, October 9, 2014 (to comply with the five business day notice required by Section 16 of the SPM). The Standards Committee's teleconference will be noticed through an announcement and posted on the NERC website. Additional details about the waiver request are included below, and should a waiver be granted by the SC, it will be posted on the [project page](#).

### Justification for Current Waiver Request

On April 16, 2013, NERC submitted two petitions requesting FERC approval of TOP and IRO standards. [One petition](#) addresses 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) (collectively, the "TOP Standards") to replace the eight currently-effective TOP standards. The [second petition](#) addresses 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) (collectively, the "IRO Standards") to replace six currently-effective IRO standards.

On November 21, 2013, the Federal Energy Regulatory Commission (FERC) issued a Notice of Proposed Rulemaking (NOPR) proposing to remand three revised TOP Reliability Standards and four revised IRO Reliability 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." On December 20, 2013, NERC filed a motion requesting that the Commission 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 to ensure that a technically justified set of solutions is in place for reliability.

NERC's motion to defer action was granted on January 14, 2014.

The drafting team has developed a set of eight revised standards and one new standard to replace the standards that the NOPR proposed to remand. The standards have been posted for two 45-day comment periods and ballots, and in the ballot ending September 19, 2014, eight of the nine standards achieved greater than the required two-thirds weighted segment approval.

The drafting team met to review stakeholder feedback on September 30 and October 1, and based on that feedback has made substantive revisions to TOP-001-3. The shortened comment period and ballot for TOP-001-3 serves two important purposes. First, should it be necessary to conduct more than one additional ballot to reach consensus on TOP-001-3, the shortened comment period will allow for one additional comment period and ballot while still allowing the nine standards to be filed with FERC by the January 31, 2015 deadline. Second, shortening the ballot period from ten days to seven days provides additional time during the comment period for drafting team outreach prior to the start of the ballot. This outreach may be important to ensure stakeholder support for the standard.

Finally, shortening the final ballot period for TOP-001-3 from ten days to seven days provides scheduling flexibility that may be required to achieve the necessary milestones prior to filing (including possibly scheduling a special call for NERC Board adoption), while still allowing NERC and the industry to successfully meet the January 31, 2015 filing deadline. If NERC is unable to meet the January 31, 2015 deadline, FERC may proceed with its proposed remand of the TOP and IRO standards.

### Standards Development Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Laura Hussey,  
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## Waiver Authorization for Project 2014-03: Revisions to TOP and IRO Reliability Standards

### Action

Authorize a waiver of the Standard Processes Manual (SPM) to:

- a) shorten the next additional formal comment period (and any subsequent additional formal comment periods) for draft standard TOP-001-3 from 45 days to 30 days, with a ballot and non-binding poll during the last seven days of the 30 day period; and
- b) shorten the final ballot period from ten days to seven days.

### Background

The leadership of the TOP/IRO Standard Drafting Team, NERC staff, and the PMOS liaison and Standards Committee (SC) chair have requested a waiver of the NERC [Standards Processes Manual](#) (SPM) as described in the actions above. Section 16 of the SPM provides for the granting of waivers for regulatory deadlines and where the SC determines that a modification to a proposed Reliability Standard has already been vetted by the industry through the standard development process. As required in Section 16, NERC provided stakeholders with notice of these waiver requests on October 2, 2014. If a waiver is authorized, NERC staff will post notice of the waiver on the project page and notify the NERC Board of Trustees Standards Oversight and Technology Committee.

On April 16, 2013, NERC submitted two petitions requesting FERC approval of TOP and IRO standards. One petition addresses 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) (collectively, the "TOP Standards") to replace the eight currently-effective TOP standards. The second petition addresses 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) (collectively, the "IRO Standards") to replace six currently-effective IRO standards.

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