

# Notes

## Project 2007-03 – Real-time Operations

June 28, 2011 | 9:00 a.m. – 12:00 p.m. ET

Meeting Location: FERC Offices – Washington, DC

### Administrative

#### 1. Introductions and Quorum

The meeting was brought to order at 9:00 a.m. ET on Tuesday, June 28, 2011 at FERC in Washington, DC. Meeting participants were:

SDT Members		
Jim Case, Entergy, Chair		
NERC Staff		
Ed Dobrowolski, Coordinator	Andrew Dressel	Holly Hawkins
Dave Taylor		
FERC Staff		
Kal Ayoub	Eugene Blick	Jonathan First
Mike Gandolfo	Chris Mak	Keith O'Neal
Cynthia Pointer	Bob Snow	Bob Stroh

### Agenda

#### 1. Overview of the Project – Jim Case

The first ballot did not achieve consensus. Comments have been received and the Standard Drafting Team (SDT) is working on the responses. It is seen as a triage effort as opposed to a major overhaul. Key comments included:

- a. Possibility of double jeopardy in TOP-001-2, Requirements R1 & R2
- b. Clarification of local area reliability
- c. Confusion on the definition of Reliability Directive
- d. Delete all System Operating Limits (SOLs)
- e. The 30 minute time limit for SOLs is incorrect

- f. There should be a time line included in TOP-001-2, Requirement R2
- g. Non-BES Elements should not be included in TOP-003-2

## 2. Items of Concern for FERC Staff

FERC staff continues to have concerns with the current version of the standards:

### a. TOP-001-2, SOLs and Local Area Reliability

FERC staff had questions on this terminology previously and now sees questions arising in the comments as well. FERC staff pointed out that the existing standards are for all SOLs and that the recently approved Interconnection Reliability Operating Limit (IROL) standards pointed to the TOP standards for treatment of SOLs. Now, the proposed TOP standards seem to address only a subset of the SOLs raising the question of who will be responsible for the remainder of the SOLs.

Jim Case stated that by definition SOLs can't cause cascading and are simply local problems dealing with equipment life with no impact on reliability. The TOP is still going to be monitoring SOLs as spelled out in the Functional Model. The standard is just elevating certain SOLs to a higher status with Reliability Coordination (RC) involvement.

FERC staff reminded everyone that the '03 blackout did not involve any IROLs and now the proposed standard leaves what SOLs to select for special handling solely up to the Transmission Operator's judgment.

Jim Case said that the Transmission Operator is best suited to select the SOLs as they are the ones who know their system and what needs to be elevated.

FERC staff questioned what would happen to SOLs that adversely affect other TOPs.

Jim Case pointed to the proposed TOP-001-2, Requirement R5 as the answer to that question. It requires the Transmission Operator to notify others of problems on their system that might affect other systems.

FERC staff stated that the current TOP-004 says that all IROLs and SOLs are covered and that they must be mitigated in 30 minutes or less. This was clear and all inclusive and did not allow any vacillation.

### b. TOP-002-3, Local Footprint

FERC staff stated that they see the proposed TOP-002-3 as limited to the Transmission Operator's internal footprint due to the lack of explicit statements to include external areas in the analysis. Staff also stated that they felt that the proposed approach didn't provide operators with enough time to react to problems since all SOLs weren't covered.

Jim Case repeated that Transmission Operators are still responsible for all SOLs and that all important and non-routine SOLs will be identified and planned for.

c. TOP-001-2, Shedding Load for Single Contingency

FERC staff asked if the TOP standards as proposed would allow a Transmission Operator to shed load for a single contingency.

Jim Case stated that day ahead planning and real-time were two different situations and that if the only viable option in real-time is to shed load, then the Transmission Operator should, and will, shed load.

FERC staff said that if the situation was identified day ahead then a Transmission Operator should be looking at the Emergency Operations Planning (EOP) standards and should plan on shedding load as a last resort.

Jim Case agreed with that statement.

d. Definition of Reliability Directive

FERC staff stated that the existing use of the term is in lower case and is thus interpreted as more inclusive than the proposed which only deals with emergency situations. They also pointed to industry comments showing confusion surrounding the definition as well as the need for a timeframe to respond.

Jim Case pointed out that the general topic of communications is being handled in other projects. The TOP standards deal only with what the Transmission Operator needs and all other matters are handled elsewhere.

FERC staff re-iterated their position that this seems to leave a reliability gap.

e. TOP-002-3, Operational Planning Analysis

FERC staff stated that Operational Planning Analysis (OPA) is a base case situation and that industry comments pointed to it as an n-0 solution. Staff also questioned the timeframe of the OPA and asked where contingencies are studied. The existing TOP-002 has 19 explicit requirements and staff doesn't see the proposal as a true replacement in kind. Staff also pointed out that the recently approved IROL-008-1, Requirement R1 saw fit to expand on the OPA solution with an explicit statement to include contingencies.

f. Deletion of Balancing Authority

FERC staff referred to the existing TOP-002 where the Balancing Authority in many of the requirements. Staff doesn't agree that the Balancing Authority can be deleted from these requirements and pointed to industry comments on who was going to be responsible for unit commitment. The BAL standards are not a solution according to staff and coordination of planning is a concern.

Jim Case said that there were few comments on this topic and that a Balancing Authority can't comply with the BAL standards (DCS, CPS) without having done their unit commitment.

FERC staff pointed out that CPS1 is an annual factor.

Jim Case stated that CPS2 is based on 30 minutes.

FERC staff replied that CPS2 only covers 90% of the situation and that leaves 10% completely open.

Jim Case stated that there are multiple Balancing Authority requirements that overlap.

g. Coordination between Transmission Operator and Balancing Authority

FERC staff questioned how and where the Transmission Operator and Balancing Authority coordinate their planning.

Jim Case pointed to TOP-002-3, Requirement R3.

FERC staff stated that this is after the fact and questioned where any iteration would occur.

Jim Case stated that inputs came from the proposed TOP-003-2 which handles all data needs.

FERC staff stated that there is no language in the proposed standards to handle iterations in planning.

Jim Case stated that discussions occur all the time now and will continue to happen in the future. Requirements don't preclude these conversations from taking place. A Transmission Operator is not going to issue a plan that can't be operated to. The goal is still reliability and security.

h. Deliverability to Load

FERC staff questioned deliverability to the load as a key concern. This now appears to be an implicit consideration as opposed to an explicit statement in the existing standards such as TOP-002-2, Requirements R7 & R8. Deliverability is explicitly mentioned in Order 693.

i. TOP-003-2, Documented Specification of Data

FERC staff asked what a documented specification is. It seems open-ended, vague, and ambiguous. Thousands of entities will need to coordinate.

Jim Case stated that the proposed requirements are a reflection of actual operations today and don't represent a major change.

FERC staff asked whether the documented specification would include criteria for selection of data or just be a data list.

Jim Case replied that the requirement is just for a list but the standard didn't preclude other information such as selection criteria from being included.

FERC staff stated that many existing requirements are being mapped to TOP-003-2. It is not clear how this will work as planning and real-time are intermixed. Entities need to know exactly what they are required to do in a clear and unambiguous manner.

Jim Case stated that it is the intent of the SDT that all needed data is included in TOP-003-2 and that if a transmission Operator or Balancing Authority didn't ask for data that they needed, they bear the responsibility for the situation.

j. Deletion of Requirements due to Certification

FERC staff doesn't see how a one-time action such as certification replaces requirements that are in place on a perpetual basis.

k. TOP-001-2, Deletion of Requirement that Provided Operational Authority to Transmission Operator

FERC staff feels that this requirement provided the Transmission Operator with the operational authority they need to do their job. Staff doesn't agree with the SDT's position that explicit assignment of responsibilities in each requirement now covers this item.

l. Adherence to Order 693 Directives

FERC staff is concerned about Order 693 directives getting lost in the shuffle with the major re-write of the TOP standards that is being proposed.

### 3. Resolution

FERC staff pointed out that the SDT and NERC need to fully explain the positions that are being taken when the SDT is offering alternative solutions. The alternates must maintain or enhance reliability. The filing document should cover all of the items identified today and the emphasis should be on reliability.

### 4. Adjourn

The meeting was adjourned at 12:00 p.m. ET.