

Meeting Notes

Project 2009-02 Real-time Monitoring and Analysis Capabilities Standard Drafting Team

November 12, 2015 | 10:30 a.m. – 5:00 p.m. Mountain
November 13, 2015 | 8:30 a.m. – 3:00 p.m. Mountain

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Administrative

1. Introductions

The chair called the meeting to order at 10:30 a.m. Mountain, November 12, 2015. Participants were:

Members			
Name	Company	Name	Company
Saad Malik	Peak Reliability	Alan Martin (Remote)	Southern Company Transmission
Andrew Pankratz (Remote)	Florida Power & Light	Bert Peters	APS
Charles Abell	Ameren	Scott Aclin	SPP
Phil Hart	AECI	Mark Olson	NERC
Observers			
Name	Company	Name	Company
Darrell Piatt	FERC	Bruce Larsen (Remote)	WE Energy
Lauren Perotti (Remote)	NERC	Ali Miremadi (Remote)	CAISO
Robert Staton	Xcel Energy	Jim Kleitsch (Remote)	ATC

Members			
Name	Company	Name	Company
Michal Cruz-montes (Remote)	Centerpoint	David Bueche (Remote)	Centerpoint
Dennis Sauriol (Remote)	AEP	Chris Colson	WAPA

2. Determination of Quorum

The rule for NERC Standard Drafting Team (SDT or team) states that a quorum requires two-thirds of the voting members of the SDT. Quorum was achieved with 7 of 10 total members participating.

3. NERC Antitrust Compliance Guidelines and Public Announcement

NERC Antitrust Compliance Guidelines and public announcement were reviewed by Mark Olson. There were no questions raised. Participant conduct policy was reviewed.

Agenda

1. Chair Remarks

Saad Malik opened the meeting and reviewed the agenda.

2. Initial ballot results.

Participants reviewed results from the initial ballots.

3. Review comments from first posting and consider revisions to the draft standards, Implementation Plan, Violation Risk Factors (VRFs), and Violation Severity Levels (VSLs).

Participants reviewed all comments submitted during the formal comment period. Draft responses were discussed. The team considered the following specific issues.

- a. **Clarify what is meant by 'Quality of Analysis' in the standards.** The SDT agreed to clarifications in the Rationale and guidelines and technical basis section of the standards. The SDT agreed to change 'maintain' to 'address' throughout the revised standards.
- b. **Compliance with requirements for individual data points.** The SDT considered feedback regarding requirements to display data and analysis quality. To address concerns that evidence of compliance for each and every data point was burdensome, the SDT revised the standards to incorporate provisions for operator notification of data and analysis quality within the operating procedures.
- c. **Scope of data to be addressed in the Operating Procedures.** The SDT discussed concerns that the proposed requirements could saturate the operator with information or required actions for data that does not impact reliability. The SDT revised the requirements to clearly establish the scope in terms of effect on the Real-time Assessment.
- d. **Compel data-providing entities to address quality issues.** The SDT determined that IRO-010-1a and proposed IRO-010-2 and TOP-003-3 address these concerns.
- e. **Types of data quality issues.** The SDT moved the list of data quality issues from parts 1.1 - 1.4 to the Guidelines section of the standard to address stakeholder concerns that the requirement was overly

prescriptive and not all of the listed types would apply to all applicable entities. The SDT agreed that the phrase 'but not limited to' should be removed.

- f. **Independent alarm process monitor.** The SDT removed the term 'independent' from the requirement since the reliability objective is described in the full requirement. The SDT made clarifications to the rationale box and guidelines section.
 - g. **Combine Requirements.** The agreed that some requirements could be combined and made changes accordingly. The SDT did not agree with combining the two standards because the TOP and IRO standards do not follow that construct.
 - h. **Establish quality benchmarks.** The SDT did not support more prescriptive requirements because there is significant diversity in the needs, tools, and capabilities throughout the industry. The SDT believes appropriately tailored operating procedures as specified in the proposed requirements will achieve the needed reliability benefits.
 - i. **Impact on third-party Real-time Assessments.** The SDT determined that the proposed requirements do not restrict entities from using third-parties to perform RTA.
 - j. **Balancing Authority requirements.** The SDT discussed proposed requirements for BA and requirements contained in proposed BAL-005-1. The SDT agreed that the scope of BA requirements to address data and analysis quality in proposed TOP-010-1 is aligned with TOP and IRO standards. In contrast, BAL-005-1 is limited to reporting ACE. Accordingly, the requirements are not duplicative.
 - k. **Alternative to standards.** The SDT discussed comments that suggested standards were not necessary. The SDT maintained that the certification program by itself would not ensure the reliability objectives were maintained on a day-to-day basis.
 - l. **Critical Equipment.** The SDT considered comments and maintained that requirements to perform monitoring are addressed in other standards and not in scope for this project.
 - m. **Cybersecurity.** The SDT considered comments and maintained that the requirements do not negatively impact compliance with cybersecurity standards or create a cybersecurity risk.
 - n. **VSLs.** The SDT established additional VSLs to describe degrees of compliance.
 - o. **Time horizons.** The SDT agreed that all requirements should be satisfied in Real-time and has removed same-day operations.
 - p. **Evidence Retention Periods.** The SDT determined that the evidence retention periods were consistent with other TOP and IRO standards and did not agree with recommendations to revise.
 - q. **Implementation Plan.** The SDT simplified the implementation plan in response to comments, such that all requirements become effective 18 months following regulatory approval. The SDT did not agree with commenters that said this period was too short because the SDT does not believe compliance will require entities to procure new EMS. The SDT did not agree with commenters that indicated a shorter implementation period could be justified by the current use of monitoring and analysis tools in the industry.
 - r. **Clarity.** The SDT incorporated various additions to rationale and guidelines sections to address stakeholder concerns with clarity and enforceability.
4. **Review revised draft standards, Implementation Plan, VRFs, and VSLs.** The SDT agreed upon changes to address issues discussed above. The SDT agreed to proceed with Quality Review.

5. **Discuss next steps and project schedule.** The SDT agreed to begin a 45-day comment period in December. A conference call would be held prior to posting to discuss proposed changes from QR and to finalize responses to comments.
6. **Communications plan was discussed.**
 - a. The SDT discussed engaging regional standing committees, NERC EMS working group, the ISO-RTO Council, EEI Reliability Task Force, and the NERC Operating Committee. Opportunities to discuss the project with IEEE were discussed.
7. **The chair adjourned the meeting at 2:00 pm November 13, 2015.**