

REVISIONS TO TOP/IRO RELIABILITY STANDARDS

Conference Call Notes

1. Introduction

The Chair brought the call to order at 11:00 a.m. EST on Thursday, November 20, 2014. Call participants were:

Members		
David Bueche, CenterPoint	Allen Klassen, Westar	Bruce Larsen, WE
Jason Marshall, ACES	Andy Pankratz, FPL, Vice Chair	Bert Peters, APS
Kyle Russell, IESO	Eric Senkowicz, FRCC	Dave Souder, PJM, Chair
Ed Dobrowolski, NERC		
Observers		
Eugene Blick, FERC	Brian Murphy, Next Era, PMOS Liaison	Darrell Piatt, FERC
Phillip Shafeei, Colorado Springs	Stacey Tyrewala, NERC	

2. Determination of Quorum

Quorum was achieved.

3. NERC Antitrust Compliance Guidelines and Public Announcement

NERC's Antitrust Compliance Guidelines and public announcement were delivered.

4. SDT Participant Conduct Policy

The SDT participant conduct policy was reviewed.

5. SDT E-mail List Policy

The SDT e-mail list policy was discussed.

6. Membership Changes and Roster Updates

There were no changes to membership or roster updates.

7. **Review Agenda and Objectives – Dave Souder**

The agenda was approved as issued.

The objective of the call was to finalize the draft responses to comments from the third posting and any accompanying changes to proposed TOP-001-3.

8. **Report on Third Posting Webinar – Dave Souder**

The webinar went well but participation was down significantly from previous efforts.

9. **Review Ballot Results**

The ballot results showed a significant uptick which indicates that the changes made were in the right direction and that outreach was working. However, the final result was still 7 percent short of acceptance so more work needs to be done.

10. **Review of the Draft Responses to the Third Posting**

A sub-team consisting of Dave Souder, Andy Pankratz, Allen Klassen, and Jason Marshall drafted responses and changes to the standard for full SDT review.

Requirements R1/R2: The term 'address' was changed to 'maintain' due to multiple comments; several commenters brought up a possible double jeopardy issue due to the inclusion of 'direct actions' and possible duplication with specific directed acts in other standards but the SDT believed that these requirements were generic in nature and didn't conflict with other specific requirements in other standards and therefore did not make any change; there was a comment about too much documentation being required for tracking Operating Instructions but the SDT believes that documentation issues have been addressed in the RSAW.

Requirements R3/R4/R5/R6: The SDT deleted Load-Serving Entity (LSE) as an applicable entity due to the November Board of Trustees approval of the deletion of LSE as a functional entity.

Requirement R7: The SDT added 'Reliability Coordinator Area' as a limiter; added 'comparable' as a qualifier; and changed 'entity' to 'Transmission Operator'.

Requirement R9: The SDT changed 'sustained' to '30 minutes' consistent with other standards; decided that notification timeframes were not an issue as the SDT wants the operator to concentrate on resolving the problem and not about how long they have to notify others – notification will be made as quickly as the situation permits.

Requirements R16/R17: 'telecommunication' was replaced with the list of items from Requirement R9 for consistency; VSL was made consistent with that of Requirement R10.

Comments were received on the deletion of the approved requirement for returning the system from an unknown state in 30 minutes. The SDT believes that the Operating Plan will include directions on such situations. Kyle Russell and Dave Souder will work on tweaking the suggested response for better clarity.

Based on comments received, the SOL Exceedance White Paper will not be attached to the standard, but will be posted to a separate accessible place on the NERC website.

There were a number of comments concerning the inclusion of the terms 'non-BES' and 'monitor' in Requirement R10. The SDT reviewed NOPR paragraphs 59 – 61 and 67 – 69, which used the term 'sub-100 kV', and upon further review believes that those paragraphs are describing functional capability and Operational Planning Analysis. Comments pointed out that if a non-BES element was impactful to the BES that it would be brought into the BES through the BES Exception Process as described in FERC Order 773, paragraph 273. Therefore, the SDT believes that the introduction of a formal Operational Planning Analysis, the changes to the definition of same, and the introduction of the SOL Exceedance White Paper sufficiently cover the NOPR comment and deleted 'non-BES' from the requirement language. The SDT also clarified the monitoring issue by changing the wording for points outside of the Transmission Operator Area to 'obtaining' to make it clear that an entity didn't need to place an RTU at another entity's substation but could get the needed data through other means such as a data link.

FERC staff supported the change from 'monitor' to 'obtain', but expressed some concerns with the deletion of 'non-BES'. Staff agreed that the NOPR contained language referring only to Operational Planning Analysis, but felt that the intent was broader. Staff expressed concern regarding the use of the BES Exception Process since it is still new and unproven. The SDT believes that if a problem is found in the BES Exception Process that the process should be fixed there and not by adding a requirement to this standard.

Removal of 'non-BES' from Requirement R10 caused the SDT to review proposed TOP-003-3 which also contained the term. The SDT decided to leave the term in proposed TOP-003-3 to allow for inclusion of such points for modeling concerns, LMP calculations, etc., and because inclusion of such points is at the discretion of the Transmission Operator as needed for the various functions.

11. Next Steps and Schedule

The next step in the process is to submit the project documents to Quality Review prior to a fourth posting. Proposed TOP-001-3 is still operating under the 30-day posting waiver granted by the Standards Committee so the next posting will be under the auspices of that waiver. The SDT is concerned about the impact of the upcoming holiday season on the potential end date for the posting and will express these concerns to NERC management when submitting its documents.

12. Discuss Outreach Assignments

Outreach needs to continue and emphasize operations contacts. SDT leadership will issue a new outreach assignment list. Members are encouraged to push as hard as possible.

13. Review Project Timeline

The project is still operating under a January 31, 2015 deadline for filing at FERC. That means that this fourth posting is the last chance for obtaining industry approval. SDT members were reminded that even though 8 of the 9 project standards have received approval that this is a package and all 9 must be approved for filing. It would be impossible to file 8 of 9. That means that if proposed TOP-001-3 doesn't receive approval that all 9 have essentially failed.

14. Future Meetings

Future meetings/webex will be scheduled based on actual posting dates and ballot results.

15. Action Item Review

Ed Dobrowolski will complete the final updates to the documents and submit them to Quality Review as quickly as possible.

16. Adjourn

The Chair thanked everyone for their participation and adjourned the call at 2:30 p.m. EST.