NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

July 26, 2011

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

NERC Standards Report, Status and Timetable for Addressing Regulatory Directives

Dear Ms. Bose,

The North American Electric Reliability Corporation ("NERC") hereby submits the NERC Standards Report, Status and Timetable for Addressing Regulatory Directives in accordance with Section 321.6 of the NERC Rules of Procedure ("Rule 321") that was approved by the Federal Energy Regulatory Commission ("FERC" or "Commission") on March 17, 2011. This is the inaugural report summarizing the progress made, and plans for addressing the standards-related directives received from applicable ERO governmental authorities ("Directives Report"). Because the Commission's Order approving Rule 321 was not issued until March 17, 2011, NERC is submitting this Directives Report after the March 31 deadline established in the NERC Rules of Procedure. Henceforth, this report shall be submitted to the Commission and other ERO governmental authorities on or before March 31 of each year.

Since NERC became the ERO, the Commission has issued 44 Orders containing approximately 655 directives related to NERC Reliability Standards. The majority of the directives, 428, were issued in 2007. Since that time, the number of directives issued by FERC has averaged 72 a year. Of the approximately 655 directives issued since 2007, NERC has initiated and completed projects associated with 44% of these directives and continues to make substantial progress in addressing the remaining directives focusing first on those that have the greatest impact on reliability. As discussed at the February 8, 2011 FERC Technical Conference, both FERC and NERC agree there is a need to establish priorities related to standards to ensure those issues most directly impacting reliability are addressed first. NERC and FERC staffs have been working to create a record of the status and develop a timeline for completion of each directive.

While many directives are clearly stated, some are difficult to delineate or quantify. Therefore, NERC and FERC staffs initiated a coordinated effort in August 2010 to reach an agreed-upon "accounting" to identify and catalog the directives issued by the Commission. As of the date of this filing, this coordination project is approximately 50% complete. Accordingly, the statistics contained in the report regarding the number of standards-related directives are preliminary and likely to change.

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Not all directives are the same. A significant number of the directives order NERC — as the FERC-approved Electric Reliability Organization (ERO) — to submit or modify a Reliability Standard that addresses a specific matter, as is authorized by Section 215(d)(5) of the Federal Power Act. Other directives order NERC to make changes in its procedural rules. Still other directives order NERC to consider the views of various commenters when NERC next revises a particular Reliability Standard. Other issues regarding accounting for the number of directives and their status remain. Some duplicate directives that appear in both the body and the summary of a FERC order or rule or appear in subsequent orders have been double-counted in this report. In this report these substantive, procedural, and duplicative directives are comingled in the directive counts. Working with FERC, NERC intends to submit a clearer, more accurate accounting for the next annual report to be submitted in March 2012.

The report is divided into three sections. The first section, "Status of Directives Issued Since January 1, 2007" summarizes the directives issued to NERC addressing standards development, along with the status of each directive and NERC's progress in addressing that directive. The second section of this report summarizes NERC's plans for addressing those directives which have not been fully resolved with FERC. The third section includes the following appendices to aid in understanding the specific regulatory directives received to date and the projects assigned to address those directives:

- Appendix A - List of FERC Orders and Number of Associated Directives
- Appendix B - Standards Issues Database Sorted Chronologically by FERC Order
- Appendix C - Standards Issue Database Sorted by Project

Please contact me if you have questions or need additional information.

/s/ Andrew M. Dressel
Andrew M. Dressel
Attorney
North American Electric Reliability Corporation

NERC

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NERC Standards Report Status and Timetable for Addressing Regulatory Directives

July 2011

to ensure the reliability of the bulk power system

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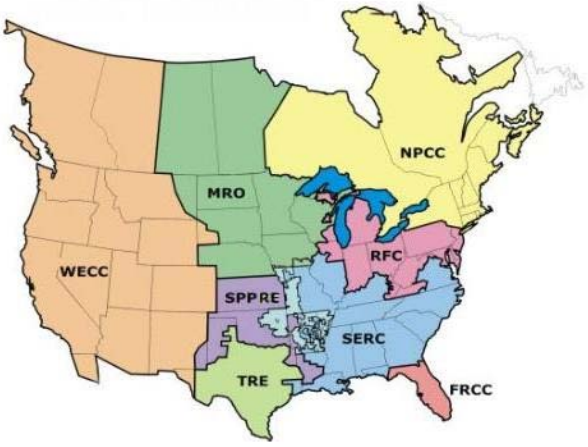
to ensure
the **reliability** of the
bulk power system

NERC's Mission

The North American Electric Reliability Corporation (NERC) is an international regulatory authority established to evaluate reliability of the bulk power system (BPS) in North America. NERC develops and enforces Reliability Standards; assesses adequacy annually via a 10-year forecast and winter and summer forecasts; monitors the bulk power system; and educates, trains, and certifies industry personnel. NERC is the electric reliability organization for North America, subject to oversight by the U.S. Federal Energy Regulatory Commission ("FERC" or "the Commission") and governmental authorities in Canada.[1]

NERC assesses and reports on the reliability and adequacy of the North American BPS, which is divided into eight Regional areas, as shown on the map and in the table below. The users, owners, and operators of the BPS within these areas account for virtually all the electricity supplied in the U.S., Canada, and a portion of Baja California Norte, México.

NERC Reliability Standards are central to establishing the accountability of the industry for reliable performance because they define the reliability requirements for planning, operating and protecting the North American bulk power system. The NERC American National Standards Institute (ANSI)-accredited standards development process is defined in the Standard Processes Manual. The Reliability Functional Model defines the functions that need to be performed to ensure the BPS operates reliably, and is the foundation upon which the Reliability Standards are based.



Note: The highlighted area between SPP and SERC denotes overlapping Regional area boundaries. For example, some load serving entities participate in one Region and their associated

NERC Regional Entities	
FRCC Florida Reliability Coordinating Council	**SERC** SERC Reliability Corporation
MRO Midwest Reliability Organization	**SPP RE** Southwest Power Pool Regional Entity
NPCC Northeast Power Coordinating Council	**TRE** Texas Reliability Entity
RFC Reliability*First* Corporation	**WECC** Western Electricity Coordinating Council

[1] As of June 18, 2007, FERC granted NERC the legal authority to enforce Reliability Standards with all U.S. users, owners, and operators of the bulk power system (BPS), and made compliance with those standards mandatory and enforceable. In Canada, NERC presently has memorandums of understanding in place with provincial authorities in Ontario, New Brunswick, Nova Scotia, Québec, and Saskatchewan, and with the Canadian National Energy Board. NERC standards are mandatory and enforceable in Ontario and New Brunswick as a matter of provincial law. NERC has an agreement with Manitoba Hydro making Reliability Standards mandatory for that entity, and Manitoba has recently adopted legislation setting out a framework for standards to become mandatory for users, owners, and operators in that province. In addition, NERC has been designated as the "electric reliability organization" under Alberta's Transportation Regulation, and certain Reliability Standards have been approved in that jurisdiction; others are pending. NERC and NPCC have been recognized as standards-setting bodies by the *Régie de l'énergie* of Québec, and Québec has the framework in place for Reliability Standards to become mandatory. Nova Scotia and British Columbia also have frameworks in place for Reliability Standards to become mandatory and enforceable. NERC is working with the other governmental authorities in Canada to achieve equivalent recognition.

transmission owners/operators in another.

Table of Contents

Introduction

Background

NERC Reliability Standards are a portfolio of performance, risk, and competency-based mandatory requirements that collectively provide a defense-in-depth structure for reliably planning, operating and protecting the North American bulk power system (BPS). NERC's standards hold all users, owners, and operators of the BPS accountable for meeting specific reliability-related performance.

NERC staff works with the Standards Committee, electric power industry experts, and applicable regulatory and governmental authorities in the United States and Canada in implementing the standards development projects identified in the Reliability Standard Development Plan, following the Standard Processes Manual.

NERC's Reliability Standards are an essential tool in ensuring that the North American bulk power system is operated, maintained, and protected in a manner that supports all other services essential to health, safety, and financial security.
The *NERC Standard Processes Manual* details the ANSI accredited process for reliability standards development and revision. The standards development process is reliant on active stakeholder participation in drafting and approving each reliability standard.

Regulators have the ability to issue directives to NERC and the industry for further development of standards where the regulator in its judgment feels further development is warranted. This report provides an assessment of the status of the electric reliability organization (ERO) in fulfilling its duties related to the regulatory directives issued.

Section 321.6 of NERC's Rules of Procedure (ROP) requires NERC to file a report with applicable governmental authorities on the status and timetable for addressing each outstanding regulatory directive to resolve a specific matter received from an applicable ERO governmental authority. This report is developed in fulfillment of the requirements of Section 321.6 of NERC's Rules of Procedure.

Organization of this Report

This is the inaugural report summarizing the progress made, and plans for identifying and addressing the standards-related directives received from applicable governmental authorities. To date, FERC is the only governmental authority to issue any standards-related directives to NERC.

This report includes standards-related activities through the first six months of 2011. Future reports will be developed on a calendar year basis and will be submitted to FERC on or before March 31 of each year.

This report is divided into three sections. The first section, "Status of Directives Issued Since January 1, 2007" summarizes the directives issued to NERC related to standards development, along with the status of each directive with respect to NERC's progress in responding to each directive. The second section of this report summarizes NERC's plans for processing directives that have not been filed with the

Commission. The third section includes the following appendices to aid in understanding the specific regulatory directives received to date and the projects assigned to resolve those directives:

- Appendix A - List of FERC Orders and Number of Associated Directives
- Appendix B - Standards Issues Database Sorted Chronologically by FERC Order
- Appendix C - Standards Issue Database Sorted by Project

The foundation for the statistics provided in this report is contained in the NERC Standards Issues Database (Issues Database). The Issues Database is a dynamic, regularly-updated *Access* database that has evolved since the Commission's Order No. 693.

The understanding of what constitutes a directive within any particular regulatory order is, in some instances, subjective. NERC and FERC staff initiated a project in August 2010 to resolve the "accounting" for directives by working together to identify and catalog the directives issued by the Commission. The purpose of the project is to reach agreement on a set of directives and then identify the precise nature of, and catalog the status of, each directive. As of the date of this report the project completed about half of the tasks of identifying the directives and assessing the status of those directives. Therefore, the statistics contained in this report regarding the number of standards related directives are preliminary and are likely to change.

Not all directives are the same. A significant number of the directives order NERC — as the FERC-approved Electric Reliability Organization (ERO) — to submit or modify a Reliability Standard that addresses a specific matter, as is authorized by Section 215(d)(5) of the Federal Power Act. Other directives order NERC to make changes in its procedural rules. Still other directives order NERC to consider the views of various commenters when NERC next revises a particular Reliability Standard. Other issues regarding accounting for the number of directives and their status remain. Some duplicate directives that appear in both the body and the summary of a FERC order or rule or appear in subsequent orders have been double-counted in this report. In this report these substantive, procedural, and duplicative directives are comingled in the directive counts. Working with FERC, NERC intends to submit a clearer, more accurate accounting for the next annual report to be submitted in March 2012.

As discussed at the February 8, 2011 FERC Technical Conference, both FERC and NERC agree there is a need to establish priorities related to standards to ensure those issues most directly impacting reliability are addressed first. This report, while marking a significant step forward in quantifying the outstanding directives that NERC must address, does not adequately differentiate the importance of these outstanding directives. Working with FERC and other ERO Governmental Authorities, NERC expects to resolve these issues and will deliver a more accurate and complete Rule 321.6 report in 2012.

Processing Directives

NERC processes directives consistent with its Rules of Procedure (including Appendices 3A- *Standard Processes Manual* and 3C *Procedure for Coordinating Reliability Standards*). Specifically, when a regulatory order or rule is issued, that order is reviewed and any directives within the order related to standards development are added to the Issues Database. NERC then seeks to associate each directive with a specific standard (in some instances the directive is placed into a category labeled "Standards Other" meaning that an activity outside of modifying a standard needs to take place to fully respond to the directive, for example, a change to the NERC Rules of Procedure might need to be implemented).

Standards are then placed into a specific standards development project and assigned to an industry-based drafting team. It is then the responsibility of the assigned drafting team to work with other industry stakeholders to respond to (either directly or "equally efficiently and effectively") the directives applicable to that standards development project. As a specific project progresses from Standard Authorization Request (SAR)[1] development through standard development to approval and regulatory filing, it is the responsibility of the assigned NERC Standards Development Coordinator or Advisor to maintain and update the status of each directive associated with that project in the Issues database.

Once a standard has been approved by the NERC Board of Trustees and filed with the applicable regulatory authorities, the status of all the resolved directives associated with the standard for that project are marked "filed" in the Issues Database. If a regulatory authority declares that a directive has not been adequately resolved, the status of the directive will be returned to an "in drafting" status in the Issues Database and will be re-examined the next time the standard is revised as part of another standards development project.

[1] A Standard Authorization Request is the form used to define the scope of a reliability-related standard project.

Status of Directives

Directives Issued by the Commission

In 2007, NERC was designated the ERO by FERC in accordance with Section 215 of the Federal Power Act (FPA), enacted by the Energy Policy Act of 2005. Following approval by FERC, NERC's initial set of Reliability Standards became mandatory and effective within the United States on June 18, 2007.

The FPA and the Commission's subsequent Orders allow the Commission to issue directives to the ERO to respond to the specific issues. Since January 1, 2007, FERC has issued 44 Commission Orders containing approximately 655 directives related to NERC Reliability Standards. **Appendix A** to this report contains a chronological list of Commission Orders that contain standards-related directives. **Appendix B** contains a list of the standards related directives associated with each of the Commission Orders identified in **Appendix A**.

Tabulated by year of issuance, the number of standards related directives issued by the Commission since 2007 is:

Year	Number of Directives Issued
2007	426
2008	80
2009	66
2010	65
2011 (thru June 30)	18
Total	**655**

Table A

Directives Filed With the Commission

The *NERC Reliability Standards Development Plan* is the foundation for Reliability Standards development efforts. The plan serves as the management tool and blueprint that guides, prioritizes, and coordinates revision or retirement of Reliability Standards and the development of new Reliability Standards for the immediate 3-year time horizon.

In compliance with the *Standard Processes Manual*, the Standards Committee manages the NERC standards development process for the continent-wide Reliability Standards with the support of NERC staff to achieve broad BPS reliability goals for the industry. The Standards Committee protects the integrity and credibility of the standards development process.

It is the joint responsibility of NERC staff and the NERC Standards Committee to ensure every regulatory directive related to standards development received by NERC is adequately addressed. Of the 655 directives issued since 2007, NERC has completed projects associated with 290, or 44%, of the directives as summarized in **Table B** below.

Year	Number of Directives Filed
2007	39
2008	80
2009	125
2010	46
Total	**290**

Table B

In addition, consistent with the *NERC Reliability Standards Development Plan*, NERC anticipates completing projects associated with at least 204 additional directives by the end of 2013. **Appendix C** identifies the directives associated with each of the NERC standards development projects identified as high priority in the *Reliability Standards Development Plan* and anticipated to be completed by the end of 2013. The projects identified in **Appendix C** provide the basis for the forecast of those directives anticipated to be filed with the applicable regulatory authorities over the next three years as summarized in **Table C** below.

Year	Number of Directives Forecast to be Filed
2011 (fcst)	124
2012 (fcst)	45
2013 (fcst)	35
Total	**204**

Table C

Summary of Issued and Filed Directives

The number of directives issued by the Commission by year and the number of directives filed with the Commission are captured in the "waterfall chart" (**Chart 1**) below. As shown in **Chart 1**, the number of directives issued by the Commission in any particular year causes the total number of outstanding directives to increase. Conversely, the number of directives processed and filed with the Commission by NERC causes the total number of outstanding directives for a given year to decrease.

In **Chart 1**, the brown columns show the number of directives issued in each year, and the blue columns show the number of directives addressed within the standards development process and filed for approval each year. For example, as shown in **Chart 1**, the Commission issued Orders containing a total of 426 directives in 2007, 80 directives in 2008, and 66 directives in 2009. NERC submitted new or revised standards to the Commission responding to 39 directives in 2007, 80 directives in 2008, and 125 directives in 2009. By the end of 2009, NERC was able to initiate and complete projects and file new or revised standards that responded to over 40% of the roughly 562 directives issued by the Commission leaving 328 directives outstanding at year-end 2009.

The Number of Directives Issued, Filed, and Forecast

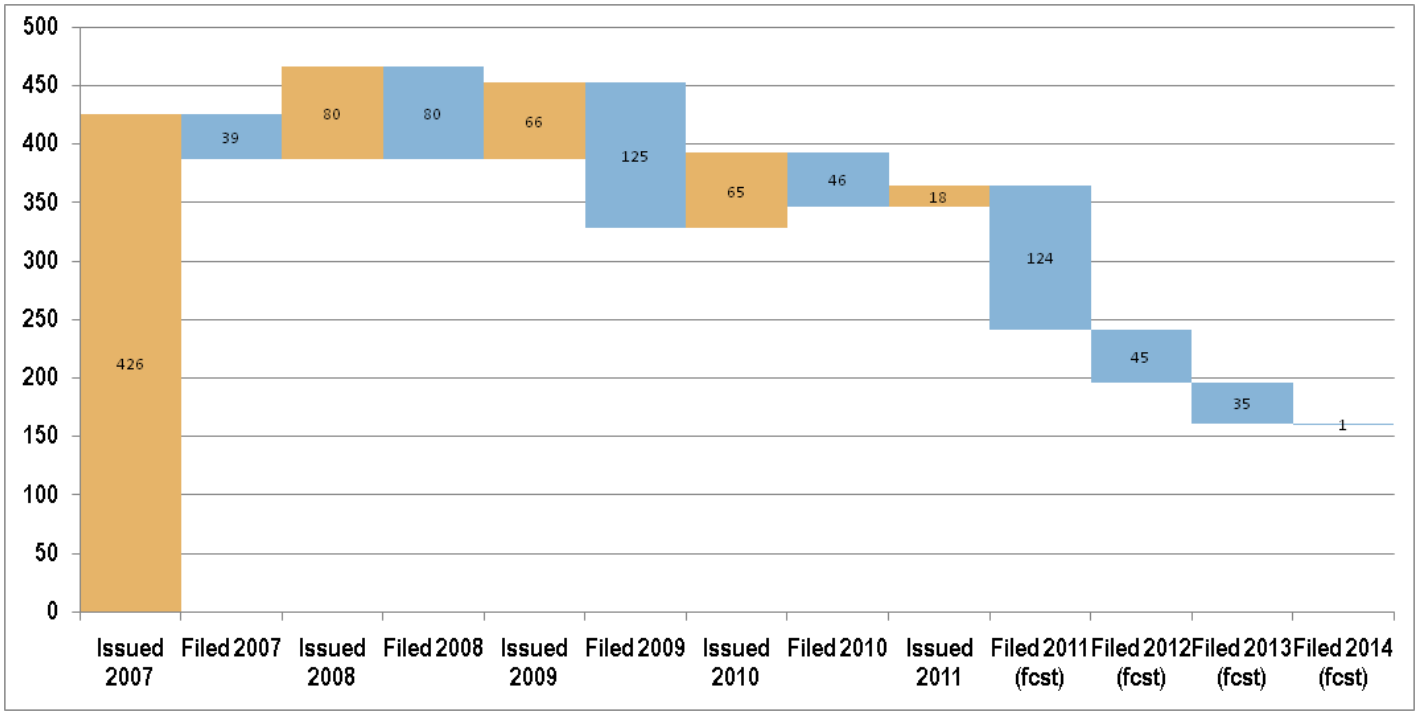


Chart 1

The "declining" shape of the waterfall chart in **Chart 1** demonstrates NERC's progress under its continued effort to respond to directives.

FERC Order 693 Directives

On March 16, 2007, the Commission issued Order No. 693. In the order, the Commission approved 83 of the 107 Reliability Standards initially proposed by NERC for approval. Embedded in the Order were 333 directives requiring improvements to 56 of the approved Reliability Standards. Approximately half of the total standards-related directives issued by the Commission to date were included in Order 693.

NERC began responding to the directives from Order No. 693 immediately after its issuance in 2007. NERC was able to complete projects and file responses to five of the directives by year-end 2007 and another 36, or approximately 10% of the directives, by year-end 2008. Standards responsive to another 33 directives were filed with the Commission in 2009 and 9 additional "Order 693" directives in 2010.

NERC forecasts filing standards responsive to 95 of the "Order 693" directives with the Commission in 2011, an additional 32 directives in 2012, and 35 additional directives in 2013. Based on these forecasts, at the end of 2013, 88 "Order 693" directives will remain outstanding for future standards development projects.

Table D below summarizes NERC's response to the directives from Order 693 in tabular form.

Year	Number of Directives Issued	Number of Directives Filed	Number of Directives Forecast to be Filed
2007	333	5	
2008		36	
2009		33	
2010		9	
2011 (fcst)			95
2012 (fcst)			32
2013 (fcst)			35
Total	**333**	83	162
		Remaining	**88**

Table D

Using the waterfall chart concept, NERC's progress in completing the "Order 693" directives is represented in **Chart 2** below.

FERC Oder 693 Directives Issued, Filed, and Forecast Through 2013

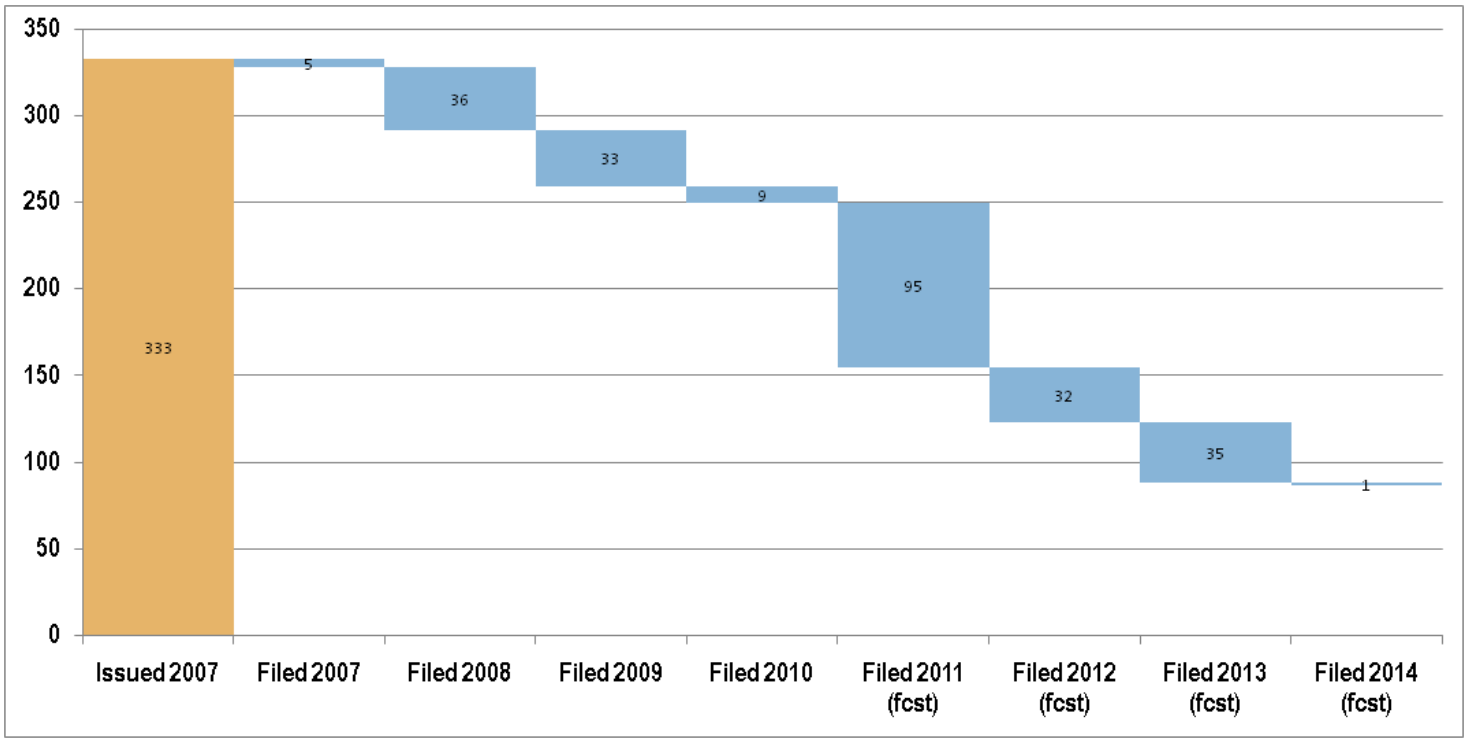


Chart 2

Timeline for Addressing Outstanding Directives

One of NERC's core responsibilities is to ensure the reliability of the BPS by developing effective Reliability Standards that are clear, consistent and technically sound. All BPS owners, operators, and users must comply with these standards, which define the requirements for planning, operating, and protecting the North American electrical grid, so that widespread cascading outages, uncontrolled separations, and blackouts do not occur. NERC's standard development process' success depends on active participation from the industry on drafting teams, during comment periods and in ballot pools. It is the users, owners and operators of the BPS who both develop NERC's mandatory Reliability Standards and implement them to ensure reliability.

NERC is continually working to improve its standard development processes and the quality and technical soundness of the standards it produces. NERC continues to work to respond to all the regulatory directives received in a prioritized methodology giving highest priority on those directives that have the largest beneficial impact on reliability.

Project Prioritization

The *Reliability Standard Development Procedure* that was in effect at the time NERC was appointed as the ERO required the Standards Committee to initiate almost all projects as Standard Authorization Requests were received. This old procedure led to too many projects in development by mid-2010. Simultaneously initiating large number of projects into development tended to extend all project timelines unnecessarily and overwhelmed those that actively participated in the NERC standards development process. A new *Standard Processes Manual* was approved for use in September, 2010, replacing the *Reliability Standard Development Procedure* and giving the Standards Committee the authority to determine when to initiate a new project.

Shortly after the new *Standard Processes Manual* was approved the Standards Committee developed and implemented a methodology to prioritize the standards development project load and focus the available industry resources on a smaller set of high-priority projects emphasizing those projects which have the highest potential impact on reliability. The Standards Committee and NERC staff have jointly worked to develop the prioritization tool, soliciting feedback from the industry, and refining the tool based on that feedback. The prioritization tool was then submitted to the Board of Trustees for review and endorsement after stakeholder comments indicated support for the tool. Early prioritization experimentation using preliminary versions of the tool proved successful. On February 17, 2011, NERC's Board of Trustees endorsed the standards project prioritization tool and on May 13, 2011, NERC submitted an informational filing to FERC containing the results of the prioritization effort.

The prioritization criteria embedded in the tool is a balance among regulatory deadlines, reliability gaps, and known deficiencies of existing standards including the need for additional clarity. Moreover the prioritization tool balances consideration of all the prioritization criteria, resulting in rational decisions about the use of NERC and industry resources.

Priority Project Summary

The projects identified as "High Priority" and "Projects Continuing and Expected to Complete Shortly" in the latest *Reliability Standards Development Plan* were used to develop the three-year forecast for filing standards that respond to outstanding directives. These "High Priority" and "Projects Continuing and Expected to Complete Shortly" projects were active as of June 30, 2011. The list of projects, the year each project is anticipated to be completed, and the approximate number of directives associated with the standards to be revised in conjunction with each of these projects are summarized in **Table E** below.

Projects	Completion (Year)	Associated Directives
High Priority Projects		
Project 2006-02 Assess Transmission and Future Needs	2011	26
Project 2007-02 Operating Personnel Communications Protocols	2013	8
Project 2007-03 Real-time Transmission Operations	2013	31
Project 2007-06 System Protection Coordination	2013	1
Project 2007-09 Generator Verification	2013	9
Project 2007-12 Frequency Response	2011	6
Project 2007-17 Protection System Maintenance & Testing	2012	6
Project 2008-06 Cyber Security - Order 706	2012	34
Project 2009-01 Disturbance and Sabotage Reporting	2012	12
Project 2010-05 Protection Systems	2012	2
Project 2010-07 Generator Requirements at the Transmission Interface	2011	0
Project 2010-17 Definition of Bulk Electric System	2012	5
Projects Continuing and Expected to Complete Shortly		
Project 2006-06 Reliability Coordination	2011	14
Project 2007-07 Vegetation Management	2011	8
Project 2010-13 Relay Loadability Order Phase 1	2011	26
Project 2010-15 Remote Access Urgent Action	2011	0

Table E

The attached **Appendix C** identifies each of the directives associated with each of the standards development projects summarized above in **Table E**.

Future Projects

As standards development projects are completed, new standards development projects will be initiated based on the latest version of the *Reliability Standards Development Plan* and the priority of projects identified in the plan. It is not the intent of this report to forecast which projects will be initiated and therefore what directives will be completed beyond the three-year window covered in the *Reliability Standard Development Plan 2011-2013*.

NERC's intent is to continually respond to the regulatory directives it receives in a prompt and timely manner, taking into account all outstanding standards development activities and their potential impact on reliability. NERC staff will continually coordinate with the NERC Standards Committee to give highest priority to those issues with the largest potential improvement to reliability.

Appendix A

List of FERC Orders and Number of Associated Directives as of June 30, 2011

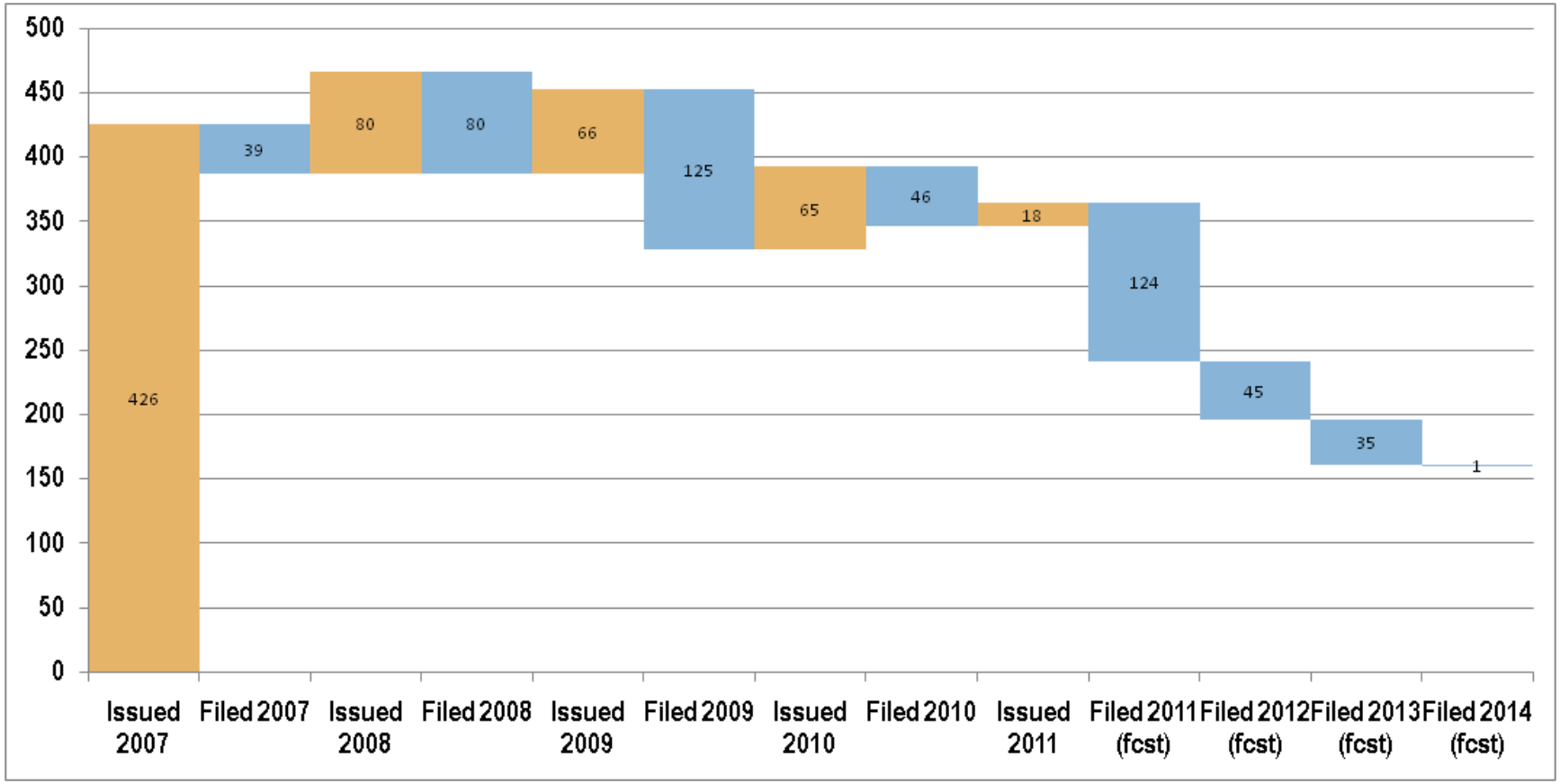
Regulatory Order	Publication Date	Regulatory Order Number	Number of Directives Issued
Order on Compliance Filing	18-Jan-07		16
Preventing Undue Discrimination and Preference in Transmission Service	16-Feb-07	Order 890	29
Mandatory Reliability Standards for the Bulk-Power System	16-Mar-07	Order 693	333
Order on Violation Risk Factors	18-May-07		4
Order on Compliance Filing	07-Jun-07		3
Order Approving Regional Reliability Standards for the Western Interconnection and Directing Modifications (FERC Order in Docket RR07-11 Issued 2007-06-08 - WECC Stds)	08-Jun-07		14
Mandatory Reliability Standards for the Bulk-Power System	19-Jul-07	Order 693-A	2
Order on Compliance Filing	16-Nov-07		12
Facilities Design, Connections and Maintenance Reliability Standards	27-Dec-07	Order 705	12
Mandatory Reliability Standards for Critical Infrastructure Protection	18-Jan-08	Order 706	59
Order Denying Rehearing and Granting Clarification	16-May-08	Order 706-A	2
Order on Violation Severity Levels Proposed by the ERO	19-Jun-08		4
Modification of Interchange and Transmission Loading Relief Reliability Standards; and ERO Interpretation of Specific Requirements of Four Reliability Standards	21-Jul-08	Order 713	2
Mandatory Reliability Standard for Nuclear Plant Interface Coordination	16-Oct-08	Order 716	11
Order on Rehearing and Clarification and Accepting Compliance Filing	20-Nov-08		2
Order on Compliance Filing	27-Jan-09		1
Mandatory Reliability Standards for Critical Infrastructure Protection	19-Mar-09	Order 706-B	3
Modification of Interchange and Transmission Loading Relief Reliability Standards; and ERO Interpretation of Specific Requirements of Four Reliability Standards	19-Mar-09	Order 713-A	2

Regulatory Order	Publication Date	Regulatory Order Number	Number of Directives Issued
Version Two Facilities Design, Connections and Maintenance Reliability Standards	20-Mar-09	Order 722	14
Western Electricity Coordinating Council Regional Reliability Standard Regarding Automatic Time Error Correction	21-May-09	Order 723	5
ERO Interpretations of Specific Requirements of Frequency Response and Bias and Voltage and Reactive Control Reliability Standards	21-May-09		4
Order Approving Revised Reliability Standards for Critical Infrastructure Protection and Requiring Compliance Filing	30-Sep-09		9
Preventing Undue Discrimination and Preference in Transmission Service	19-Nov-09	Order 890-D	1
Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments	24-Nov-09	Order 729	22
Order Denying Rehearing and Granting Clarification	17-Dec-09		5
Order Approving Technical Feasibility Exception Procedures and Ordering Compliance Filing	21-Jan-10		12
Transmission Relay Loadability Reliability Standard	18-Mar-10	Order 733	26
Interpretation of Transmission Planning Reliability Standard	18-Mar-10		1
Order Addressing Compliance Filing and Approving Implementation Plan	18-Mar-10		2
Order Addressing Violation Severity Level Assignments for Critical Infrastructure Protection Reliability Standards	18-Mar-10		5
Order Approving Reliability Standard Interpretation	18-Mar-10		1
Order Directing NERC to Propose Modification of ERO Rules of Procedure	18-Mar-10		4
Order Setting Deadline for Compliance	18-Mar-10		2
Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments	05-May-10	Order 729-A	1
Order Granting Rehearing for Further Consideration and Scheduling Technical Conference	13-May-10		2
Order on the ERO's Three-year Performance Assessment	16-Sep-10		3
System Personnel Training Reliability Standards	18-Nov-10	Order 742	2
Revision to ERO Definition of BES	18-Nov-10	Order 743	5

Regulatory Order	Publication Date	Regulatory Order Number	Number of Directives Issued
Order Approving Reliability Standards Docket RD10-04-000	06-Jan-11		1
System Restoration	17-Mar-11	Order 749	2
Final Rule Approving Planning Resource Adequacy Assessment Standard BAL-502-RFC-02	17-Mar-11	Order 747	2
Final Rule Approving Interconnection Reliability Operating Limits Standards	17-Mar-11	Order 748	2
Final Rule on Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive	17-Mar-11	Order 751	7
Order 752	17-Mar-11	Order 752	4
Total			**655**

Appendix B

Standards Issues Database Sorted Chronologically by FERC Order as of June 30, 2011



All Directives Report

FERC - Order on Compliance Filing

Issued 1/18/2007

DIRECTIVE: S-directed to include in its first performance assessment three years from the date of certification a report analyzing the length of time taken to develop a new or modified Reliability Standard from the submission of a SAR through approval of a Reliabili

Para (D)

"directed to include in its first performance assessment three years from the date of certification a report analyzing the length of time taken to develop a new or modified Reliability Standard from the submission of a SAR through approval of a Reliability Standard by the ERO board, as discussed herein."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-submit an additional compliance filing within 60 days of the issuance of this order, and a quarterly report on the balloting results of its Reliability Standards Development Process.

Para 1

"submit an additional compliance filing within 60 days of the issuance of this order, and a quarterly report on the balloting results of its Reliability Standards Development Process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-The ERO must address the issue of whether an adequate level of reliability can be defined to partly or wholly apply to all Reliability Standards, whether it can be defined for certain sets of Reliability Standards (BAL, FAC etc.), or whether, in some in

Para 16

"The ERO must address the issue of whether an adequate level of reliability can be defined to partly or wholly apply to all Reliability Standards, whether it can be defined for certain sets of Reliability Standards (BAL, FAC etc.), or whether, in some instances, it must be tailored to each individual Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-The ERO must consider opportunities to develop and apply metrics that can form the basis for broadly defining an adequate level of reliability, such as the creation of a precisely defined set of system operating states.

Para 16

"The ERO must consider opportunities to develop and apply metrics that can form the basis for broadly defining an adequate level of reliability, such as the creation of a precisely defined set of system operating states."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct the ERO to develop a work plan to propose a continuing improvement process to consider adequate level of reliability when developing new or modified Reliability Standards.

Para 16

"direct the ERO to develop a work plan to propose a continuing improvement process to consider adequate level of reliability when developing new or modified Reliability Standards."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-report to us quarterly for the next three years its analysis of the voting results, including trends and patterns that may signal a need for improvement in the voting process, such as the balloting down of a Reliability Standard and subsequent ballot ap

Para 18

"report to us quarterly for the next three years its analysis of the voting results, including trends and patterns that may signal a need for improvement in the voting process, such as the balloting down of a Reliability Standard and subsequent ballot approval of a less stringent version of the Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directed to revise the emergency action process to make it clear that, when the Commission determines that extraordinary circumstances exist, NERC must invoke its emergency action process without NERC board discretion to overrule that determination.

Para 28

"directed to revise the emergency action process to make it clear that, when the Commission determines that extraordinary circumstances exist, NERC must invoke its emergency action process without NERC board discretion to overrule that determination."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to modify both the regular and expedited Reliability Standard development procedures to explicitly provide for timely adherence to a Commission-imposed deadline.

Para 28

"directs NERC to modify both the regular and expedited Reliability Standard development procedures to explicitly provide for timely adherence to a Commission-imposed deadline."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct that NERC revise the proposed expedited urgent action process to (1) provide for the expedited development of a Reliability Standard in extraordinary circumstances without the limitation on when it can be invoked by the Commission and (2) incorpo

Para 28

"direct that NERC revise the proposed expedited urgent action process to (1) provide for the expedited development of a Reliability Standard in extraordinary circumstances without the limitation on when it can be invoked by the Commission and (2) incorporate the ability to adjust the timeliness of the process to meet a Commission-imposed deadline and still allow for due process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct NERC to revise its Reliability Standard development procedure to clearly indicate how it will initiate the development of a new or revised Reliability Standard in response to a Commission directive separate from the SAR process.

Para 29

"direct NERC to revise its Reliability Standard development procedure to clearly indicate how it will initiate the development of a new or revised Reliability Standard in response to a Commission directive separate from the SAR process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct the ERO to monitor the length of time taken to develop a new or modified Reliability Standard from the submission of a SAR through approval of a Reliability Standard by the ERO board.

Para 31

"direct the ERO to monitor the length of time taken to develop a new or modified Reliability Standard from the submission of a SAR through approval of a Reliability Standard by the ERO board."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-submit a report as part of its performance assessment at the three year anniversary of the certification of the ERO that identifies how long each new Reliability Standard or modification under development has taken up to that point. The report should al

Para 31

"submit a report as part of its performance assessment at the three year anniversary of the certification of the ERO that identifies how long each new Reliability Standard or modification under development has taken up to that point. The report should also include an analysis of the reasons for delay and any patterns of delay in developing timely Reliability Standards or modifications to Reliability Standards. The ERO should address the Commissions expressed concerns and specific orders for new or modified Reliability Standards, and compare progress with the EROs Reliability Standards development work plan. The ERO should discuss in this report the effectiveness of the current Reliability Standards development process with regard to the timely development of Reliability Standards, and, if problems are uncovered, identify possible resolutions including possible changes to its process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs NERC to modify section 306 so that the compliance and certification committee is responsible for monitoring NERCs compliance regarding Reliability Standards development.

Para 63

"directs NERC to modify section 306 so that the compliance and certification committee is responsible for monitoring NERCs compliance regarding Reliability Standards development."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct that NERC modify its Rules of Procedure to provide that the ERO will comply with each Reliability Standard that identifies the ERO as an applicable entity, identify the component of NERC that will monitor NERCs compliance with such standards, and

Para 65

"direct that NERC modify its Rules of Procedure to provide that the ERO will comply with each Reliability Standard that identifies the ERO as an applicable entity, identify the component of NERC that will monitor NERCs compliance with such standards, and state that non-compliance would constitute a violation of NERCs Rules of Procedure and subject NERC to any consequences of such a violation."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct NERC to develop the Violation Risk Factors through the procedure described in section 1400 of its Rules of Procedure.

Para 91

"direct NERC to develop the Violation Risk Factors through the procedure described in section 1400 of its Rules of Procedure."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directed to file with the Commission quarterly reports for the next three years, within 30 days of the end of each quarterly period, beginning with the first quarter of 2007, on voting results in the Reliability Standard development process, as discusse

Para C

"directed to file with the Commission quarterly reports for the next three years, within 30 days of the end of each quarterly period, beginning with the first quarter of 2007, on voting results in the Reliability Standard development process, as discussed herein."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

FERC - Preventing Undue Discrimination and Preference in Transmission Service (Order 890)

Issued 2/16/2007

DIRECTIVE: S- Ref 10249 - While changes requiring a reevaluation of CBM are longer-term in nature (e.g., installation of a new generator or a long-term outage), quarterly may be too frequent, though two years may be too long and may prevent a portion of the CBM seta

Para 204

"While changes requiring a reevaluation of CBM are longer-term in nature (e.g., installation of a new generator or a long-term outage), quarterly may be too frequent, though two years may be too long and may prevent a portion of the CBM setaside from being released as ATC. Moreover, annual reevaluation is consistent with the current NERC standard being developed in MOD-005.205 The requirement to evaluate

CBM at least every year also is consistent with the CBM Order in that the Commission directed transmission providers to periodically reevaluate their generation reliability needs so as to make known the need for CBM and to post on OASIS their practices in this regard."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10187 - As TDU Systems note, there is neither a definition of AFC in NERCs Glossary nor an existing reliability standard that discusses the AFC method. In order to achieve consistency in each component of the ATC calculation (discussed below), we d

Para 211

"As TDU Systems note, there is neither a definition of AFC in NERCs Glossary nor an existing reliability standard that discusses the AFC method. In order to achieve consistency in each component of the ATC calculation (discussed below), we direct public utilities, working through NERC, to develop an AFC definition and requirements used to identify a particular set of transmission facilities as a flowgate. However, we remind transmission providers that our regulations require the posting of ATC values associated with a particular path, not AFC values associated with a flowgate. Transmission providers using an AFC methodology must therefore convert flowgate (AFC) values into path (ATC) values for OASIS posting. In order to have consistent posting of the ATC, TTC, CBM, and TRM values on OASIS, we direct public utilities, working through NERC, to develop in the MOD-001 standard a rule to convert AFC into ATC values to be used by transmission providers that currently use the flowgate methodology."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10188 - The Commission also believes that further clarification is necessary regarding the calculation algorithms for firm and non-firm ATC.150 Currently, NERC has no standards for calculating non-firm ATC. We find that the same potential for discr

Para 212

"The Commission also believes that further clarification is necessary regarding the calculation algorithms for firm and non-firm ATC.150 Currently, NERC has no standards for calculating non-firm ATC. We find that the same potential for discrimination exists for non-firm transmission service as for firm service and that greater uniformity in both firm and non-firm ATC calculations will substantially reduce the remaining potential for undue discrimination. Therefore, we direct public utilities, working through NERC, to modify related ATC standards by implementing the following principles for firm and non-firm ATC calculations: (1) for firm ATC calculations, the transmission provider shall account only for firm commitments; and (2) for non-firm ATC calculations, the transmission provider shall account for both firm and non-firm commitments, postbacks of redirected services, unscheduled service, and counterflows. We understand that these principles are currently followed by most transmission providers and believe they should be clearly set forth in the ATC-related reliability standards. As described below, each transmission providers Attachment C must include a detailed formula for both firm and non-firm ATC, consistent with the modified ATC-related reliability standards."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10189 - With respect to a timeline for completion, the Commission concurs with NERC that a significant amount of work remains to be done on ATC-related reliability standards development. We also agree with the many commenters who state that the NOP

Para 223

"With respect to a timeline for completion, the Commission concurs with NERC that a significant amount of work remains to be done on ATC-related reliability standards development. We also agree with the many commenters who state that the NOPRs proposed six-month timeline is too short for such a complex assignment. Although NERC projects that it may be able to complete the process by the summer of 2007 (which is approximately six months from the date of the Final Rule), we believe

NERC should have additional flexibility with respect to its timeline. Accordingly, we direct public utilities, working through NERC, to modify the ATC-related reliability standards within 270 days after the publication of the Final Rule in the Federal Register. We also direct public utilities to work through NAESB to develop business practices that complement NERCs new reliability standards within 360 days after the publication of the Final Rule in the Federal Register. Finally, we direct NERC and

NAESB to file, within 90 days of publication of the Final Rule in the Federal Register, a joint status report on standards and business practices development and a work plan for completion of this task within the timeframe established above.160"

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10190 - The Commission adopts the NOPR proposal and directs public utilities, working through NERC, to develop consistent practices for calculating TTC/TFC. We direct public utilities, working through NERC, to address, through the reliability stand

Para 237

"The Commission adopts the NOPR proposal and directs public utilities, working through NERC, to develop consistent practices for calculating TTC/TFC. We direct public utilities, working through NERC, to address, through the reliability standards process, any differences in developing TTC/TFC for transmission provided under the pro forma OATT and for transfer capability for native load and reliability assessment studies."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10191 - To achieve greater consistency in ETC calculations and further reduce the potential for undue discrimination, the Commission adopts the NOPR proposal and directs public utilities, working through NERC and NAESB, to develop a consistent appr

Para 243

"To achieve greater consistency in ETC calculations and further reduce the potential for undue discrimination, the Commission adopts the NOPR proposal and directs public utilities, working through NERC and NAESB, to develop a consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses. We expect that NERC will address ETC through the MOD-001 reliability standard rather than through a separate reliability standard.169 By using MOD-001, the ETC calculation can be adjusted to be applicable to each of the three ATC methodologies under development by NERC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10192 - In order to provide specific direction to public utilities and NERC, we determine that ETC should be defined to include committed uses of the transmission system,including (1) native load commitments (including network service), (2) grandfa

Para 244

"In order to provide specific direction to public utilities and NERC, we determine that ETC should be defined to include committed uses of the transmission system,including (1) native load commitments (including network service), (2) grandfathered transmission rights, (3) appropriate point-to-point reservations,170 (4) rollover rights associated with long-term firm service, and (5) other uses identified through the NERC process. ETC should not be used to set aside transfer capability for any type of planning or contingency reserve, which are to be addressed through CBM and TRM.171 In addition, in the short-term ATC calculation, all reserved but unused transfer capability (non-scheduled) shall be released as non-firm ATC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10193 - We agree with TDU Systems that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. We therefore find that reservations that have the same point of receipt (POR) (generator

Para 245

"We agree with TDU Systems that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. We therefore find that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the

ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generators nameplate capacity at POR. This will prevent overly unrealistic utilization of transmission capacity associated with power output from a generator identified as a POR. We direct public utilities, working through NERC, to develop requirements in MOD-001 that lay out clear instructions on how these reservations should be accounted. One approach that could be used is examining historical patterns of

actual reservation use during a particular season, month, or time of day."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10239 - The Commission concludes that it is appropriate to allow LSEs to retain the option of setting aside transfer capability in the form of CBM to maintain their generation reliability requirement. We agree with commenters that, without CBM, LSE

Para 256

"The Commission concludes that it is appropriate to allow LSEs to retain the option of setting aside transfer capability in the form of CBM to maintain their generation reliability requirement. We agree with commenters that, without CBM, LSEs would have to increase their generation reserve margins by contracting for generation capacity,

which may result in higher costs without additional reliability benefits. We require, however, the development of standards for how CBM is determined, allocated across transmission paths, and used in order to limit misuse of transfer capability set aside as CBM. Transmission providers also must reflect the set-aside of transfer capability as

CBM in the development of the rate for point-to-point transmission service to ensure comparable treatment for point-to-point to customers."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10241 - The Commission therefore adopts a combination of the NOPR options one and two, and declines to adopt option three. First, we require public utilities, working through NERC and NAESB, to develop clear standards for how the CBM value shall be

Para 257

"The Commission therefore adopts a combination of the NOPR options one and two, and declines to adopt option three. First, we require public utilities, working through NERC and NAESB, to develop clear standards for how the CBM value shall be determined, allocated across transmission paths, and used. We understand that NERC has already begun the process of modifying several of the CBM-related reliability

standards and that the drafting process is a joint project with NAESB. Second, we require transmission providers to reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10242 - To ensure CBM is used for its intended purpose, CBM shall only be used to allow an LSE to meet its generation reliability criteria. Consistent with Dukes statement, we clarify that each LSE within a transmission providers control area has t

Para 259

"To ensure CBM is used for its intended purpose, CBM shall only be used to allow an LSE to meet its generation reliability criteria. Consistent with Dukes statement, we clarify that each LSE within a transmission providers control area has the right to request the transmission provider to set aside transfer capability as CBM for the LSE to meet its historical, state, RTO, or regional generation reliability criteria requirement such as

reserve margin, loss of load probability (LOLP), the loss of largest units, etc."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10243 - We direct public utilities, working through NERC, to develop clear requirements for allocating CBM over transmission paths and flowgates. While we do not mandate a particular methodology for allocating CBM to paths and flowgates, one approa

Para 260

"We direct public utilities, working through NERC, to develop clear requirements for allocating CBM over transmission paths and flowgates. While we do not mandate a particular methodology for allocating CBM to paths and flowgates, one approach could be based on the location of the outside resources or spot market hubs that an LSE has historically relied on during emergencies resulting from an energy deficiency."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10244 - We concur with TAPS proposal that all LSEs should have access to CBM and meaningful input into how much transfer capability is set aside as CBM. In the transparency section below, we provide detailed requirements regarding availability of d

Para 261

"We concur with TAPS proposal that all LSEs should have access to CBM and meaningful input into how much transfer capability is set aside as CBM. In the transparency section below, we provide detailed requirements regarding availability of documentation used to determine the amount of transfer capability to be set aside as CBM and the posting of CBM values and narratives. Access to this documentation will enable LSEs to validate how much transfer capability is set aside as CBM on each system and provide them with information to question whether the set-aside is consistent with the reliability standards and this Final Rule."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10245 - Concerning TAPS proposal to remove the reservation decision from the sole discretion of transmission providers, we determine that LSEs should be permitted to call for use of CBM, if they do so pursuant to conditions established in the relia

Para 262

"Concerning TAPS proposal to remove the reservation decision from the sole discretion of transmission providers, we determine that LSEs should be permitted to call for use of CBM, if they do so pursuant to conditions established in the reliability standards development process. We direct public utilities working through NERC to modify the CBM-related standards to specify the generation deficiency conditions during

which an LSE will be allowed to use the transfer capability reserved as CBM. In addition, we direct that transmission set aside as CBM shall be zero in non-firm ATC calculations. Finally, we order public utilities to work with NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10264 - The Commission adopts the NOPR proposal and requires public utilities, working through NERC, to complete the ongoing process of modifying TRM standards MOD-008 and MOD-009. We understand that the standard drafting process is underway as a j

Para 272

"The Commission adopts the NOPR proposal and requires public utilities, working through NERC, to complete the ongoing process of modifying TRM standards MOD-008 and MOD-009. We understand that the standard drafting process is underway as a joint project with NAESB."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10246 - The Commission also adopts the NOPR proposal to establish standards specifying the appropriate uses of TRM to guide NERC and NAESB in the drafting process. Transmission providers may set aside TRM for (1) load forecast and load distribution

Para 273

"The Commission also adopts the NOPR proposal to establish standards specifying the appropriate uses of TRM to guide NERC and NAESB in the drafting process. Transmission providers may set aside TRM for (1) load forecast and load distribution error, (2) variations in facility loadings, (3) uncertainty in transmission system topology,

(4) loop flow impact, (5) variations in generation dispatch, (6) automatic sharing of reserves, and (7) other uncertainties as identified through the NERC reliability standards development process. Because load, facility loading and other uncertainties constantly deviate, we will not require that TRM set aside capacity be set at zero in the non-firm ATC calculation. In other words, we will not require transfer capability that is set aside

as TRM to be sold on a non-firm basis. We find that clear specification in this Final Rule of the permitted purposes for which entities may reserve CBM and TRM will virtually eliminate double-counting of TRM and CBM."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10265 - In addition, we direct public utilities, working through NERC, to establish an appropriate maximum TRM. One acceptable method may be to use a percentage of ratings reduction, i.e., model the system assuming all facility ratings are reduced

Para 275

"In addition, we direct public utilities, working through NERC, to establish an appropriate maximum TRM. One acceptable method may be to use a percentage of ratings reduction, i.e., model the system assuming all facility ratings are reduced by a specific percentage. This is a relatively simple method and, if adopted as the reliability standards method, should not restrict a transmission provider from using a more

sophisticated method that may allow for greater ATC without reducing overall reliability."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10272 - The Commission directs public utilities, working through NERC, to modify the reliability standards MOD-010 through MOD-025 to incorporate a requirement for the periodic review and modification of models for (1) load flow base cases with con

Para 290

"The Commission directs public utilities, working through NERC, to modify the reliability standards MOD-010 through MOD-025 to incorporate a requirement for the periodic review and modification of models for (1) load flow base cases with contingency, subsystem, and monitoring files, (2) short circuit data, and (3) transient and dynamic stability simulation data, in order to ensure that they are up to date. This means that the models should be updated and benchmarked to actual events. We find that this requirement is essential in order to have an accurate simulation of the performance of the grid and from which to comparably calculate ATC, therefore increasing transparency and decreasing the potential for undue discrimination by transmission providers."

Not assigned to any project.

DIRECTIVE: S- Ref 10194 - The Commission also adopts the NOPR proposal to require transmission providers to use data and modeling assumptions for the short- and long-term ATC calculations that are consistent with that used for the planning of operations and system e

Para 292

"The Commission also adopts the NOPR proposal to require transmission providers to use data and modeling assumptions for the short- and long-term ATC calculations that are consistent with that used for the planning of operations and system expansion, respectively, to the maximum extent practicable. This includes, for example: (1) load

levels, (2) generation dispatch, (3) transmission and generation facilities maintenance schedules, (4) contingency outages, (5) topology, (6) transmission reservations, (7) assumptions regarding transmission and generation facilities additions and retirements, and (8) counterflows. We find that requiring consistency in the data and modeling assumptions used for ATC calculations will

remedy the potential for undue discrimination by eliminating discretion and ensuring comparability in the manner in

which a transmission provider operates and plans its system to serve native load and the manner in which it calculates ATC for service to third parties. The Commission directs public utilities, working through NERC, to modify ATC standards to achieve this consistency."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10195 - With regard to EPSAs request for the standardization of additional data inputs, we believe they are already captured in the Commissions proposal as adopted in this Final Rule. Xcel asks the Commission to require consistency in the determina

Para 293

"With regard to EPSAs request for the standardization of additional data inputs, we believe they are already captured in the Commissions proposal as adopted in this Final Rule. Xcel asks the Commission to require consistency in the determination of counterflows in the calculation of ATC. Counterflows are included in the list of assumptions that public utilities, working through NERC, are required to make consistent. We believe that counterflows, if treated inconsistently, can adversely affect

reliability and competition, depending on how they are accounted for. Accordingly, we reiterate that public utilities, working through NERC and NAESB, are directed to develop an approach for accounting for counterflows, in the relevant ATC standards and business practices. We find unnecessary Xcels request that we require a date certain for specific

issues in the Western Interconnection to be addressed. Above we require public utilities,working through NERC, to modify the ATC standards within 270 days after the publication of the Final Rule in the Federal Register."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10196 - Para 295. We offer the following clarifications. In response to Southern, we clarify that we require consistent use of assumptions underlying operational planning for short-term ATC and expansion planning for long-term ATC calculation. We a

Para 295

"295. We offer the following clarifications. In response to Southern, we clarify that we require consistent use of assumptions underlying operational planning for short-term ATC and expansion planning for long-term ATC calculation. We also clarify that there must be a consistent basis or approach to determining load levels. For example, one approach may be for transmission providers to calculate load levels using an on- and offpeak model for each month when evaluating yearly service requests and calculating yearly ATC. The same (peak- and off-peak) or alternative approaches may be used for monthly, weekly, daily and hourly ATC calculations. Regardless of the ultimate choice of approach, it is imperative that all transmission providers use the same approach to

modeling load levels to enable the meaningful exchange of data among transmission providers. Accordingly, we direct public utilities, working through NERC, to develop consistent requirements for modeling load levels in MOD-001 for the services offered under the pro forma OATT."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10197 - Para 296. With respect to modeling of generation dispatch, we direct public utilities, working through NERC, to develop requirements in NERCs MOD-001 reliability standard specifying how transmission providers shall determine which generator

Para 296

"296. With respect to modeling of generation dispatch, we direct public utilities, working through NERC, to develop requirements in NERCs MOD-001 reliability standard specifying how transmission providers shall determine which generators should be modeled in service, including guidance on how independent generation should be considered. We agree with Ameren that any modeling of base generation dispatch must

model generators, including merchant generators, as they are expected to run. Accordingly, we direct public utilities, working through NERC, to revise reliability standard MOD-001 by specifying that base generation dispatch will model (1) all designated network resources and other resources that are committed or have the legal obligation to run, as they are expected to run and (2) uncommitted resources that are deliverable within the control area, economically dispatched as necessary to meet

balancing requirements."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10198 - Regarding transmission reservations modeling, we direct public utilities, working through NERC, to develop requirements in reliability standard MOD-001 that specify (1) a consistent approach on how to simulate reservations from points of re

Para 297

"Regarding transmission reservations modeling, we direct public utilities, working through NERC, to develop requirements in reliability standard MOD-001 that specify (1) a consistent approach on how to simulate reservations from points of receipt to points of delivery when sources and sinks are unknown and (2) how to model existing

reservations."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10199 - The Commission adopts the NOPR proposal and requires the development of reliability standards that ensure ATC is calculated at consistent intervals among transmission providers. The Commission thus directs public utilities, working through

Para 301

"The Commission adopts the NOPR proposal and requires the development of reliability standards that ensure ATC is calculated at consistent intervals among transmission providers. The Commission thus directs public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner

that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. This process must also consider whether ATC should be calculated more frequently for constrained facilities. ATC-related requirements for OASIS posting are discussed below."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10200 - The Commission adopts the NOPR proposal and directs public utilities, working through NERC, to revise the related MOD reliability standards to require the exchange of data and coordination among transmission providers and, working through N

Para 310

"The Commission adopts the NOPR proposal and directs public utilities, working through NERC, to revise the related MOD reliability standards to require the exchange of data and coordination among transmission providers and, working through NAESB, to develop complementary business practices. The following data shall, at a minimum, be exchanged among transmission providers for the purposes of ATC modeling: (1) load levels; (2) transmission planned and contingency outages; (3) generation planned and contingency outages; (4) base generation dispatch; (5) existing transmission reservations, including counterflows; (6) ATC recalculation frequency and times; and (7) source/sink modeling identification. The Commission concludes that the exchange of such data is necessary to support the reforms requiring consistency in the determination of ATC adopted in this Final Rule. As explained above, transmission providers are required to coordinate the calculation of TTC/TFC and ATC/AFC with others and this requires a standard means of exchanging data."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10201 - Para 338 .... we require that the information in Attachment C be sufficient to demonstrate that a transmission provider is not double counting CBM in its ATC calculation.

Para 338

"338.We adopt EEIs proposal that the Commission revise Attachment C, section 3(f) to replace the word prove with the word demonstrate. The word demonstrate more accurately describes the showing we expect the transmission provider to make. We agree that the word prove implies a standard of proof that we did not intend to impose. We also acknowledge TVAs comments that the NERC standards drafting team is developing standards that should address double counting in ATC calculations in general. However, we require that the information in Attachment C be sufficient to demonstrate that a transmission provider is not double counting CBM in its ATC calculation."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10247 - Para 354. The Commission adopts the CBM posting requirements proposed in the NOPR. In doing so, we amend our OASIS regulations to incorporate the directives established in the CBM Order. Accordingly, we require transmission providers to p

Para 354

"354.The Commission adopts the CBM posting requirements proposed in the NOPR. In doing so, we amend our OASIS regulations to incorporate the directives established in the CBM Order. Accordingly, we require transmission providers to post (and update) the CBM amount for each path. In addition, the Commission requires transmission providers to make any transfer capability set aside for CBM but unused for such purpose available on a non-firm basis and to post this availability on OASIS. Furthermore, the Commission requires transmission providers to post (and update) the TRM values for the paths on which the transmission provider already posts ATC, TTC, and CBM."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10248 - The Commission incorporates into its regulations the requirement in the CBM Order for a transmission provider to periodically reevaluate its transfer capability setaside for CBM. With respect to TAPS concerns over the effort involved in the

Para 358

"The Commission incorporates into its regulations the requirement in the CBM Order for a transmission provider to periodically reevaluate its transfer capability setaside for CBM. With

respect to TAPS concerns over the effort involved in the reevaluation process, we will require CBM studies to be performed at least every year. This requirement is consistent with the CBM Order, in which the Commission stated that the level of ATC set aside for CBM should be reevaluated periodically to take into

account more certain information (such as assumptions that may not have, in fact, materialized.)"

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10202 - We affirm our statement in the NOPR proposal acknowledging that transfer capability associated with transmission reservations that are not scheduled in real time is required to be made available as non-firm, and posted on OASIS.

Para 389

"We affirm our statement in the NOPR proposal acknowledging that transfer capability associated with transmission reservations that are not scheduled in real time is required to be made available as non-firm, and posted on OASIS."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

FERC - Mandatory Reliability Standards for the Bulk-Power System (Order 693)

Issued 3/16/2007

DIRECTIVE: S- Ref 10164 - Provide a framework for ATC, TTC, and ETC calculation, developing industry-wide consistency of all ATC components. Three methodologies are expected: contract path ATC, network ATC, and network AFC.

Para 1029

"Provide a framework for ATC, TTC, and ETC calculation, developing industry-wide consistency of all ATC components. Three methodologies are expected: contract path ATC, network ATC, and network AFC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10176 - there is neither a definition of AFC/TFC (Total Flowgate Capability) in the EROs glossary nor an existing Reliability Standard that discusses AFC. Consistent with our approach to achieving consistency and transparency, we direct the ERO to

Para 1031

"there is neither a definition of AFC/TFC (Total Flowgate Capability) in the EROs glossary nor an existing Reliability Standard that discusses AFC. Consistent with our approach to achieving consistency and transparency, we direct the ERO to develop AFC/TFC definitions and requirements used to identify a particular set of transmission facilities as flowgates."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10172 - Provides for the conversion of AFC to ATC.

Para 1031

"Provides for the conversion of AFC to ATC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10177 - The Commission directs the ERO to develop a consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses. We expect that the ERO will address ETC t

Para 1032

"The Commission directs the ERO to develop a consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses. We expect that the ERO will address ETC through the MOD-001-0 Reliability Standard rather than through a separate Reliability Standard.

we determine that ETC should be defined to include committed uses of the transmission system, including: (1) native load commitments (including network service); (2) grandfathered transmission rights; (3) firm and non-firm point-to-point reservations; (4) rollover rights associated with long-term firm service and (5) other uses identified through the ERO process. ETC should not be used to set aside transfer capability for any type of planning or contingency reserve; these are to be addressed through CBM and TRM. In addition, in the short-term ATC calculation, all reserved but unused transfer capability (non-scheduled) must be released as non-firm ATC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10178 - we find that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved tr

Para 1033

"we find that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generators nameplate capacity at a POR. This will prevent unrealistic use of transmission capacity associated with power output from a generator identified as a POR. One approach that could be used is examining historical patterns of actual reservation use during a particular season, month, or time of day."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10179 - identifies to whom MOD-001-0 Reliability Standards apply, i.e., users, owners and operators of the Bulk-Power System.

Para 1034

"identifies to whom MOD-001-0 Reliability Standards apply, i.e., users, owners and operators of the Bulk-Power System."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10168 - direct the ERO to modify Reliability Standard MOD-001-0 to require disclosure of the algorithms and processes used in ATC calculation. In addition, consistent with Order No. 890, the Commission believes that further clarification is necess

Para 1036

"direct the ERO to modify Reliability Standard MOD-001-0 to require disclosure of the algorithms and processes used in ATC calculation. In addition, consistent with Order No. 890, the Commission believes that further clarification is necessary regarding the ATC calculation algorithm for firm and non-firm ATC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10181 - we direct the ERO to modify Reliability Standard MOD-001-0 to require disclosure of the algorithms and processes used in ATC calculation, and also to implement the following principles for firm and non-firm ATC calculations: (1) for firm A

Para 1036

"we direct the ERO to modify Reliability Standard MOD-001-0 to require disclosure of the algorithms and processes used in ATC calculation, and also to implement the following principles for firm and non-firm ATC calculations: (1) for firm ATC calculations, the transmission provider shall account only for firm commitments and (2) for non-firm ATC calculations, the transmission provider shall account for both firm and non-firm commitments, postbacks of redirected service, unscheduled service and counterflows."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10169 - Identify a detailed list of information to be exchanged among transmission providers for the purposes of ATC modeling.

Para 1038

"Identify a detailed list of information to be exchanged among transmission providers for the purposes of ATC modeling."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10170 - Include a requirement that assumptions used in the ATC and AFC calculations should be consistent with those used for planning the expansion of or operation of the bulk power system.

Para 1039

"Include a requirement that assumptions used in the ATC and AFC calculations should be consistent with those used for planning the expansion of or operation of the bulk power system."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10182 - Accordingly, we direct the ERO to develop consistent requirements for modeling load levels in MOD-001-0

Para 1040

"Accordingly, we direct the ERO to develop consistent requirements for modeling load levels in MOD-001-0"

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10183 - With respect to modeling of generation dispatch, we direct the ERO to develop requirements in MOD-001-0 specifying how transmission providers should determine which generators should be modeled in service, including guidance on how indepen

Para 1041

"With respect to modeling of generation dispatch, we direct the ERO to develop requirements in MOD-001-0 specifying how transmission providers should determine which generators should be modeled in service, including guidance on how independent generation should be considered. Accordingly, we direct the ERO to revise Reliability Standard MOD-001-0 by specifying that base generation dispatch will model: (1) all designated network resources and other resources that are committed to or have the legal obligation to run, as they are expected to run and (2) all uncommitted resources that are deliverable within the control area, economically dispatched as necessary to meet balancing requirements."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10171 - Require ATC to be updated on a consistent time interval.

Para 1042

"Require ATC to be updated on a consistent time interval."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10184 - Regarding transmission reservations modeling, we direct the ERO to develop requirements in Reliability Standard MOD-001-0 that specify: (1) a consistent approach on how to simulate reservations from points of receipt to points of delivery w

Para 1042

"Regarding transmission reservations modeling, we direct the ERO to develop requirements in Reliability Standard MOD-001-0 that specify: (1) a consistent approach on how to simulate reservations from points of receipt to points of delivery when sources and sinks are unknown and (2) how to model existing reservations."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10185 - the Commission directs the ERO to modify Reliability Standard MOD-001-0 to require ATC to be updated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g.,

Para 1043

"the Commission directs the ERO to modify Reliability Standard MOD-001-0 to require ATC to be updated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecasts, interchange schedules, transmission reservations, facility ratings and other necessary data. This process must also consider whether ATC should be calculated more frequently for constrained facilities."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10173 - Applicable entities must make available their assumptions and contingencies underlying ATC and TTC calculations.

Para 1046

"Applicable entities must make available their assumptions and contingencies underlying ATC and TTC calculations."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10186 - direct the ERO to develop in MOD-001-0 a requirement that each transmission service provider provide on OASIS its OATT Attachment C, in which Order No. 890 requires transmission providers to include a detailed description of the specific ma

Para 1047

"direct the ERO to develop in MOD-001-0 a requirement that each transmission service provider provide on OASIS its OATT Attachment C, in which Order No. 890 requires transmission providers to include a detailed description of the specific mathematical algorithm the transmission provider uses to calculate both firm and non-firm ATC for various time frames such as: (1) the scheduling horizon (same day and real-time), (2) operating horizon (day ahead and pre-schedule) and (3) planning horizon (beyond the operating horizon). In addition, a transmission provider must include a process flow diagram that describes the various steps that it takes in performing the ATC calculation."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10130 - Para 1051. The Commission directs the ERO, through the Reliability Standards development process, to modify FAC-012-1 and any other appropriate Reliability Standards to assure consistency in the determination of TTC/TFC for services provide

Para 1051

"1051.The Commission directs the ERO, through the Reliability Standards development process, to modify FAC-012-1 and any other appropriate Reliability Standards to assure consistency in the determination of TTC/TFC for services provided under the pro forma OATT, and requires that those processes be the same as those used in operation and planning for native load and reliability assessment studies. Changes to the process of calculating TTC are appropriate if implementation is coordinated with revisions to the other applicable operating or planning standards. We acknowledge that reliability regions have historically calculated transfer capability using different approaches, and we agree that regional differences should be respected. However, as already discussed above regarding ATC, TTC requirements will be determined in the ERO Reliability Standards development process, and any request for a regional difference from the Reliability Standards must take place through the ERO process."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10129 - Para 1051. The Commission directs the ERO, through the Reliability Standards development process, to modify FAC-012-1 and any other appropriate Reliability Standards to assure consistency in the determination of TTC/TFC for services provide

Para 1051

"1051.The Commission directs the ERO, through the Reliability Standards development process, to modify FAC-012-1 and any other appropriate Reliability Standards to assure consistency in the determination of TTC/TFC for services provided under the pro forma OATT, and requires that those processes be the same as those used in operation and planning for native load and reliability assessment studies. Changes to the process of calculating TTC are appropriate if implementation is coordinated with revisions to the other applicable operating or planning standards. We acknowledge that reliability regions have historically calculated transfer capability using different approaches, and we agree that regional differences should be respected. However, as already discussed above regarding ATC, TTC requirements will be determined in the ERO Reliability Standards development process, and any request for a regional difference from the Reliability Standards must take place through the ERO process."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10175 - Identify applicable entities in terms of users, owners, and operators of the bulk power system.

Para 1056

"Identify applicable entities in terms of users, owners, and operators of the bulk power system."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10174 - Focus of ATC/AFC with this standard; FAC-012-1 should focus on TTC/TFC.

Para 1057

"Focus of ATC/AFC with this standard; FAC-012-1 should focus on TTC/TFC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10230 - Consider APPAs suggestion that MOD-003 may be redundant and should be eliminated through the standards development process if certain reporting requirements are included in MOD-001.

Para 1066

"Consider APPAs suggestion that MOD-003 may be redundant and should be eliminated through the standards development process if certain reporting requirements are included in MOD-001."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10231 - Clarify that CBM shall be set aside upon request of any LSE within a balancing area to meet its verifiable historical, state, RTO, or regional generation reliability criteria.

Para 1077

"Clarify that CBM shall be set aside upon request of any LSE within a balancing area to meet its verifiable historical, state, RTO, or regional generation reliability criteria."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10240 - Para 1077 ... We expect verification of the CBM values to be part of the Requirements with appropriate Measures and Levels of Non-Compliance.

Para 1077

"1077.We agree with FirstEnergy that CBM is important for system reliability by allowing the LSEs to meet their historical, state, RTO or regional generation reliability criteria requirement such as reserve margin, loss of load probability, loss of largest units, etc. We agree with EEI and MidAmerican that transparency of the studies supporting CBM determination will reduce the opportunity for transmission service providers to overestimate the amount of CBM and misuse transfer capability. We therefore direct the ERO to develop Requirements regarding transparency of the generation planning studies used to determine CBM values. We also clarify that CBM should only be set aside upon request of any LSE within a balancing area to meet its verifiable historical, state, RTO or regional generation reliability criteria requirement such as reserve margin, loss of load probability, loss of largest units, etc. We expect verification of the CBM values to be part of the Requirements with appropriate Measures and Levels of Non-Compliance."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10232 - Develop requirements regarding transparency of the generation planning studies used to determine CBM values.

Para 1077

"Develop requirements regarding transparency of the generation planning studies used to determine CBM values."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10238 - We continue to believe this Reliability Standard should be modified to include a provision ensuring that CBM, TRM and ETC cannot be used for the same purpose, such as loss of the identical generating unit. In order to limit misuse of trans

Para 1078

"We continue to believe this Reliability Standard should be modified to include a provision ensuring that CBM, TRM and ETC cannot be used for the same purpose, such as loss of the identical generating unit. In order to limit misuse of transfer capability set aside as CBM, we direct the ERO to provide more specific requirements for how CBM should be determined and allocated across transmission paths or flowgates."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10235 - Ensure that CBM, TRM, and ETC cannot be used for the same purpose, e.g. loss of the identical generating unit.

Para 1079

"Ensure that CBM, TRM, and ETC cannot be used for the same purpose, e.g. loss of the identical generating unit."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10234 - Add LSE as an applicable entity.

Para 1080

"Add LSE as an applicable entity."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10236 - Coordinate with NAESB business practices.

Para 1081

"Coordinate with NAESB business practices."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10233 - Make clear the process for how CBM is allocated across transmission paths or flowgates.

Para 1082

"Make clear the process for how CBM is allocated across transmission paths or flowgates."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10237 - Consider APPAs suggestion that MOD-004 may be redundant and could be eliminated is MOD-002 is modified to include reporting requirements.

Para 1083

"Consider APPAs suggestion that MOD-004 may be redundant and could be eliminated is MOD-002 is modified to include reporting requirements."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10250 - Consider APPAs comment to incorporate MOD-004 and MOD-005 into MOD-006 through the standards development process.

Para 1088

"Consider APPAs comment to incorporate MOD-004 and MOD-005 into MOD-006 through the standards development process."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10251 - Include a requirement that CBM and TRM will not be used for the same purpose.

Para 1098

"Include a requirement that CBM and TRM will not be used for the same purpose."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10252 - CBM should be used for emergency generation deficiencies.

Para 1099

"CBM should be used for emergency generation deficiencies."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10253 - Modify requirement R1.2 to define generation deficiency based on a specific energy emergency alert level.

Para 1100

"Modify requirement R1.2 to define generation deficiency based on a specific energy emergency alert level."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10254 - CBM should be zero in the calculation of non-firm ATC.

Para 1101

"CBM should be zero in the calculation of non-firm ATC."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10256 - We direct that CBM may be implemented up to the reserved value when a LSE is facing firm load curtailments.

Para 1101

"We direct that CBM may be implemented up to the reserved value when a LSE is facing firm load curtailments."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10257 - We adopt the NOPR proposal that CBM should be used only when the LSEs local generation capacity is insufficient to meet balancing Reliability Standards, with the clarification that the local generation is that generation capacity that is ei

Para 1102

"We adopt the NOPR proposal that CBM should be used only when the LSEs local generation capacity is insufficient to meet balancing Reliability Standards, with the clarification that the local generation is that generation capacity that is either owned or contracted for by the LSE."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10255 - Expand applicability section to include entities that use CBM, such as LSEs.

Para 1103

"Expand applicability section to include entities that use CBM, such as LSEs."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10258 - Expand applicability section to include entities that use CBM, such as LSEs.

Para 1110

"Expand applicability section to include entities that use CBM, such as LSEs."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10259 - Expand applicability section to include balancing authorities as well.

Para 1110

"Expand applicability section to include balancing authorities as well."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10260 - Include clear requirements for how TRM should be calculated, including a methodology for determining maximum TRM values, and allocated across paths.

Para 1122

"Include clear requirements for how TRM should be calculated, including a methodology for determining maximum TRM values, and allocated across paths."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10261 - Clear requirements for permitted purposes for which TRM can be set aside and used.

Para 1122
"Clear requirements for permitted purposes for which TRM can be set aside and used."
Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10262 - Clear requirements for availability of documentation that supports TRM determination.

Para 1123
"Clear requirements for availability of documentation that supports TRM determination."
Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10263 - Expand the applicability to include planning authorities and reliability coordinators.

Para 1124
"Expand the applicability to include planning authorities and reliability coordinators."
Assigned: Project 2006-07 - ATC-TTC-CBM-TRM
Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10266 - Require users, owners, and operators to submit data to the regional entities as needed for modeling studies and assessments.

Para 1147
"Require users, owners, and operators to submit data to the regional entities as needed for modeling studies and assessments."
Not assigned to any project.

DIRECTIVE: S- Ref 10267 - Require transmission planners to provide the contingency lists they use in performing system operation and planning studies.

Para 1148
"Require transmission planners to provide the contingency lists they use in performing system operation and planning studies."
Not assigned to any project.

DIRECTIVE: S- Ref 10268 - Address critical energy infrastructure confidentiality issues as part of the standard development process.

Para 1152
"Address critical energy infrastructure confidentiality issues as part of the standard development process."
Assigned: Project 2009-04 - Phasor Measurement Units
Status: In Drafting

DIRECTIVE: S- Ref 10269 - Expand the applicability to include transmission operators

Para 1154
"Expand the applicability to include transmission operators"
Assigned: Project 2009-04 - Phasor Measurement Units
Status: In Drafting

DIRECTIVE: S- Ref 10271 - We adopt our NOPR proposal that the planning authority should be included in this Reliability Standard because the planning authority is the entity responsible for the coordination and integration of transmission facilities and resource pla

Para 1155

"We adopt our NOPR proposal that the planning authority should be included in this Reliability Standard because the planning authority is the entity responsible for the coordination and integration of transmission facilities and resource plans, as well as one of the entities responsible for the integrity and consistency of the data"

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10273 - Expand the applicability to include the planning authority.

Para 1162

"Expand the applicability to include the planning authority."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10274 - Develop a work plan and submit a compliance filing that will facilitate the ongoing collection of the steady-state modeling and simulation data specified in this standard.

Para 1163

"Develop a work plan and submit a compliance filing that will facilitate the ongoing collection of the steady-state modeling and simulation data specified in this standard."

Not assigned to any project.

DIRECTIVE: S- Ref 10279 - As we will discuss in the next section on MOD-013-1, we require the ERO to develop a Work Plan and submit a compliance filing that will facilitate ongoing collection of the dynamics system modeling and simulation data specified by the defer

Para 1177

"As we will discuss in the next section on MOD-013-1, we require the ERO to develop a Work Plan and submit a compliance filing that will facilitate ongoing collection of the dynamics system modeling and simulation data specified by the deferred MOD-013-1 Reliability Standard, which is necessary for implementation of MOD-012-0."

Not assigned to any project.

DIRECTIVE: S- Ref 10275 - Require users, owners, and operators to submit data to the regional entities as needed for modeling studies and assessments.

Para 1177

"Require users, owners, and operators to submit data to the regional entities as needed for modeling studies and assessments."

Not assigned to any project.

DIRECTIVE: S- Ref 10276 - Provide a list of faults and disturbances used in performing dynamics system studies for operation and planning.

Para 1178

"Provide a list of faults and disturbances used in performing dynamics system studies for operation and planning."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10277 - Address critical energy infrastructure confidentiality issues as part of the standard development process.

Para 1181

"Address critical energy infrastructure confidentiality issues as part of the standard development process."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10278 - Para 1183 We agree with APPA that the functional entity responsible for providing the fault and disturbance list should be the transmission planner, instead of the transmission owner, as proposed in the NOPR. We also agree with APPA that

Para 1184

"Expand the applicability to include transmission operators, planning authorities, and transmission planners."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10284 - Para 1184 .... We therefore direct the ERO to add the planning authority to the list of applicable entities.

Para 1184

"1184.We adopt our NOPR proposal that planning authorities should be included in this Reliability Standard because the planning authority is the entity responsible for the coordination and integration of transmission facilities and resource plans, as well as one of the entities responsible for the integrity and consistency of the data. We therefore direct the ERO to add the planning authority to the list of applicable entities."

Assigned: Project 2009-04 - Phasor Measurement Units

DIRECTIVE: S- Ref 10280 - Permit entities to estimate dynamics stat if they are unable to obtain unit specific information.

Para 1197

"Permit entities to estimate dynamics stat if they are unable to obtain unit specific information."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10281 - Require verification of the dynamic models with actual disturbance data.

Para 1197

"Require verification of the dynamic models with actual disturbance data."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10282 -Expand the applicability to include planning authorities, transmission operators, and transmission planners

Para 1199

"Expand the applicability to include planning authorities"

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10283 - Develop a work plan and submit a compliance filing that will facilitate the ongoing collection of the dynamics modeling and simulation data specified in this standard.

Para 1200

"Develop a work plan and submit a compliance filing that will facilitate the ongoing collection of the dynamics modeling and simulation data specified in this standard."

Not assigned to any project.

DIRECTIVE: S- Ref 10286 - Require models to be validated against actual system response.

Para 1210

"Require models to be validated against actual system response."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10287 - If model output is not within the accuracy required, the model shall be modified to achieve the necessary accuracy.

Para 1211

"If model output is not within the accuracy required, the model shall be modified to achieve the necessary accuracy."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10288 - Require users, owners, and operators to provide the validated models to regional reliability organizations.

Para 1212

"Require users, owners, and operators to provide the validated models to regional reliability organizations."

Not assigned to any project.

DIRECTIVE: S- Ref 10289 - Develop a work plan that will facilitate ongoing validation of steady-state models and submit a compliance filing to the Commission.

Para 1212

"Develop a work plan that will facilitate ongoing validation of steady-state models and submit a compliance filing to the Commission."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10290 - Require actual system events be simulated and dynamics system model output be validated against actual system response.

Para 1220

"Require actual system events be simulated and dynamics system model output be validated against actual system response."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10291 - Require users, owners, and operators to provide the validated models to regional entity.

Para 1221

"Require users, owners, and operators to provide the validated models to regional entity."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10292 - Develop a work plan that will facilitate ongoing validation of dynamics models and submit a compliance filing to the Commission.

Para 1221

"Develop a work plan that will facilitate ongoing validation of dynamics models and submit a compliance filing to the Commission."

Not assigned to any project.

DIRECTIVE: S- Ref 10293 - Modify the definition of DSM to include any other entities that undertake activities or programs to influence the amount or timing of electricity they use without violating other reliability standards requirements. Paragraph 1232. Supporte

Para 1232

"Modify the definition of DSM to include any other entities that undertake activities or programs to influence the amount or timing of electricity they use without violating other reliability standards requirements. Paragraph 1232. Supported by many commenters, the Commission directs the ERO to modify MOD-016-1 and expand the applicability section to include the transmission planner, on the basis that under the NERC Functional Model the transmission planner is responsible for collecting system modeling data, including actual and forecast load, to evaluate transmission expansion plans. We disagree with EEI that this Reliability Standard should not be applied to the transmission planner because load-related data for controllable DSM is not only needed for distribution and transmission operations, but is also necessary for the transmission planner to take controllable DSM into account in planning the transmission system. Requirement R1.1 relates to data submittal, and requires data to be consistent with that supplied for the TPL-005 and TPL-006 standards, which clearly apply to transmission planners. We approve the EROs definition in the glossary of DSM as all activities or programs undertaken by a Load-Serving Entity or its customers to influence the amount or timing of electricity they use. Only activities or programs that meet the ERO definition, with the modification directed below, may be treated as DSM for purposes of the Reliability Standards. Recognizing the potential role that industrial customers who do not take service through an LSE and load aggregators, for example, may play in meeting the Reliability Standards, we direct the ERO to modify the definition of DSM. Specifically, we direct the ERO to add to its definition of DSM any other entities that undertake activities or programs to influence the amount or timing of electricity they use without violating other Reliability Standard Requirement."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10294 - Expand the applicability to include transmission planners. Paragraph 1224. In the NOPR, the Commission proposed to approve Reliability Standard MOD-016-1 as mandatory and enforceable. In addition, the Commission proposed to direct NERC to

Para 1232

"Expand the applicability to include transmission planners. Paragraph 1224. In the NOPR, the Commission proposed to approve Reliability Standard MOD-016-1 as mandatory and enforceable. In addition, the Commission proposed to direct NERC to submit a modification to MOD-016-1 that expands the applicability section to include the transmission planner."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10299 - we direct the ERO to provide a Work Plan and compliance filing regarding the collection of information specified under standards that are deferred, and believe there should be no difficulty complying with this Reliability Standard.

Para 1247

"we direct the ERO to provide a Work Plan and compliance filing regarding the collection of information specified under standards that are deferred, and believe there should be no difficulty complying with this Reliability Standard."

Not assigned to any project.

DIRECTIVE: S- Ref 10295 - Include requirements for reporting of temperature and humidity along with the peak loads. Paragraph 1249. The Commission also directs the ERO to modify the Reliability Standad to require reporting of temperature and humidity along with pea

Para 1249

"Include requirements for reporting of temperature and humidity along with the peak loads. Paragraph 1249. The Commission also directs the ERO to modify the Reliability Standad to require reporting of temperature and humidity along with peak load because actual load must be weather normalized for meaningful comparison with forecasted values.361 In response to MidAmericans observation that it sees little value in collecting this data, we believe that collecting it will allow all load data to be weather-normalized, which will provide greater confidence when comparing data accuracy, which ultimately will enhance reliability. As a result, we reject Xcels proposal that the standard be revised to include only the generic term peak producing weather conditions because it is too generic for a mandatory Reliability Standard."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10300 - We agree, however, with APPA that certain types of load are not sensitive to temperature and humidity. We therefore find that the ERO should address Alcoas concerns in its Reliability Standards development process.

Para 1250

"We agree, however, with APPA that certain types of load are not sensitive to temperature and humidity. We therefore find that the ERO should address Alcoas concerns in its Reliability Standards development process."

Assigned: Project 2009-05 - Resource Adequacy Assessments

DIRECTIVE: S- Ref 10296 - Reporting of accuracy, error and bias of load forecasts compared to actual loads taking temperature and humidity conditions into account. Paragraph 1251. The Commission adopts the NOPR proposal directing the ERO to modify the Reliability St

Para 1251

"Reporting of accuracy, error and bias of load forecasts compared to actual loads taking temperature and humidity conditions into account. Paragraph 1251. The Commission adopts the NOPR proposal directing the ERO to modify the Reliability Standard to require reporting of the accuracy, error and bias of load forecasts compared to actual loads with due regard to temperature and humidity variations. This requirement will measure the closeness of the load forecast to the actual value. We understand that load forecasting is a primary factor in achieving Reliable Operation. Underestimating load growth can result in insufficient or inadequate generation and transmission facilities, causing unreliability in real-time operations. Measuring the accuracy, error and bias of load forecasts is important information for system planners to include in their studies, and also improves load forecasts themselves."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10297 - Address methods to correct forecasts to minimize prior inaccuracies, errors, and bias. Paragraph 1252. The Commission agrees with APPA that accuracy, error and bias of load forecasts alone will not increase the reliability of load forecast

Para 1252

"Address methods to correct forecasts to minimize prior inaccuracies, errors, and bias. Paragraph 1252. The Commission agrees with APPA that accuracy, error and bias of load forecasts alone will not increase the reliability of load forecasts, and, as a result, will not affect system reliability. Understanding of the differences without action based on that understanding would not change anything. Therefore, we direct the ERO to add a
Requirement that addresses correcting forecasts based on prior inaccuracies, errors and bias."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10298 - Expand the applicability to include transmission planners. Paragraph 1257. The Commission approves Reliability Standard MOD-017-0 as mandatory and enforceable. In addition, the Commission directs the ERO to develop a modification to MOD-01

Para 1255

"Expand the applicability to include transmission planners. Paragraph 1257. The Commission approves Reliability Standard MOD-017-0 as mandatory and enforceable. In addition, the Commission directs the ERO to develop a modification to MOD-017-0 through the Reliability Standards development process that includes requirements for: (1) reporting of temperature and humidity along with the peak loads; (2) reporting of accuracy, error and bias of load forecasts compared to actual loads taking temperature and humidity variations into account; (3) addressing methods to correct forecasts to minimize prior inaccuracies, errors and bias and (4) including the transmission planner in the applicability section."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10302 - The Commission therefore directs the ERO to consider MISOs concerns in the Reliability Standards development process.

Para 1256

"The Commission therefore directs the ERO to consider MISOs concerns in the Reliability Standards development process."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10303 - Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred. Paragraph 1264. As an initial matter, we disagree that MOD-018-0 cannot be implemented because it is dependent on

Para 1264

"Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred. Paragraph 1264. As an initial matter, we disagree that MOD-018-0 cannot be implemented because it is dependent on various unapproved standards. As previously stated, we direct the ERO to provide a Work Plan and compliance filing regarding the collection of information specified for standards that are deferred, and believe there should be no difficulties complying with this Reliability Standard. We reiterate that ongoing collection of data is necessary to maintain system reliability, and approval of MOD-018-0 will help to achieve this goal."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10304 - Regarding TAPSs concern that small entities should not be required to comply with MOD-018-0 because their forecasts are not significant for system reliability purposes, the Commission directs the ERO to address this matter in the Reliabilit

Para 1265

"Regarding TAPSs concern that small entities should not be required to comply with MOD-018-0 because their forecasts are not significant for system reliability purposes, the Commission directs the ERO to address this matter in the Reliability Standards development process"

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10305 - Require users, owners, and operators to provide to the regional entity information related to forecasts of interruptible demands and direct control load management. Paragraph 1275. As an initial matter, we disagree that MOD-019-0 cannot be

Para 1275

"Require users, owners, and operators to provide to the regional entity information related to forecasts of interruptible demands and direct control load management. Paragraph 1275. As an initial matter, we disagree that MOD-019-0 cannot be implemented because it is dependent on MOD-016-0, which further depends on various unapproved standards. As previously stated, we direct the ERO to provide a Work Plan and compliance filing regarding the collection of information specified under related standards that are deferred, and believe there should be no difficulties complying with this Reliability Standard. We reiterate that ongoing collection of data is necessary to maintain system reliability, and approval of MOD-019-0 will help to achieve this goal. We therefore direct the ERO to use its authority pursuant to 39.2(d) of our regulations to require users, owners and operators to provide to the Regional Entity information related to forecasts of interruptible demands and direct control load management."

Not assigned to any project.

DIRECTIVE: S- Ref 10306 - Require reporting of the accuracy, error, bias of controllable load forecasts. Paragraph 1276. The Commission adopts the NOPR proposal directing the ERO to modify this standard to require reporting of the accuracy, error and bias of contro

Para 1276

"Require reporting of the accuracy, error, bias of controllable load forecasts. Paragraph 1276. The Commission adopts the NOPR proposal directing the ERO to modify this standard to require reporting of the accuracy, error and bias of controllable load forecasts. This requirement will enable planners to get a more reliable picture of the amount of controllable load that is actually available, therefore allowing planners to conduct more accurate system reliability assessments. The Commission finds that controllable load can be as reliable as other resources, and therefore should also be subject to the same reporting requirements. Although we recognize that verifying load control devices and interruptible loads may be complex, we do not believe that it is overly so. Further, we believe that the ERO, through its Reliability Standards development process can develop innovative solutions to the Commissions concern. We also note that EEI is concerned about such testing at times of peak load. We clarify that we are not requiring the testing to be conducted at peak load conditions. Consequently, we reject the proposals of EEI, FirstEnergy and International Transmission to discard the requirement for reporting of the accuracy, error and bias of controllable load forecasts."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10307 - Analyze differences between actual and forecasted demands for five years of actual controllable load and identify what corrective actions should be taken to approve controllable load forecasting for the 10-year planning horizon. Paragraph

Para 1277

"Analyze differences between actual and forecasted demands for five years of actual controllable load and identify what corrective actions should be taken to approve controllable load forecasting for the 10-year planning horizon. Paragraph 1277. We direct the ERO to include APPAs proposal in the Reliability Standards development process to add a new requirement to MOD-019-0 that would oblige resource planners to analyze differences between actual and forecasted demands for the five years of actual controllable load and identify what corrective actions should be taken to improve controllable load forecasting for the 10-year planning horizon."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10308 - Require reporting of the accuracy, error, and bias of controllable load forecasts. Paragraph 1289. The Commission approves Reliability Standard MOD-020-0 as mandatory and enforceable and directs the ERO to develop a modification to MOD-020

Para 1287

"Require reporting of the accuracy, error, and bias of controllable load forecasts. Paragraph 1289. The Commission approves Reliability Standard MOD-020-0 as mandatory and enforceable and directs the ERO to develop a modification to MOD-020-0 through the Reliability Standards development process to require reporting of the accuracy, error and bias of controllable load forecasts."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10313 - Therefore, we direct the ERO to use its authority pursuant to 39.2(d) of our regulations to require users, owners and operators to provide to the Regional Entity the information required by this Reliability Standard

Para 1297

"Therefore, we direct the ERO to use its authority pursuant to 39.2(d) of our regulations to require users, owners and operators to provide to the Regional Entity the information required by this Reliability Standard"

Not assigned to any project.

DIRECTIVE: S- Ref 10309 - Require users, owners, and operators to provide to the regional entity information related to this standard. Paragraph 1297. As an initial matter, we disagree that MOD-021-0 cannot be implemented because it is based on MOD-016-0, and throu

Para 1297

"Require users, owners, and operators to provide to the regional entity information related to this standard. Paragraph 1297. As an initial matter, we disagree that MOD-021-0 cannot be implemented because it is based on MOD-016-0, and through it on various unapproved standards, which creates an implementation problem. As previously stated, we direct the ERO to provide a Work Plan and compliance filing regarding collection of information specified under related standards that are deferred, and believe there should be no difficulty complying with this Reliability Standard. We reiterate that ongoing collection of data is necessary to maintain system reliability, and approval of MOD-21-0 will help to achieve this goal."

Not assigned to any project.

DIRECTIVE: S- Ref 10310 - Standardize principles on reporting and validation of DSM program information. Paragraph 1298. We agree with FirstEnergy and SMA that standardization of principles on reporting and validating DSM program information will provide consistent

Para 1298

"Standardize principles on reporting and validation of DSM program information. Paragraph 1298. We agree with FirstEnergy and SMA that standardization of principles on reporting and validating DSM program information will provide consistent and uniform evaluation of demand response to facilitate system operator confidence in relying on such resources, which will further increase accuracy of transmission system reliability assessment and consequently enhance overall reliability. We direct the ERO to modify this Reliability Standard to allow resource planners to analyze the causes of differences between actual and forecasted demands, and to identify any corrective actions that should be taken to improve forecasted demand responses for future forecasts. Therefore, we adopt the NOPR proposal and direct the ERO to modify MOD-021-0 by adding a requirement for standardization of principles on reporting and validating DSM program information."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10311 - Allow resource planners to analyze the causes of differences between actual and forecasted demands, and identify any corrective actions that should be taken to improve forecasted demand responses for future forecasts. Paragraph 1298. We ag

Para 1298

"Allow resource planners to analyze the causes of differences between actual and forecasted demands, and identify any corrective actions that should be taken to improve forecasted demand responses for future forecasts. Paragraph 1298. We agree with FirstEnergy and SMA that standardization of principles on reporting and validating DSM program information will provide consistent and uniform evaluation of demand response to facilitate system operator confidence in relying on such resources, which will further increase accuracy of transmission system reliability assessment and consequently enhance overall reliability. We direct the ERO to modify this Reliability Standard to allow resource planners to analyze the causes of differences between actual and forecasted demands, and to identify any corrective actions that should be taken to improve forecasted demand responses for future forecasts. Therefore, we adopt the NOPR proposal and direct the ERO to modify MOD-021-0 by adding a requirement for standardization of principles on reporting and validating DSM program information."

Assigned: Project 2009-05 - Resource Adequacy Assessments

Status: In Drafting

DIRECTIVE: S- Ref 10312 - Modify the title and purpose statement to remove the word controllable. Paragraph 1300. The Commission directs the ERO to modify the title and purpose statement to remove the word controllable. We note that no commenter disagrees.

Para 1300

"Modify the title and purpose statement to remove the word controllable. Paragraph 1300. The Commission directs the ERO to modify the title and purpose statement to remove the word controllable. We note that no commenter disagrees."

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10317 - Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred.

Para 1308

"Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10315 - Document test conditions and the relationships between test conditions and generator output so that the amount of power that can be expected to be delivered from a generator at different conditions can be determined.

Para 1310

"Document test conditions and the relationships between test conditions and generator output so that the amount of power that can be expected to be delivered from a generator at different conditions can be determined."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10318 - Similarly, we respond to Constellation that any modification of the Levels of Non-Compliance in this Reliability Standard should be reviewed in the ERO Reliability Standards development process.

Para 1310

"Similarly, we respond to Constellation that any modification of the Levels of Non-Compliance in this Reliability Standard should be reviewed in the ERO Reliability Standards development process."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10316 - Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net real power capability verification within 30 calendar days of approval. The confusion centers on approval and when the 3

Para 1311

"Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net real power capability verification within 30 calendar days of approval. The confusion centers on approval and when the 30-day period starts."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10314 - Require users, owners, and operators of the system to provide this information.

Para 1312

"Require users, owners, and operators of the system to provide this information."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10321 - Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred.

Para 1320

"Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10319 - Require verification of reactive power capability at multiple points over a units operating range.

Para 1321

"Require verification of reactive power capability at multiple points over a units operating range."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10320 Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net reactive power capability verification within 30 calendar days of approval. The confusion centers on approval and when the

Para 1322

"Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net reactive power capability verification within 30 calendar days of approval. The confusion centers on approval and when the 30-day period starts."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10322 - Identify the expectations of the training for each job function/position.

Para 1343

"Identify the expectations of the training for each job function/position."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10330 - Thus, in addition to modifying the Reliability Standard to identify generator operators as applicable entities, we direct the ERO to develop specific Requirements addressing the scope, content and duration appropriate for generator operator

Para 1363

"Thus, in addition to modifying the Reliability Standard to identify generator operators as applicable entities, we direct the ERO to develop specific Requirements addressing the scope, content and duration appropriate for generator operator personnel."

Assigned: Project 2010-01 - Support Personnel Training

Status: In Drafting

DIRECTIVE: S- Ref 10328 - Consider FirstEnergys comments regarding the nuclear plant operators training program as part of the standards development process.

Para 1364

"Consider FirstEnergys comments regarding the nuclear plant operators training program as part of the standards development process."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10323 - Expand the applicability section to include reliability coordinators, local transmission control center operating personnel, generator operators centrally-located at a generator control center with direct impact on the reliable operation of

Para 1372

"Expand the applicability section to include reliability coordinators, local transmission control center operating personnel, generator operators centrally-located at a generator control center with direct impact on the reliable operation of the bulk power system, and operations planning and operations support staff that carry out outage planning and assessments and those who develop SOLs, IROLs, or operating nomograms."

Assigned: Project 2006-01 - System Personnel Training

Status: Regulator Approved Delivery: 2010

DIRECTIVE: S- Ref 10327 - Consider whether personnel that support EMS applications should be included in the mandatory training requirements.

Due 8/23/2012

Para 1373

"Consider whether personnel that support EMS applications should be included in the mandatory training requirements."

Assigned: Project 2006-01 - System Personnel Training

Status: In Drafting

DIRECTIVE: S- Ref 10329 - Training programs for operations planning and operations support staff must be tailored to the needs of the function, the tasks performed and personnel involved.

Para 1375

"Training programs for operations planning and operations support staff must be tailored to the needs of the function, the tasks performed and personnel involved."

Assigned: Project 2006-01 - System Personnel Training

Status: In Drafting

DIRECTIVE: S- Ref 10326 - Determine the feasibility of developing meaningful performance metrics associated with the effectiveness of the training programs.

Para 1379

"Determine the feasibility of developing meaningful performance metrics associated with the effectiveness of the training programs."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10324 - Use the systematic approach to training methodology in the development of new training programs.

Para 1382

"Use the systematic approach to training methodology in the development of new training programs."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10331 - Para 1391 This does not mean that these entities must develop and maintain full-scale simulators but rather they should have access to training on simulators. Further, because the cost is likely to outweigh the reliability benefits for sm

Para 1391

"Include the use of simulators by reliability coordinators, transmission operators, and balancing authorities that have operational control over a significant portion of load and generation."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10332 - The Commission notes that no commenters specifically addressed the proposed modifications directing the ERO to expand the Applicability section to include reliability coordinators, and to identify the expectations of the training for each j

Para 1392

"The Commission notes that no commenters specifically addressed the proposed modifications directing the ERO to expand the Applicability section to include reliability coordinators, and to identify the expectations of the training for each job function and develop training programs tailored to each job function with consideration of the individual training needs of the personnel. However, in responding to the proposals to expand the applicability of the Reliability Standard, many commenters acknowledged the need to have clear training expectations and training programs tailored to specific job functions. The Commission finds that these two modifications will enhance the training by focusing on expectations and tailoring the training to specific job functions; therefore, the Commission adopts these modifications to the Reliability Standard"

Assigned: Project 2006-01 - System Personnel Training

Status: Regulator Approved Delivery: 2010

DIRECTIVE: S- Ref 10334 - Consider grandfathering certification requirements for transmission operator personnel as part of the standards development process.

Due 2/17/2011

Para 1407

"Consider grandfathering certification requirements for transmission operator personnel as part of the standards development process."

Assigned: Project 2007-04 - Certifying System Operators

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10333 - Specify the minimum competencies that must be demonstrated to become and remain a certified operator.

Due 2/17/2011

Para 1408

"Specify the minimum competencies that must be demonstrated to become and remain a certified operator."

Assigned: Project 2007-04 - Certifying System Operators

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10335 - Include formal training requirements for reliability coordinators similar to those addressed under PER-002.

Para 1415

"Include formal training requirements for reliability coordinators similar to those addressed under PER-002."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10336 - Consider the suggestions of FirstEnergy and Xcel as part of the standards development process.

Para 1417

"Consider the suggestions of FirstEnergy and Xcel as part of the standards development process."

Assigned: Project 2006-01 - System Personnel Training

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10339 - Clarify the term corrective action. 1440. We believe that [t]he transmission operator shall take corrective action as soon as possible refers to transmission operators taking operator control actions. It does not refer to troubleshooting

Para 1441

"Clarify the term corrective action. 1440. We believe that [t]he transmission operator shall take corrective action as soon as possible refers to transmission operators taking operator control actions. It does not refer to troubleshooting, repairing or replacing failed relays or equipment, etc., since these time-consuming corrective actions would prolong the risk of cascading failures to the Bulk-Power System. 1441. We direct the ERO to clarify the term corrective action consistent with this discussion when it modifies PRC-001-1 in the Reliability Standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10340 - Consider FirstEnergys and the California PUCs comments about the maximum time for corrective actions in the standards development process. 1428. California PUC contends that imposing a time restriction for returning a system to a stable sta

Para 1444

"Consider FirstEnergys and the California PUCs comments about the maximum time for corrective actions in the standards development process. 1428. California PUC contends that imposing a time restriction for returning a system to a stable state may cause more harm than good since additional information and options may be available as time elapses. It repeats its suggestion from its earlier comments on the Staff Preliminary Assessment and proposes the following alternative language: Transmission or generation operators shall carry out corrective control actions, i.e., returning the system to a stable state that respects system requirements as soon as possible, and no longer than 30 minutes, except where a longer response time is feasible, or where a longer response is demonstrated to produce a better ultimate solution without unacceptable interim risk. 1431. FirstEnergy contends that Requirement R2.1 essentially requires generator operators to report all protective relay or equipment failures, since generator operators may not be able to tell which failures will reduce system reliability. FirstEnergy suggests that R2.1 should be revised to require generator operators to report all equipment failures or outages. FirstEnergy further suggests that PRC-001-1 be revised to provide that if a company performs reasonable testing procedures, undiscoverable equipment failures will not be violations of R2.1."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10342 - Para 1445. In response to MidAmericans request that we clarify the term immediately in our proposed second directive, we direct the ERO, in the Reliability Standards development process, to determine the appropriate amount of time after the

Para 1445

"1445.In response to MidAmericans request that we clarify the term immediately in our proposed second directive, we direct the ERO, in the Reliability Standards development process, to determine the appropriate amount of time after the detection of relay failures, in which relevant transmission operators must be informed of such failures."

Assigned: Project 2007-03 - Real-Time Transmission Operations

DIRECTIVE: S- Ref 10341 - Upon detection of failures in relays or protection system elements on the bulk power system that threaten reliability, relevant transmission operators must be informed promptly, but within a specified period of time. -- (2) a requirement t

Para 1445

"Upon detection of failures in relays or protection system elements on the bulk power system that threaten reliability, relevant transmission operators must be informed promptly, but within a specified period of time. -- (2) a requirement that transmission and generator operators be informed immediately upon the detection of failures in relays or protection system elements on the Bulk-Power System that would threaten reliable operation, so that these entities could carry out appropriate corrective control actions consistent with those used in mitigating IROL violations."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10344 - Para's 1420 & 1449. Measures and levels of non-compliance incorrectly reference non-existent requirements.

Due 3/22/2013

Para 1446

"1420 & 1449. Measures and levels of non-compliance incorrectly reference non-existent requirements.

1420. In the NOPR, the Commission proposed to approve PRC-001-0 as mandatory and enforceable. In addition, the Commission proposed to direct NERC to submit modifications to PRC-001-0 (proposed directives) that included: (1) Measures and Levels of Non-Compliance...

1423. APPA states that while it agrees that PRC-001-1 is sufficient for approval, since the new Measures only partially address the Requirements, and in some cases refer to non-existent Requirements, no penalties should be levied for violations of Requirements that have no accompanying Measures.

1446. We agree with APPA that the added Measures and Levels of Non-Compliance incorrectly reference non-existent requirements. We direct the ERO to revise the references accordingly.

1449. The Commission approves Reliability Standard PRC-001-1 as mandatory and enforceable. In addition, the Commission directs the ERO to develop modifications to PRC-001-1 through the Reliability Standards development process that: (1) correct the references for Requirements and..."

Assigned: Project 2007-06 - System Protection Coordination

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10343 - Para 1420. Once informed, transmission operators must carry out corrective control actions that return the system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes. 1440. [t]he transmissi

"1420. Once informed, transmission operators must carry out corrective control actions that return the system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes.

1440. [t]he transmission operator shall take corrective action as soon as possible refers to transmission operators taking operator control actions. It does not refer to troubleshooting,

repairing or replacing failed relays or equipment, etc., since these time-consuming corrective actions would prolong the risk of cascading failures to the Bulk-Power System."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10345 - Consider if greater consistency can be achieved in the standard as suggested by Otter Tail, APPA, and Alcoa.

Para 1456

"Consider if greater consistency can be achieved in the standard as suggested by Otter Tail, APPA, and Alcoa."

Assigned: Project 2007-11 - Disturbance Monitoring

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10349 - Consider ISO-NEs suggestion that LSEs and transmission operators should be listed as applicable entities.

Para 1469

"Consider ISO-NEs suggestion that LSEs and transmission operators should be listed as applicable entities."

Assigned: Project 2010-05.1 - Phase 1 of Protection Systems: Misoperations

DIRECTIVE: S- Ref 10350 - The regional entity should develop procedures for corrective action plans.

Para 1469

"The regional entity should develop procedures for corrective action plans."

Assigned: Project 2010-05.1 - Phase 1 of Protection Systems: Misoperations

DIRECTIVE: S- Ref 10351 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.

Due 4/10/2012

Para 1475

"1475. In addition, for the reasons discussed in the NOPR, the Commission directs the ERO to develop a modification to PRC-005-1 through the Reliability Standards development process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10352 - Consider FirstEnergys and ISO-NEs suggestions to combine PRC-005, PRC-008, PRC-011, and PRC-017 into a single standard.

Para 1475

"Consider FirstEnergys and ISO-NEs suggestions to combine PRC-005, PRC-008, PRC-011, and PRC-017 into a single standard."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10353 - Transfer responsibility from the regional reliability organization to the regional entity.

Para 1480

"Transfer responsibility from the regional reliability organization to the regional entity."

Assigned: Project 2007-01 - Underfrequency Load Shedding

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10355 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.

Due 4/10/2012

Para 1492

"1492. In addition, the Commission directs the ERO to develop a modification to PRC-008-0 through the Reliability Standards development process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10356 - Require that an integrated and coordinated approach be included in all protection systems on the bulk power system, including generators and transmission lines, generators low-voltage ride-through capabilities, and UFLS and UVLS systems. P

Para 1509

"Require that an integrated and coordinated approach be included in all protection systems on the bulk power system, including generators and transmission lines, generators low-voltage ride-through capabilities, and UFLS and UVLS systems. Paragraph 1509. We appreciate MEAGs feedback to our response in the NOPR. For the reasons discussed in the NOPR, as well as our explanation above, the Commission approves Reliability Standard PRC-010-0 as mandatory and enforceable. In addition, the Commission directs the ERO to develop a modification to PRC-010-0 through the Reliability Standards development process that requires that an integrated and coordinated approach be included in all protection systems on the Bulk-Power System, including generators and transmission lines, generators low voltage ride-through capabilities, and UFLS and UVLS programs."

Assigned: Project 2008-02 - Undervoltage Load Shedding

Status: In Drafting

DIRECTIVE: S- Ref 10358 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.

Due 4/10/2012

Para 1516

"1516. The Commission believes that the proposal is presently part of the process. The Commission approves Reliability Standard PRC-011-0 as mandatory and enforceable. In addition, the Commission directs the ERO to submit a modification to PRC-011-0 through the Reliability Standards development process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10359 - Consider APPAs suggestions for interconnection-wide consistency in the standards development process.

Para 1520

"Consider APPAs suggestions for interconnection-wide consistency in the standards development process."

Assigned: Project 2008-04 - Facility Ratings - Order 705

Status: In Drafting

DIRECTIVE: S- Ref 10360 - Consider APPAs suggestions for interconnection-wide consistency in the standards development process.

Para 1524

"Consider APPAs suggestions for interconnection-wide consistency in the standards development process."

Assigned: Project 2009-04 - Phasor Measurement Units

Status: In Drafting

DIRECTIVE: S- Ref 10361 - Consider APPAs suggestions for interconnection-wide consistency in the standards development process.

Para 1528

"Consider APPAs suggestions for interconnection-wide consistency in the standards development process."

Assigned: Project 2008-04 - Facility Ratings - Order 705

Status: In Drafting

DIRECTIVE: S- Ref 10363 - Require that documentation identified in requirement R2 be routinely provided to NERC or the regional entity. that includes: (1) and (2) a requirement that documentation identified in Requirement R2 shall be routinely provided to the ERO

Due 12/31/2014

Para 1546

"Require that documentation identified in requirement R2 be routinely provided to NERC or the regional entity. that includes: (1) and (2) a requirement that documentation identified in Requirement R2 shall be routinely provided to the ERO or Regional Entity"

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10362 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.

Para 1546

"Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10364 - Consider FirstEnergys suggestions to revise requirement R1.3 as part of the standards development process. Paragraph 1564. FirstEnergy comments that Requirement R1.3 requires a simulation of the event, if deemed appropriate by the RRO and

Para 1566

"Consider FirstEnergys suggestions to revise requirement R1.3 as part of the standards development process. Paragraph 1564. FirstEnergy comments that Requirement R1.3 requires a simulation of the event, if deemed appropriate by the RRO and believes that the applicable entities such as transmission operators may not be able to simulate large system events. FirstEnergy suggests that Requirement R1.3 be revised to state that a simulation of the event, if deemed appropriate, and assisted by the [regional reliability organization]."

Assigned: Project 2008-02 - Undervoltage Load Shedding

Status: In Drafting

DIRECTIVE: S- Ref 10367 - Consider adding other measures and levels of non-compliance.

Para 1580

"Consider adding other measures and levels of non-compliance."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10368 - Clarify the definition of emergency and define the criteria for entering into the various states. Also define the authority for declaring these states.

Para 1585
"Clarify the definition of emergency and define the criteria for entering into the various states. Also define the authority for declaring these states."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10366 - Consider Santa Claras comments on requirements R7.2 and R7.3 on transmission operator notification requirements as part of the standards development process.

Para 1588
"Consider Santa Claras comments on requirements R7.2 and R7.3 on transmission operator notification requirements as part of the standards development process."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10373 - Address critical energy infrastructure confidentiality as part of the routine standard development process.

Para 1600
"Address critical energy infrastructure confidentiality as part of the routine standard development process."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10369 - Para 1608 - Next-day analysis for all IROLs must identify and communicate control actions to system operators that can be implemented within 30 minutes following a contingency.

"1608 - Next-day analysis for all IROLs must identify and communicate control actions to system operators that can be implemented within 30 minutes following a contingency."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10374 - Inform the nuclear plant operator in real-time if the auxiliary power bus voltages cannot be maintained.

Para 1603
"Inform the nuclear plant operator in real-time if the auxiliary power bus voltages cannot be maintained."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10370 - Para 1608 - Requires next-day analysis of minimum voltages at nuclear power plants auxiliary power buses.

"1608 - Requires next-day analysis of minimum voltages at nuclear power plants auxiliary power buses."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10371 - Par 1608 - Requires simulation contingencies to match what will actually happen in the field.

"1608 - Requires simulation contingencies to match what will actually happen in the field."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10375 - Commenters did not take issue with the proposed interpretation of the term deliverability as the ability to deliver the output from generation resources to firm load without any reliability criteria violations for plausible generation dispa

Para 1606

"Commenters did not take issue with the proposed interpretation of the term deliverability as the ability to deliver the output from generation resources to firm load without any reliability criteria violations for plausible generation dispatches. The Commission adopts this proposed interpretation. In order to ensure the necessary clarity, the term as used in Requirement R7 of TOP-002-2 should be understood in this manner."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10372 - Consider the comments of ISO-NE and the NRC with respect to requirement R12 and measure M7 as part of the standard development process.

Para 1607

"Consider the comments of ISO-NE and the NRC with respect to requirement R12 and measure M7 as part of the standard development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10376 - Para 1626 - Communicate scheduled outages to all affected entities well in advance to ensure reliability and accuracy of ATC calculations.

"1626 - Communicate scheduled outages to all affected entities well in advance to ensure reliability and accuracy of ATC calculations."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10377 - Para 1626 - Incorporate an appropriate lead time for planned outages using suggestions from the various commenters.

"1626 - Incorporate an appropriate lead time for planned outages using suggestions from the various commenters."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10378 - Consider TVAs suggestion for including breaker outages within the meaning of facilities that are subject to advance notice for planned outages.

Para 1622

"Consider TVAs suggestion for including breaker outages within the meaning of facilities that are subject to advance notice for planned outages."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10379 - Require any facility, that in the opinion of the reliability coordinator, balancing authority, or transmission operator, will have a direct impact on the reliability of the bulk power system be subject to the requirement R1 for planned outa

Para 1624

"Require any facility, that in the opinion of the reliability coordinator, balancing authority, or transmission operator, will have a direct impact on the reliability of the bulk power system be subject to the requirement R1 for planned outage coordination"

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10380 - Para 1630 - Modify requirement R4 to state that the system should be restored to respect proven limits as soon as possible taking no more than 30 minutes.

"1630 - Modify requirement R4 to state that the system should be restored to respect proven limits as soon as possible taking no more than 30 minutes."

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10383 - Para 1628 - Perform a survey of the prevailing operating practices and actual operating experiences surrounding IROL limits.

"1628 - Perform a survey of the prevailing operating practices and actual operating experiences surrounding IROL limits."

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10381 - Para 1640 - Defines high risk conditions under which the system must be operated to respect multiple outages in requirement R3.

"1640 - Defines high risk conditions under which the system must be operated to respect multiple outages in requirement R3."

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10382 - Consider Santa Claras comments regarding changes to requirement R2 in the standards development process. (Santa Clara states that Requirement R2 of the Reliability Standard should be revised to include frequency monitoring in addition to th

Para 1639

"Consider Santa Claras comments regarding changes to requirement R2 in the standards development process. (Santa Clara states that Requirement R2 of the Reliability Standard should be revised to include frequency monitoring in addition to the monitoring of voltage, real and reactive power flows.)"

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10384 - Para 1651 - Include information about the operational status of special protection systems and power system stabilizers in Attachment 1.

"1651 - Include information about the operational status of special protection systems and power system stabilizers in Attachment 1."

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10385 - Delete references to confidentiality agreements but ensure critical energy infrastructure confidentiality is addressed in the standards development process.

Para 1649

"Delete references to confidentiality agreements but ensure critical energy infrastructure confidentiality is addressed in the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10386 - Consider FirstEnergys modifications to Attachment 1 and ISO-NEs recommended revision to requirement R4 in the standards development process. ISO-NE recommends that the reference to purchasing-selling entity in Requirement R4 should be repl

Para 1650

"Consider FirstEnergys modifications to Attachment 1 and ISO-NEs recommended revision to requirement R4 in the standards development process.

ISO-NE recommends that the reference to purchasing-selling entity in Requirement R4 should be replaced with generator owner, transmission owner, and LSE."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10388 - Para 1653 - Clarify the meaning of appropriate technical information concerning protective relays.

"1653 - Clarify the meaning of appropriate technical information concerning protective relays."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10389 - Para 1658 - Consider APPAs comments regarding missing measures in the standards development process.

"1658 - Consider APPAs comments regarding missing measures in the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10390 - Para 1668 - Eliminate overlapping matters in TOP-007 and TOP-008.

"1668 - Eliminate overlapping matters in TOP-007 and TOP-008."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10391 - Para 1671 - Consider the NRCs comments on voltage requirements as part of the standards development process.

"1671 - Consider the NRCs comments on voltage requirements as part of the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10392 - Para 1678 - Consider APPAs comments regarding missing measures in the standards development process.

Para 1681

"1678 - Consider APPAs comments regarding missing measures in the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10404 - Para's 1694, 1704, & 1706 - Consider the full range of variables when determining critical system conditions but only those deemed to be significant need to be assessed and documentation provided that explain the rational for selection.

Para 1765

"1694, 1704, & 1706 - Consider the full range of variables when determining critical system conditions but only those deemed to be significant need to be assessed and documentation provided that explain the rational for selection.

Determine critical system conditions and study years by conducting sensitivity analysis with due consideration of the factors outlined by the Commission."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10405 - Para 1751 - Require a peer review of planning assessments with neighboring entities

Para 1766

"1751 - Require a peer review of planning assessments with neighboring entities"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10406 - Para 1759 - Modify requirement R1.3 to substitute the reference to regional reliability organization with regional entity.

Para 1767

"1759 - Modify requirement R1.3 to substitute the reference to regional reliability organization with regional entity."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10407 - Para 1786 - Require assessments of outages of critical long lead time equipment, consistent with an entity's spare equipment strategy

Para 1768

"1786 - Require assessments of outages of critical long lead time equipment, consistent with an entity's spare equipment strategy"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10408 - Para 1797 - Address concerns with footnote (a) of Table 1 with regard to applicability of emergency ratings and consistency of normal ratings and voltages with values obtained from other reliability standards and concerns raised by Internat

Para 1769

"1797 - Address concerns with footnote (a) of Table 1 with regard to applicability of emergency ratings and consistency of normal ratings and voltages with values obtained from other reliability standards and concerns raised by International Transmission with regard to the footnotes in Table 1"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10409 - Para's 1694, 1704, & 1706 - Determine critical system conditions in the same manner as proposed in TPL-001.

Para 1785

"1694, 1704, & 1706 - Determine critical system conditions in the same manner as proposed in TPL-001."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10410 - Requires assessment of planned outages of long lead time critical equipment consistent with the entitys spare equipment strategy.

Para 1786

"Requires assessment of planned outages of long lead time critical equipment consistent with the entitys spare equipment strategy."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10365 - Requires all generators to ride through the same set of category B and C contingencies as required by wind generators in Order No. 661, or to simulate without this capability as tripping.

Para 1787

"1787.In the NOPR, the Commission identified an implicit assumption in the TPL Reliability Standards that all generators are required to ride through the same types of voltage disturbances and remain in service after the fault is cleared. This implicit assumption should be made explicit. Commenters agree with the proposed requirement for all generators to ride through the same set of Category B and C events as required for wind generators. The Commission understands that NRC has both degraded voltage and loss of voltage requirements. The degraded voltage requirement allows the voltage at the auxiliary power system busses to go below the minimum value for a time frame that is usually much longer than normal fault clearing time. If a specific nuclear power plant has an NRC requirement that would force it to trip off-line if its auxiliary power system voltage was depressed below some minimum voltage, the simulation should include the tripping of the plant in addition to the faulted facilities. In this regard, the Commission agrees that NRC requirements should be used when implementing the Reliability Standards. Using NRC requirements as input will assure that there is consistency between the Reliability Standards and the NRC requirement that the system is accurately modeled. Accordingly, the Commission directs the ERO to modify the Reliability Standard to explicitly require either that all generators are capable of riding through the same set of Category B and C contingencies, as required by wind generators in Order No. 661, or that those generators that cannot ride through be simulated as tripping. If a generator trips due to low voltage from a single contingency, the initial trip of the faulted element and the resulting trip of the generator would be governed by Category B contingencies and performance criteria."

Assigned: Project 2007-09 - Generator Verification

DIRECTIVE: S- Ref 10411 - Requires all generators to ride through the same set of category B and C contingencies as required by wind generators in Order No. 661, or to simulate without this capability as tripping.

Para 1787

"Requires all generators to ride through the same set of category B and C contingencies as required by wind generators in Order No. 661, or to simulate without this capability as tripping."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10414 - Consider NRCs comments regarding clarifying the N-1 state as being always applicable to the current conditions as part of the standards development process.

Para 1788

"Consider NRCs comments regarding clarifying the N-1 state as being always applicable to the current conditions as part of the standards development process."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10412 - Document the load models used in system studies and the rationale for their use.

Para 1789

"Document the load models used in system studies and the rationale for their use."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10413 - Para 1773 - Clarify the phrase permit operating steps necessary to maintain system control in the footnote (a) and the use of emergency ratings.

Para 1790

"1773 - Clarify the phrase permit operating steps necessary to maintain system control in the footnote (a) and the use of emergency ratings."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10417 - Regarding the comments of Entergy and Northern Indiana that the Reliability Standard should allow entities to plan for the loss of firm service for a single contingency, the Commission finds that their comments may be considered through the

Para 1794

"Regarding the comments of Entergy and Northern Indiana that the Reliability Standard should allow entities to plan for the loss of firm service for a single contingency, the Commission finds that their comments may be considered through the Reliability Standards development process. However, we strongly discourage an approach that reflects the lowest common denominator"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10415 - Standard should be clarified to not allow an entity to plan for the loss of non-consequential load in the event of a single contingency.

Para 1794

"Standard should be clarified to not allow an entity to plan for the loss of non-consequential load in the event of a single contingency."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10416 - Commission, therefore, suggests that the ERO consider developing a ceiling on the amount and duration of consequential load loss that will be acceptable. If the ERO determines that such a ceiling is appropriate, it should be developed throu

Para 1795

"Commission, therefore, suggests that the ERO consider developing a ceiling on the amount and duration of consequential load loss that will be acceptable. If the ERO determines that such a ceiling is appropriate, it should be developed through the EROs Reliability Standards development process"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10418 - The Commission, therefore, directs the ERO to modify the second sentence of footnote (b) to clarify that manual system adjustments other than shedding of firm load or curtailment of firm transfers are permitted to return the system to a nor

Para 1796

"The Commission, therefore, directs the ERO to modify the second sentence of footnote (b) to clarify that manual system adjustments other than shedding of firm load or curtailment of firm transfers are permitted to return the system to a normal operating state after the first contingency, provided these adjustment can be accomplished within the time period allowed by the short term or emergency ratings."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10420 - 1806 - Clarify the term controlled load interruption.

Para 1818

"1806 - Clarify the term controlled load interruption."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10421 - Applicable entities must define and document the proxies necessary to simulate cascading outages.

Para 1820

"Applicable entities must define and document the proxies necessary to simulate cascading outages."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10422 - Para 1821 - Tailor the purpose statement to reflect the specific goal of the standard.

Para 1821

"1821 - Tailor the purpose statement to reflect the specific goal of the standard."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10423 - Para 1788 - Address NRC concerns as described in TPL-002 through the standards development process.

Para 1822

"1788 - Address NRC concerns as described in TPL-002 through the standards development process."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10424 - Consider the comments on major load pockets as part of the standards development process.

Para 1824

"Consider the comments on major load pockets as part of the standards development process."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10425 - Para 1765 - Determine critical system conditions in the same manner as proposed in TPL-001.

Para 1832

"1765 - Determine critical system conditions in the same manner as proposed in TPL-001."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10426 - Para 1836 - Identify options for reducing the probability or impacts of extreme events that cause cascading.

Para 1833

"1836 - Identify options for reducing the probability or impacts of extreme events that cause cascading."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10427 - Para 1836 - Expand the list of category D events to include recent actual events.

Para 1834

"1836 - Expand the list of category D events to include recent actual events."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10428 - Tailor the purpose statement to reflect the specific goal of the standard.

Para 1835

"Tailor the purpose statement to reflect the specific goal of the standard."

Assigned: Project 2006-02 - Assess Transmission Future Needs

DIRECTIVE: S- Ref 10429 - Encourages NERC to utilize input from the Commissions technical conferences on regional planning as directed in Order No. 890 to improve this standard.

Para 1841

"Encourages NERC to utilize input from the Commissions technical conferences on regional planning as directed in Order No. 890 to improve this standard."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10430 - Para 1855. Since a reliability coordinator is the highest level of authority overseeing the reliability of the Bulk-Power System, the Commission believes that it is important to include the reliability coordinator as an applicable entity …

Para 1855

"Expand the applicability to include LSEs and reliability coordinators and define the reliability coordinators monitoring responsibilities. 1855. Since a reliability coordinator is the highest level of authority overseeing the reliability of the Bulk-Power System, the Commission believes that it is important to include the reliability coordinator as an applicable entity to assure that adequate voltage and reactive resources are being maintained. As MISO points out, other Reliability Standards address responsibilities of reliability coordinators, but we agree with EEI that it is important to include reliability coordinators in VAR-001-1 as well. Reliability coordinators have responsibilities in the IRO and TOP Reliability Standards, but not the specific responsibilities for voltage levels and reactive resources addressed by VAR-001-1, which have a great impact on system reliability. For example, voltage levels and reactive resources are important factors to ensure that IROLs are valid and operating voltages are within limits, and that reliability coordinators should have responsibilities in VAR-001-1 to monitor that sufficient reactive resources are available for reliable systemoperations. Accordingly, the ERO should modify VAR-001-1 to include reliability coordinators as applicable entities and include a new requirement(s) that identifies the reliability coordinators monitoring responsibilities."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10431 - Address reactive power requirements for LSEs on a comparable basis with purchasing-selling entities

Para 1858

"Address reactive power requirements for LSEs on a comparable basis with purchasing-selling entities. Paragraph 1856. The Commission agrees with SoCal Edison that not all LSEs are purchasingselling entities, because not all LSEs purchase or sell power from outside of their balancing authority area. This understanding is consistent with the NERC functional model and NERC glossary. Both LSEs and purchasing-selling entities should have some requirements to provide reactive power to appropriately compensate for the demand they are meeting for their customers. Neither a purchasing-selling entity nor a LSE should depend on the transmission operator to supply reactive power for their loads during
normal or emergency conditions."

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10440 - Address the power factor range at the interface between LSEs and the transmission grid. Paragraph 1861. In the NOPR, the Commission asked for comments on acceptable ranges of net power factor at the interface at which the LSEs receive serv

Para 1862

"Address the power factor range at the interface between LSEs and the transmission grid. Paragraph 1861. In the NOPR, the Commission asked for comments on acceptable ranges of net power factor at the interface at which the LSEs receive service from the Bulk-Power System during normal and extreme load conditions. The Commission asked for these comments in response to concerns that during high loads, if the power factor at the interface between many LSEs and the Bulk-Power System is so low as to result in low voltages at key busses on the Bulk-Power System, then there is risk for voltage collapse. The Commission believes that Reliability Standard VAR-001-1 is an appropriate place for the ERO to take steps to address these concerns by setting out requirements for transmission owners and LSEs to maintain an appropriate power factor range at their interface. We direct the ERO to develop appropriate modifications to this Reliability Standard to address the power factor range at the interface between LSEs and the Bulk-Power System.

1862. We direct the ERO to include APPAs concern in the Reliability Standards development process. We note that transmission operators currently have access to data through their energy management systems to determine a range of power factors at which load operates during various conditions, and we suggest that the ERO use this type of data as a starting point for developing this modification.

1863. The Commission expects that the appropriate power factor range developed for the interface between the bulk electric system and the LSE from VAR-001-1 would be used as an input to the transmission and operations planning Reliability Standards. The range of power factors developed in this Reliability Standard provides the input to the range of power factors identified in the modifications to the TPL Reliability Standards. In the NOPR, the Commission suggested that sensitivity studies for the TPL Reliability Standards should consider the range of load power factors."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10432 - Include APPAs comments regarding varying power factor requirements due to system conditions and equipment in the standards development process.

Para 1862

"Include APPAs comments regarding varying power factor requirements due to system conditions and equipment in the standards development process."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10441 - The Commission expects that the appropriate power factor range developed for the interface between the bulk electric system and the LSE from VAR-001-1 would be used as an input to the transmission and operations planning Reliability Standar

Para 1863

"The Commission expects that the appropriate power factor range developed for the interface between the bulk electric system and the LSE from VAR-001-1 would be used as an input to the transmission and operations planning Reliability Standards. The range of power factors developed in this Reliability Standard provides the input to the range of power factors identified in the modifications to the TPL Reliability Standards. In the NOPR, the Commission suggested that sensitivity studies for the TPL Reliability Standards should consider the range of load power factors."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2014

DIRECTIVE: S- Ref 10433 - In the NOPR, the Commission expressed concern that the technical requirements containing terms such as established limits or sufficient reactive resources are not definitive enough to address voltage instability and ensure reliable operatio

Para 1868

"In the NOPR, the Commission expressed concern that the technical requirements containing terms such as established limits or sufficient reactive resources are not definitive enough to address voltage instability and ensure reliable operations. To address this concern, the NOPR proposed directing the ERO to modify VAR-001-1 to include more detailed and definitive requirements on established limits and sufficient reactive resources and identify acceptable margins (i.e. voltage and/or reactive power margins) above voltage instability points to prevent voltage instability and to ensure reliable operations. We will keep this direction, and direct the ERO to include this modification in this Reliability Standard."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10436 - Address the concerns of Dynegy, EEI, and MISO through the standards development process. Paragraph 1864. Dynegy supports the Commissions proposal to include more definitive requirements on established limits and sufficient reactive resourc

Para 1869

"Address the concerns of Dynegy, EEI, and MISO through the standards development process. Paragraph 1864. Dynegy supports the Commissions proposal to include more definitive requirements on established limits and sufficient reactive resources. It recommends that VAR-001-1 be further modified to require the transmission operator to have more detailed and definitive requirements when setting the voltage schedule and associated tolerance band that is to be maintained by the generator operator. Dynegy states that the transmission operator should not be allowed to arbitrarily set these values, but rather should be required to have a technical basis for setting the required voltage schedule and tolerance band that takes into account system needs and any limitations of the specific generator. Dynegy believes that such a requirement would eliminate the potential for undue discrimination, as well as the possibility of imposing overly conservative and burdensome voltage schedules and tolerance bands on generator operators that could be detrimental to grid reliability, or conversely, the imposition of too low a voltage schedule and too wide a tolerance band that could also be detrimental to grid reliability.

1865. While MISO supports the concept of including more detailed requirements, it believes that there needs to be a definitive reason for establishing voltage schedules and tolerances, and that any situations monitored in this Reliability Standard need to be limited to core reliability requirements.

1866. EEI seeks clarification about whether the Commission is suggesting that reactive requirements should aim for significantly greater precision, especially in terms of planning for various emergency conditions. If so, EEI cautions the Commission against putting too many eggs in the reactive power basket.474 To the extent compliance takes place pursuant to all other modeling and planning assessments under the other Reliability Standards, EEI strongly believes that the Commission should have some high level of confidence that the systems reactive power needs can be met satisfactorily across a broad range of contingencies that planners might reasonably anticipate. Moreover, EEI believes that requirements to successfully predict reactive power requirements in conditions of near-system collapse would require significantly more creative guesswork than solid analysis and contingency planning. For example, EEI notes that the combinations and permutations of how a voltage collapse could occur on a system as large as the eastern Interconnection are numerous.

1867. EEI suggests that, alternatively, the Commission should consider that reactive power evaluations should be conducted within a process that is documented in detail and includes a range of contingencies that might be reasonably anticipated, because this would avoid the one size fits all problem, where a prescriptive analytical methodology does not fit with a particular system configuration. EEI believes that this flexible approach would provide a more effective planning

tool for the industry, while satisfying the Commissions concerns over potentially inadequate reactive reserves. MRO notes that the need for, and method of providing for, reactive resources varies greatly, and if this Reliability Standard is expanded it must be done carefully. MRO believes that all entities should not be required to follow the same methodology to accomplish the goal of a reliable system."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10434 - Para 1869 We recognize that our proposed modification does not identify what definitive requirements the Reliability Standard should use for established limits and sufficient reactive resources. Rather, the ERO should develop appropriate

Para 1869

"1869.We recognize that our proposed modification does not identify what definitive requirements the Reliability Standard should use for established limits and sufficient reactive resources. Rather, the ERO should develop appropriate requirements that address the Commissions concerns through the ERO Reliability Standards development process. The Commission believes that the concerns of Dynegy, EEI and MISO are best addressed by the ERO in the Reliability Standards development process."

Assigned: Project 2008-01 - Voltage and Reactive Control

DIRECTIVE: S- Ref 10437 - Perform voltage analysis periodically, using on-line techniques where commercially available and off-line techniques where not available on-line, to assist real-time operations, for areas susceptible to voltage instability. Paragraph 1875.

Para 1875

"Perform voltage analysis periodically, using on-line techniques where commercially available and off-line techniques where not available on-line, to assist real-time operations, for areas susceptible to voltage instability. Paragraph 1875. In response to the concerns of APPA, SDG&E and EEI on the availability of tools, the Commission recognizes that transient voltage stability analysis is often conducted as an offline study, and that steady-state voltage stability analysis can be done online. The Commission clarifies that it does not wish to require anyone to use tools that are not validated for real-time operations. Taking these comments into consideration, the Commission clarifies its proposed modification from the NOPR. For the Final Rule, we direct the ERO, through its Reliability Standards development process, to modify Reliability Standard VAR-001-1 to include Requirements to perform voltage stability analysis periodically, using online techniques where commercially-available, and offline simulation tools where online tools are not available, to assist real-time operations. The ERO should consider the available technologies and software as it develops this modification to VAR-001-1 and identify a process to assure that the Reliability Standard is not limiting the application of validated software or other tools."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10438 - Include controllable load among the reactive resources to satisfy reactive requirements, considering the comments of Southern California Edison and SMA in the development of the standard. Paragraph 1879. The Commission noted in the NOPR th

Para 1879

"Include controllable load among the reactive resources to satisfy reactive requirements, considering the comments of Southern California Edison and SMA in the development of the standard. Paragraph 1879. The Commission noted in the NOPR that in many cases, load response and demand-side investment can reduce the need for reactive power capability in the system.476 Based on this assertion, the Commission proposed to direct the ERO to include controllable load among the reactive resources to satisfy reactive requirements for incorporation into Reliability Standard VAR-001-1. While we affirm this requirement, we expect the ERO to consider the comments of SoCal Edison with regard to reliability and SMA in its process for developing the

technical capability requirements for using controllable load as a reactive resource in the applicable Reliability Standards.

1877. SMA supports adoption of the proposal to include controllable load as a reactive resource. SMA notes that its members facilities often include significant capacitor banks, and further, reducing load can reduce local reactive requirements.

1878. SoCal Edison suggests caution regarding the Commissions proposal to include controllable load as a reactive resource. It agrees that, when load is reduced, voltage will increase and for that reason controllable load can lessen the need for reactive power. However, SoCal Edison believes that controllable load is typically an energy product and there are other impacts not considered by the Commissions proposal to include controllable load as a reactive resource. For example, activating controllable load for system voltage control lessens system demand, requiring generation to be backed down. It is not clear to SoCal Edison whether any consideration has been given to the potential reliability or commercial impacts of the Commissions proposal."

Assigned: Project 2008-01 - Voltage and Reactive Control

DIRECTIVE: S- Ref 10439 - we expect the ERO to consider the comments of SoCal Edison with regard to reliability and SMA in its process for developing the technical capability requirements for using controllable load as a reactive resource in the applicable Reliabili

Para 1879

"we expect the ERO to consider the comments of SoCal Edison with regard to reliability and SMA in its process for developing the technical capability requirements for using controllable load as a reactive resource in the applicable Reliability Standards"

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2012

DIRECTIVE: S- Ref 10442 - Consider Dynegys suggestion to improve the standard. Paragraph 1883. Dynegy believes that VAR-002-1 should be modified to require more detailed and definitive requirements when defining the time frame associated with an incident of non com

Para 1885

"Consider Dynegys suggestion to improve the standard. Paragraph 1883. Dynegy believes that VAR-002-1 should be modified to require more detailed and definitive requirements when defining the time frame associated with an incident of non compliance (i.e., each 4-second scan, 10-minute integrated value, hourly integrated value). Dynegy states that, as written, this Reliability Standard does not define the time frame associated with an incident of non-compliance, but apparently leaves this decision to the transmission operator. Dynegy believes that either more detail should be added to the Reliability Standard to cure this omission, or the Reliability Standard should require the transmission operator to have a technical basis for setting the time frame that takes into account system needs and any limitations of the generator. Dynegy believes that this approach will eliminate the potential for undue discrimination and the imposition of overly conservative or excessively wide time frame requirements, both of which could be detrimental to grid reliability."

Assigned: Project 2008-01 - Voltage and Reactive Control

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10002 - Include the statutory definition for Bulk Power System to the NERC Glossary.

Para 1894

"Include the statutory definition for Bulk Power System to the NERC Glossary."

Not assigned to any project.

DIRECTIVE: S- Ref 10004 - Include the statutory definition for Reliability Standard to the NERC Glossary.

Para 1894

"Include the statutory definition for Reliability Standard to the NERC Glossary."

Not assigned to any project.

DIRECTIVE: S- Ref 10003 - Include the statutory definition for Reliable Operation to the NERC Glossary.

Para 1894

"Include the statutory definition for Reliable Operation to the NERC Glossary."

Not assigned to any project.

DIRECTIVE: S- Ref 10005 - Modify the term Generator Operator based on discussion in the Order.

Para 1895

"Modify the term Generator Operator based on discussion in the Order."

Not assigned to any project.

DIRECTIVE: S- Ref 10006 - Modify the term Transmission Operator based on discussion in the Order.

Para 1895

"Modify the term Transmission Operator based on discussion in the Order."

Not assigned to any project.

DIRECTIVE: S- Ref 10001 - Modify the term Operating Reserves in the NERC Glossary based on discussion in BAL002 and BAL-005

Para 1896

"Modify the term Operating Reserves in the NERC Glossary based on discussion in BAL002 and BAL-005"

Not assigned to any project.

DIRECTIVE: S- Ref 10008 - Regional Differences to BAL-001-0: ERCOT Control Performance Standard 2: Include requirements concerning frequency response contained in Section 5 of the ERCOT protocols. Paragraph 313. The Commission approves the ERCOT regional difference

Para 315

"Regional Differences to BAL-001-0: ERCOT Control Performance Standard 2: Include requirements concerning frequency response contained in Section 5 of the ERCOT protocols. Paragraph 313. The Commission approves the ERCOT regional difference as mandatory and enforceable. Order No. 672 explains that uniformity of Reliability Standards should be the goal and the practice, the rule rather than the exception. However, the Commission has stated that, as a general matter, regional differences are permissible if they are either more stringent than the continent-wide Reliability Standard, or if they are necessitated by a physical difference in the Bulk-Power System. Regional differences must still be just, reasonable, not unduly discriminatory or preferential and in the public interest.

314. The Commission finds that ERCOTs approach under section 5 of the ERCOT protocols appears to be a more stringent practice than Requirement R2 in BAL-001-0 and therefore approves the regional difference.

315. As proposed in the NOPR, the Commission directs the ERO to file a modification of the ERCOT regional difference to include the requirements concerning frequency response contained in section 5 of the ERCOT protocols. As with other new regional differences, the Commission expects that the ERCOT regional difference will include Requirements, Measures and Levels of Non-Compliance sections."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10010 - Substitute regional entity for regional reliability organization as the compliance monitor

Para 321

"Substitute regional entity for regional reliability organization as the compliance monitor"

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10009 - Modify to make requirements R4.2 and R6.2 refer to NERC rather than the NERC Operating Committee.

Para 321

"Modify to make requirements R4.2 and R6.2 refer to NERC rather than the NERC Operating Committee."

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10011 - Include a requirement that explicitly provides that DSM may be used as a resource for contingency reserves.

Para 330

"Include a requirement that explicitly provides that DSM may be used as a resource for contingency reserves."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10012 - Include a continent-wide contingency reserve policy

Para 340

"Include a continent-wide contingency reserve policy"

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10013 - Address Commission concerns about having enough contingency reserves to respond to an event on the system in requirement 3.1 and how such reserves are measured.

Para 351

"Address Commission concerns about having enough contingency reserves to respond to an event on the system in requirement 3.1 and how such reserves are measured."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10014 - Requires any single reportable disturbance that has a recovery time of 15 minutes or longer be reported as a violation.

Para 354

"Requires any single reportable disturbance that has a recovery time of 15 minutes or longer be reported as a violation."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10015 - Define a significant (frequency) deviation and a reportable event, taking into account all events that have an impact on frequency, and how balancing authorities should respond.

Para 355

"Define a significant (frequency) deviation and a reportable event, taking into account all events that have an impact on frequency, and how balancing authorities should respond."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: Ref 10016 -Determine the appropriate periodicity of frequency response surveys necessary to ensure requirement R2 and other requirements are being met; also modify measure M1 based on this determination.

Due 5/31/2012

Para 369

"Determine the appropriate periodicity of frequency response surveys necessary to ensure requirement R2 and other requirements are being met; also modify measure M1 based on this determination."

Assigned: Project 2007-12 - Frequency Response

Status: In Drafting Delivery: 2011

DIRECTIVE: Ref 10017 - Define the necessary amount of frequency response needed for reliable operation for each balancing authority with methods of obtaining and measuring that the frequency response is achieved.

Due 5/31/2012

Para 372

"Define the necessary amount of frequency response needed for reliable operation for each balancing authority with methods of obtaining and measuring that the frequency response is achieved."

Assigned: Project 2007-12 - Frequency Response

Status: In Drafting Delivery: 2011

DIRECTIVE: Ref 10021 - Modify BAL-003 to include Levels of Non-Compliance

Para 375

"Modify BAL-003 to include Levels of Non-Compliance"

Assigned: Project 2007-12 - Frequency Response

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10022 - Include levels of non-compliance and additional measures for requirement R3.

Para 382

"Include levels of non-compliance and additional measures for requirement R3."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10023 - In the five-year review cycle of the standard, perform research that would provide a technical basis for the present or any alternative approach that is more effective and helps reduce inadvertent interchange.

Para 382

"In the five-year review cycle of the standard, perform research that would provide a technical basis for the present or any alternative approach that is more effective and helps reduce inadvertent interchange."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10029 - Develop a process to calculate the minimum regulating reserve for a balancing authority, taking into account expected load and generation variation and transactions being ramped in and out.

Para 396

"Develop a process to calculate the minimum regulating reserve for a balancing authority, taking into account expected load and generation variation and transactions being ramped in and out."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10030 - Change title to be neutral as to the source of regulating reserves and allows the inclusion of technically qualified DSM.

Para 404

"Change title to be neutral as to the source of regulating reserves and allows the inclusion of technically qualified DSM."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10033 - Para 406. Given that most of the commenters concerns over the inclusion of DSM as part of regulating reserves relate to the technical requirements, the Commission clarifies that to qualify as regulating reserves, these resources must be tec

Para 406

"406.Given that most of the commenters concerns over the inclusion of DSM as part of regulating reserves relate to the technical requirements, the Commission clarifies that to qualify as regulating reserves, these resources must be technically capable of providing the service. In particular, all resources providing regulation must be capable of automatically responding to real-time changes in load on an equivalent basis to the response of generation equipped with automatic generation control. From the examples provided above, the Commission understands that it may be technically possible for DSM to meet equivalent requirements as conventional generators and expects the Reliability Standards development process to provide the qualifications they must meet to participate. These qualifications will be reviewed by the Commission when the revised Reliability Standard is submitted to the Commission for approval."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

DIRECTIVE: S- Ref 10031 - Address comments of Xcel and FirstEnergy when the standard is revisited in the work plan. Xcel requests that the Commission reconsider Requirement R17 of this Reliability Standard stating that the accuracy ratings for older equipment (cu

Para 415

"Address comments of Xcel and FirstEnergy when the standard is revisited in the work plan.

Xcel requests that the Commission reconsider Requirement R17 of this Reliability Standard stating that the accuracy ratings for older equipment (current and potential transformers) may be difficult to determine and may require the costly replacement of this older equipment on combustion turbines and older units while adding little benefit to reliability. Xcel states that the Commission should clarify that Requirement R17 need only apply to interchange metering of the balancing area in those cases where errors in generating metering are captured in the imbalance responsibility calculation of the balancing area.

FirstEnergy suggests that a single entity should have the responsibility to establish, through an annual review process, the level of regulating reserves that a balancing authority must maintain pursuant to the control performance standard requirements.

FirstEnergy suggests that all generators and technically qualified DSM that participate in energy markets should install automatic generation control as a condition of market participation. In non-market areas, FirstEnergy suggests that balancing authorities could meet requirements through bilateral contracts or the normal scheduling process and suggests that the Commission might have to assert its jurisdiction and order technically qualified DSM providers to install automatic generation control at their facilities. FirstEnergy states that further work would need to be conducted on the technical qualifications and capacity thresholds that would control whether installation of automatic generation control would be required.

FirstEnergy states that Requirement R17 should include only control center devices instead of devices at each substation. FirstEnergy states that accuracy at the substation level is unnecessary and the costs to install automatic generation control equipment at each substation would be high. FirstEnergy also states that the term check in Requirement R17 needs to be clarified."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10034 - Include a measure that provides for a verification process over the required automatic generation control, or regulating reserves a balancing authority maintains

Para 418

"Include a measure that provides for a verification process over the required automatic generation control, or regulating reserves a balancing authority maintains"

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10035 - The ERO is directed to consider those (FirstEnergy) suggestions in its Reliability Standards development process.

Para 419

"The ERO is directed to consider those (FirstEnergy) suggestions in its Reliability Standards development process."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

DIRECTIVE: S- Ref 10036 - Add measures concerning the accumulation of large inadvertent interchange balances and levels of non-compliance.

Para 428

"Add measures concerning the accumulation of large inadvertent interchange balances and levels of non-compliance."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10037 - Examine the WECC time error correction procedure as a possible guide..the Commission asks the ERO, when filing the new Reliability Standard, to explain how the new Reliability Standard satisfies the Commissions concerns

Para 438

"Examine the WECC time error correction procedure as a possible guide..the Commission asks the ERO, when filing the new Reliability Standard, to explain how the new Reliability Standard satisfies the Commissions concerns"

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10038 - Regional Differences to BAL-006-1: Inadvertent Interchange Accounting and Financial Inadvertent Settlement: Explore FirstEnergys request to define the function of a waiver in the reliability standard development process.

Para 444

"Regional Differences to BAL-006-1: Inadvertent Interchange Accounting and Financial Inadvertent Settlement: Explore FirstEnergys request to define the function of a waiver in the reliability standard development process."

Assigned: Project 2010-14 - Balancing Authority Reliability-based Controls

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10039 - Consider the need for wider application of the standard. Consider whether separate, less burdensome requirements for smaller entities may be appropriate. Paragraph 458. The Commission acknowledges the concerns of the commenters about the

Para 460

"Consider the need for wider application of the standard. Consider whether separate, less burdensome requirements for smaller entities may be appropriate. Paragraph 458. The Commission acknowledges the concerns of the commenters about the applicability of CIP-001-1 to small entities and has addressed the concerns of small entities generally earlier in this Final Rule. Our approval of the ERO Compliance Registry criteria to determine which users, owners and operators are responsible for compliance addresses the concerns of APPA and others.

459. However, the Commission believes that there are specific reasons for applying this Reliability Standard to such entities, as discussed in the NOPR. APPA indicates that some small LSEs do not own or operate hard assets that are normally thought of as at risk to sabotage. The Commission is concerned that, an adversary might determine that a small LSE is the appropriate target when the adversary aims at a particular population or facility. Or an adversary may target a small user, owner or operator because it may have similar equipment or protections as a larger facility, that is, the adversary may use an attack against a smaller facility as a training exercise. The knowledge of sabotage events that occur at any facility (including small facilities) may be helpful to those facilities that are traditionally considered to be the primary targets of adversaries as well as to all members of the electric sector, the law enforcement community and other critical infrastructures.

460. For these reasons, the Commission remains concerned that a wider application of CIP-001-1 may be appropriate for Bulk-Power System reliability. Balancing these concerns with our earlier discussion of the applicability of Reliability Standards to smaller entities, we will not direct the ERO to make any specific modification to CIP-001-1 to address applicability. However, we direct the ERO, as part of its Work Plan, to consider in the Reliability Standards development process, possible revisions to CIP-001-1 that address our concerns regarding the need for wider application of the Reliability Standard. Further, when addressing such applicability issues, the ERO should consider whether separate, less burdensome requirements for smaller entities may be appropriate to address these concerns."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10045 - Further, in the interim while the matter is being addressed by the Reliability Standards development process, we direct the ERO to provide advice to entities that have concerns about the reporting of particular circumstances as they arise.

Para 461

"Further, in the interim while the matter is being addressed by the Reliability Standards development process, we direct the ERO to provide advice to entities that have concerns about the reporting of particular circumstances as they arise."

Assigned: Project Standards Internal - For directives unrelated to specific standards

DIRECTIVE: S- Ref 10040 - Define sabotage and provide guidance on triggering events that would cause an entity to report an event. Paragraph 461. Several commenters agree with the Commissions concern that the term sabotage should be defined. For the reasons stated

Para 461

"Define sabotage and provide guidance on triggering events that would cause an entity to report an event. Paragraph 461. Several commenters agree with the Commissions concern that the term sabotage should be defined. For the reasons stated in the NOPR, we direct that the ERO further define the term and provide guidance on triggering events that would cause an entity to report an event. However, we disagree with those commenters that suggest the term sabotage is so vague as to justify a delay in approval or the application of monetary penalties. As explained in the NOPR,

we believe that the term sabotage is commonly understood and that common understanding should suffice in most instances"

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10041 - Consider FirstEnergys suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality. Paragraph 451. A number of commenters agree with the Commissions concern that the term sabotage needs to

Para 462

"Consider FirstEnergys suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality. Paragraph 451. A number of commenters agree with the Commissions concern that the term sabotage needs to be better defined and guidance provided on the triggering events that would cause an entity to report an event. FirstEnergy states that this definition should differentiate between cyber and physical sabotage and should exclude unintentional operator error. It advocates a threshold of materiality to exclude acts that do not threaten to reduce the ability to provide service or compromise safety and security. SoCal Edison states that clarification regarding the meaning of sabotage and the triggering event for reporting would be helpful and prevent over-reporting."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10042 - The Commission affirms the NOPR directive and directs the ERO to incorporate a periodic review or updating of the sabotage reporting procedures and for the periodic testing of the sabotage reporting procedures. At this time, the Commission

Para 466

"The Commission affirms the NOPR directive and directs the ERO to incorporate a periodic review or updating of the sabotage reporting procedures and for the periodic testing of the sabotage reporting procedures. At this time, the Commission does not specify a review period as suggested by FirstEnergy and MRO and, rather, believes that the appropriate period should be determined through the EROs Reliability Standards development process. However, the Commission directs that the ERO begin this process by considering a staggered schedule of annual testing of the procedures with modifications made when warranted formal review of the procedures every two or three years."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10043 - Include a requirement to report a sabotage event to the proper government authorities. Develop the language to specifically implement this directive. Paragraph 467. CIP-001-1, Requirement R4, requires that each applicable entity establish

Para 468

"Include a requirement to report a sabotage event to the proper government authorities. Develop the language to specifically implement this directive. Paragraph 467. CIP-001-1, Requirement R4, requires that each applicable entity establish communications contacts, as applicable, with the local FBI or Royal Canadian Mounted Police officials and develop reporting procedures as appropriate to its circumstances. The Commission in the NOPR expressed concern that the Reliability Standard does not require an applicable entity to actually contact the appropriate governmental or regulatory body in the event of sabotage. Therefore, the Commission proposed that NERC modify the Reliability Standard to require an applicable entity to contact appropriate federal authorities, such as the Department of Homeland Security, in the event of sabotage within a specified period of time.212 468. As mentioned above, NERC and others object to the wording of the proposed directive as overly prescriptive and note that the reference to appropriate federal authorities fails to recognize the international application of the Reliability Standard. The example of the Department of Homeland Security as an appropriate federal authority was not intended to be an exclusive designation. Nonetheless, the Commission agrees that a reference to federal

authorities could create confusion. Accordingly, we modify the direction in the NOPR and now direct the ERO to address our underlying concern regarding mandatory reporting of a sabotage event. The EROs Reliability Standards development process should develop the language to implement this directive."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10044 - We direct the ERO to explore ways to address these concerns including central coordination of sabotage reports and a uniform reporting format in developing modifications to the Reliability Standard with the appropriate governmental agenci

Para 469

"We direct the ERO to explore ways to address these concerns including central coordination of sabotage reports and a uniform reporting format in developing modifications to the Reliability Standard with the appropriate governmental agencies that have levied the reporting requirements."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10046 - Modify CIP-001-1 to require an applicable entity to contact appropriate governmental authorities in the event of sabotage within a specific period of time, even if it is a preliminary report.

Para 470

"Modify CIP-001-1 to require an applicable entity to contact appropriate governmental authorities in the event of sabotage within a specific period of time, even if it is a preliminary report."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10047 - Include generator operators and distribution providers in the list of applicable entities and create appropriate requirements for them. Paragraph 487. The Commission reaffirms its position that generator operators and distribution provider

Para 487

"Include generator operators and distribution providers in the list of applicable entities and create appropriate requirements for them. Paragraph 487. The Commission reaffirms its position that generator operators and distribution providers should be included as applicable entities in COM-001-1 to ensure there is no reliability gap during normal and emergency operations. For example, during a blackstart when normal communications may be disrupted, it is essential that the transmission operator, balancing authority and reliability coordinator maintain communications with their distribution providers and generator operators. However, the current version of Reliability Standard COM-001-1 does not require this because it does not include generator operators and distribution providers as applicable entities. We clarify that the NOPR did not propose to require redundancy on generator operators or distribution providers telecommunication facilities or that generator operators or distribution providers be trained on anything not related to their functions during normal and emergency conditions. We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- REf 10048 - Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. TAPS states that Requirement R1.4 has an ambiguous requirement that, if applied to distribution providers and generat

Para 491

"Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. Paragraph 483. TAPS states that Requirement R1.4 has an ambiguous requirement that,

if applied to distribution providers and generator operators, would impose redundancy requirements well beyond what is reasonably necessary for Bulk-Power System reliability. Further it asserts that the NOPR provides no basis for expanding the Reliability Standard to small entities, such as a 2-MW distribution provider or generator, much less than one that has no connection to the bulk transmission system. Finally, TAPS contends that, in making this proposal, the Commission is over-stepping its bounds by not leaving it to the EROs expert judgment whether COM-001-1 has sufficient coverage to protect Bulk-Power System reliability and states that, in any event, applicability should be limited through NERCs registry criteria and definition of bulk electric system."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10049 - Specify requirements for using telecommunication facilities during normal and emergency conditions that reflect the roles of the applicable entities and their impact of reliable operation, and include adequate flexibility. Paragraph 490. I

Para 503

"Specify requirements for using telecommunication facilities during normal and emergency conditions that reflect the roles of the applicable entities and their impact of reliable operation, and include adequate flexibility. Paragraph 490. In response to SDG&E, the Commissions intent is not to subject generator operators and distribution providers to the same requirements placed on transmission operators. As part of the modification of this Reliability Standard or development of a new Reliability Standard to include the appropriate telecommunications facility requirements for generator operators and distribution providers, the ERO should take into account what would be required of generator operators and distribution providers in terms of telecommunications for the Reliable Operation of the Bulk-Power System, instead of applying the same requirements as are placed on other reliability entities such as reliability coordinators, balancing authorities and transmission operators."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10050 - Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. Entergy Paragraph 499. Entergy states that it is unclear what cyber assets are covered by COM-001-0. Entergy believes that the Reliability

Para 503/504

"Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. Entergy Paragraph 499. Entergy states that it is unclear what cyber assets are covered by COM-001-0. Entergy believes that the Reliability Standard should focus on telecommunications that support the operation of critical assets. Entergy also believes that COM-001-0 should be expanded to include advances in communications technology. It states that NERC should consider addressing the following in a way that will facilitate an understanding of the Reliability Standards requirements: (1) voice communications; (2) command and control data communications; (3) security coordination data communications; (4) digital messaging communications; (5) human linguistic convention and (6) other types of communications, including video conferencing and communications with remote security cameras. Entergy believes that this could be accomplished through an enhancement to the definition of communications in the NERC glossary and recasting COM-001-0 to improve the specificity of requirements for each form of communication. Finally,Entergy believes that Requirement R4 of COM-001-0, which requires reliability coordinators, transmission operators and balancing authorities to use English in all types of communications, should apply only to verbal and written communications."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10051 - Although we direct that the regional reliability organization should not be the compliance monitor for NERCNet, we leave it to the ERO to determine whether it is the appropriate compliance monitor or if compliance should be monitored by the

Para 507

"Although we direct that the regional reliability organization should not be the compliance monitor for NERCNet, we leave it to the ERO to determine whether it is the appropriate compliance monitor or if compliance should be monitored by the Regional Entities for NERCNet User Organizations"

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10052 - Include distribution providers in the list of applicable entities.

Para 512

"Include distribution providers in the list of applicable entities."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10053 - Address APPAs concern through the standard development process.

Para 515

"Address APPAs concern through the standard development process."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10054 - Include a requirement for the reliability coordinator to assess and approve only those actions that have impacts beyond the area views of the transmission operators and balancing authorities. Include how to determine whether an action need

Para 520

"Include a requirement for the reliability coordinator to assess and approve only those actions that have impacts beyond the area views of the transmission operators and balancing authorities. Include how to determine whether an action needs to be assessed by the reliability coordinator."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10055 - Consider Xcels suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinators assessment and approval.

Para 523

"Consider Xcels suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinators assessment and approval."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10056 - Establish tightened communication protocols, especially for communications during alerts and emergencies. Establish uniformity to the extent practical on a continent-wide basis.

Para 531

"Establish tightened communication protocols, especially for communications during alerts and emergencies. Establish uniformity to the extent practical on a continent-wide basis."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10058 - Regarding APPAs suggestion that it may be beneficial to include communication protocols in the relevant Reliability Standard that governs those types of emergencies, we direct that it be addressed in the Reliability Standards Development pr

Para 533

"Regarding APPAs suggestion that it may be beneficial to include communication protocols in the relevant Reliability Standard that governs those types of emergencies, we direct that it be addressed in the Reliability Standards Development process."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

DIRECTIVE: S- Ref 10057 - Address Santa Clara, FirstEnergy, and Six Cities concerns in the reliability standards development process.

Para 539

"Address Santa Clara, FirstEnergy, and Six Cities concerns in the reliability standards development process."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

DIRECTIVE: S- Ref 10059 - Include reliability coordinators as an applicable entity.

Para 547

"Include reliability coordinators as an applicable entity."

Assigned: Project 2009-03 - Emergency Operations

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10060 - Consider Southern California Edisons suggestions in the standard development process.

Para 548

"Consider Southern California Edisons and Xcels suggestions in the standard development process."

Assigned: Project 2009-03 - Emergency Operations

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10061 Para 554 . as Xcel recognizes, load shedding is the option of last resort and there may be other options available to alleviate IROL violations within 30 minutes. The ERO should consider these other options as it works through the Reliabili

Para 554

"554.Further, as Xcel recognizes, load shedding is the option of last resort and there may be other options available to alleviate IROL violations within 30 minutes. The ERO should consider these other options as it works through the Reliability Standards development process to modify EOP-001-0."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10062 - Clarify that the 30-minute requirement in requirement R2 to state that load shedding should be capable of being implemented as soon as possible but no more than 30 minutes.

Para 555

"Clarify that the 30-minute requirement in requirement R2 to state that load shedding should be capable of being implemented as soon as possible but no more than 30 minutes."

Assigned: Project 2009-03 - Emergency Operations

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10063 - We direct the ERO to determine the optimum number of continent-wide system states and their attributes and to modify the Reliability Standards through the Reliability Standards development process to accomplish this objective.

Para 561

"We direct the ERO to determine the optimum number of continent-wide system states and their attributes and to modify the Reliability Standards through the Reliability Standards development process to accomplish this objective."

Assigned: Project 2009-03 - Emergency Operations

Status: In Drafting

DIRECTIVE: S- Ref 10064 - Consider a pilot program (field test) for the system states proposal.

Para 562

"Consider a pilot program (field test) for the system states proposal."

Assigned: Project 2009-03 - Emergency Operations

Status: In Drafting

DIRECTIVE: S- Ref 10065 - Clarifies that the actual emergency plan elements, and not the for consideration elements of Attachment 1, should be the basis for compliance.

Para 565

"Clarifies that the actual emergency plan elements, and not the for consideration elements of Attachment 1, should be the basis for compliance."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10066 - Address emergencies resulting not only from insufficient generation but also insufficient transmission capability, particularly as it affects the implement of the capacity and energy emergency plan.

Para 571

"Address emergencies resulting not only from insufficient generation but also insufficient transmission capability, particularly as it affects the implement of the capacity and energy emergency plan."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10067 - Include all technically feasible resource options, including demand response and generation resources

Para 573

"Include all technically feasible resource options, including demand response and generation resources"

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10068 - Ensure the TLR procedure is not used to mitigate actual IROL violations.

Para 577

"Ensure the TLR procedure is not used to mitigate actual IROL violations."

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10070 - The Commission directs that the ERO to consider adding Measures and Levels of Non-compliance in the Reliability Standard.

Para 582

"The Commission directs that the ERO to consider adding Measures and Levels of Non-compliance in the Reliability Standard."

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10069 - The issues raised by ISO-NE should be addressed through the Reliability Standards development process.

Para 582

"The issues raised by ISO-NE should be addressed through the Reliability Standards development process."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10072 - Develop specific minimum load shedding capability that should be provided .. based on overarching nationwide criteria that take into account system characteristics.

Para 595

"Develop specific minimum load shedding capability that should be provided … based on overarching nationwide criteria that take into account system characteristics."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10073 - Require periodic drills of simulated load shedding.

Para 597

"Require periodic drills of simulated load shedding."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10074 - Consider comments from APPA in the standards development process.

Para 601

"Consider comments from APPA in the standards development process."

Assigned: Project 2009-03 - Emergency Operations

DIRECTIVE: S- Ref 10076 - Consider APPAs concern about generator operators and LSEs analyzing performance of their equipment and provide data and information on the equipment to assist others with analysis. Paragraph 607. APPA is concerned about the scope of Requir

Para 612

"Consider APPAs concern about generator operators and LSEs analyzing performance of their equipment and provide data and information on the equipment to assist others with analysis. Paragraph 607. APPA is concerned about the scope of Requirement R2 because, in its opinion, Requirement R2 appears to impose an open-ended obligation on entities such as generation operators and LSEs that may have neither the data nor the tools to promptly analyze disturbances that could have originated elsewhere. APPA proposes that Requirement R2 be modified to require affected entities to promptly begin analyses to ensure timely reporting to NERC and DOE."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10077 - The Commission directs the ERO to consider all comments (Xcel) in future modifications of the Reliability Standard through the Reliability Standards development process.

Para 615

"The Commission directs the ERO to consider all comments (Xcel) in future modifications of the Reliability Standard through the Reliability Standards development process."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10078 - The ERO should consider this issue (APPA) through the Reliability Standards development process

Para 616

"The ERO should consider this issue (APPA) through the Reliability Standards development process"

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10079 - Para 617 .... the Commission directs the ERO to develop a modification to EOP-004-1 through the Reliability Standards development process that includes any Requirements necessary for users, owners and operators of the Bulk-Power System to

"617.While the Commission has identified concerns with regard to EOP-004-1, we believe that the proposal serves an important purpose in establishing requirements for reporting and analysis of system disturbances. Accordingly, the Commission approves Reliability Standard EOP-004-1 as mandatory and enforceable. In addition, pursuant to section 215(d)(5) of the FPA and 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to EOP-004-1 through the Reliability Standards development process that includes any Requirements necessary for users, owners and operators of the Bulk-Power System to provide data that will assist NERC in the investigation of a blackout or disturbance."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10075 - Paragraph 618. requirement R3 addresses the reporting of disturbances to the regional reliability organizations and NERC. The Commission directs the ERO to change its Rules of Procedure to assure that the Commission also receives these repo

"Paragraph 618. requirement R3 addresses the reporting of disturbances to the regional reliability organizations and NERC. The Commission directs the ERO to change its Rules of Procedure to assure that the Commission also receives these reports within the same time frames as DOE."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10082 - Consider commenters concerns in future modifications of the reliability standard, including those that refer to Attachment 1.

Para 628

"Consider commenters concerns in future modifications of the reliability standard, including those that refer to Attachment 1."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10083 - Directs the ERO to consider the issues raised by NRC in future revisions of the Reliability Standard through the Reliability Standard development process.

Para 629

"Directs the ERO to consider the issues raised by NRC in future revisions of the Reliability Standard through the Reliability Standard development process."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10081 - NERC shall gather data from simulations and drills of system restoration on the time it takes to restore power to the auxiliary power systems of nuclear power plants under its data gathering authority and report the information to the Commi

Para 629

"NERC shall gather data from simulations and drills of system restoration on the time it takes to restore power to the auxiliary power systems of nuclear power plants under its data gathering authority and report the information to the Commission on a quarterly basis."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10080 - Identify time frames for training and review of restoration plan requirements to simulate contingencies and prepare operators for anticipated and unforeseen events.

Para 630

"Identify time frames for training and review of restoration plan requirements to simulate contingencies and prepare operators for anticipated and unforeseen events."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10084 - Para 632 - Ensure the reliability coordinator is involved in the development and approval of system restoration plans.

"632 - Ensure the reliability coordinator is involved in the development and approval of system restoration plans."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10086 - With regard to TANCs request for regional flexibility in determining the appropriate mix of facilities needed to achieve the reliability objectives, it is our understanding that the Reliability Standard provides for the number and location

Para 646

"With regard to TANCs request for regional flexibility in determining the appropriate mix of facilities needed to achieve the reliability objectives, it is our understanding that the Reliability Standard provides for the number and location of blackstart units to vary depending on the specific requirements of each system. We believe that uniformity will be required, however, in the criteria used to determine the number and location of blackstart units and testing requirements"

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10085 - Para's 642 & 643 - EEI suggests that EOP-007-0 be rewritten so that compliance obligations are assigned directly to those entities that provide the data and other information. FirstEnergy and MRO state that the reliability coordinator, not

Para 647

"642 & 643 - EEI suggests that EOP-007-0 be rewritten so that compliance obligations are assigned directly to those entities that provide the data and other information. FirstEnergy and MRO state that the reliability coordinator, not the Regional Entity, should be responsible for the regional blackstart plan for its area of responsibility."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10092 - Para 672 - Provide for backup capabilities that, at a minimum, must require transmission operators and balancing authorities that have operational control over significant portions of generation and load to have minimum backup capabilities

"672 - Provide for backup capabilities that, at a minimum, must require transmission operators and balancing authorities that have operational control over significant portions of generation and load to have minimum backup capabilities discussed above but may do so through contracting for these services instead of through dedicated backup control centers."

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10093 - Provide for backup capabilities that, at a minimum, must be independent of the primary control center

Para 663

"Provide for backup capabilities that, at a minimum, must be independent of the primary control center"

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10090 - Para 651 - Provide for backup capabilities that, at a minimum, must provide for a minimum functionality to replicate the critical reliability functions of the primary control center.

"651 - Provide for backup capabilities that, at a minimum, must provide for a minimum functionality to replicate the critical reliability functions of the primary control center."

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10088 - Para 651 - Provide for backup capabilities that, at a minimum, must be capable of operating for a prolonged period of time, generally defined by the time it takes to restore the primary control center.

"651 - Provide for backup capabilities that, at a minimum, must be capable of operating for a prolonged period of time, generally defined by the time it takes to restore the primary control center."

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10089 - Para 672 - Provide for backup capabilities that, at a minimum, must include a requirement that all reliability coordinators have full backup control centers

Para 670

"672 - Provide for backup capabilities that, at a minimum, must include a requirement that all reliability coordinators have full backup control centers"

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10087 - Include large, centrally dispatched generation control centers.

Para 670

"Include large, centrally dispatched generation control centers."

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10091 - Provide for backup capabilities that, at a minimum, must provide that the extent of the backup capability be consistent with the impact of the loss of the entitys primary control center on the reliability of the bulk power system.

Para 672

"Provide for backup capabilities that, at a minimum, must provide that the extent of the backup capability be consistent with the impact of the loss of the entitys primary control center on the reliability of the bulk power system."

Assigned: Project 2006-04 - Backup Facilities

Status: Regulator Approved Delivery: 2011

DIRECTIVE: S- Ref 10094 - Consider suggestions for improvements in future revisions of the standards.

Para 676

"Consider suggestions for improvements in future revisions of the standards."

Assigned: Project 2006-03 - System Restoration and Blackstart

Status: Regulator Approved Delivery: 2009

DIRECTIVE: S- Ref 10097 - Address other commenters concerns in future revisions to the standard.

Para 687

"Address other commenters concerns in future revisions to the standard."

Not assigned to any project.

DIRECTIVE: S- Ref 10095 - Consider FirstEnergys suggestion to include a reference to TPL-004-0.

Para 692

"Consider FirstEnergys suggestion to include a reference to TPL-004-0."

Not assigned to any project.

DIRECTIVE: S- Ref 10096 - Amend requirement R1.4 to require evaluation of system performance under both normal and contingency conditions by referencing TPL-001 through TPL-003.

Para 693

"Amend requirement R1.4 to require evaluation of system performance under both normal and contingency conditions by referencing TPL-001 through TPL-003."

Assigned: Project 2010-12 - Order 693 Directives

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10098 - Address the issue of bright-line applicability of 200 kV and above through the standards development process.

Para 706

"Address the issue of bright-line applicability of 200 kV and above through the standards development process."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10099 - Incorporate suggestions to include facilities at lower voltages that are associated with IROLs.

Para 706

"Incorporate suggestions to include facilities at lower voltages that are associated with IROLs."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10102 - We recognize that many commenter's would like a more precise definition for the applicability of this Reliability Standard, and we direct the ERO to develop an acceptable definition that covers facilities that impact reliability but balance

Para 708

"We recognize that many commenter's would like a more precise definition for the applicability of this Reliability Standard, and we direct the ERO to develop an acceptable definition that covers facilities that impact reliability but balances extending the applicability of this standard against unreasonably increasing the burden on transmission owners"

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10103 - FirstEnergy and Xcel suggest that if the applicability of this Reliability Standard is expanded, the Commission should allow flexibility in complying with this Reliability Standard for lower-voltage facilities, or allow lower-voltage facili

Para 709

"FirstEnergy and Xcel suggest that if the applicability of this Reliability Standard is expanded, the Commission should allow flexibility in complying with this Reliability Standard for lower-voltage facilities, or allow lower-voltage facilities one year before the Reliability Standard is implemented. The ERO should consider these comments when determining when it would request that the modification of this Reliability Standard to go into effect …"

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10104 - Accordingly, the Commission directs the ERO to develop compliance audit procedures, using relevant industry experts, which would identify appropriate inspection cycles based on local factors. These inspection cycles are to be used in compl

Para 721

"Accordingly, the Commission directs the ERO to develop compliance audit procedures, using relevant industry experts, which would identify appropriate inspection cycles based on local factors. These inspection cycles are to be used in compliance auditing of FAC-003-1 by the ERO or Regional Entity to ensure such inspection cycles and vegetation management requirements are properly met by the responsible entities."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10101 - Collect outage data for transmission outages of lines that cross both federal and non-federal lands, analyze it, and use the results to develop a standard that would apply to both federal and non-federal lands.

Para 732

"Collect outage data for transmission outages of lines that cross both federal and non-federal lands, analyze it, and use the results to develop a standard that would apply to both federal and non-federal lands."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10100 - Define the minimum clearance needed to avoid sustained vegetation-related outages that apply to line crossing federal and non-federal lands.

Para 732

"Define the minimum clearance needed to avoid sustained vegetation-related outages that apply to line crossing federal and non-federal lands."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10105 - FirstEnergy suggests that rights-of-way be defined to encompass the required clearance areas instead of the corresponding legal rights, and that the standards should not require clearing the entire right-of-way when the required clearance f

Para 734

"FirstEnergy suggests that rights-of-way be defined to encompass the required clearance areas instead of the corresponding legal rights, and that the standards should not require clearing the entire right-of-way when the required clearance for an existing line does not take up the entire right-of-way. The Commission believes this suggestion is reasonable and should be addressed by the ERO. Accordingly, the Commission directs the ERO to address this suggestion in the Reliability Standards development process."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10107 - Require transmission and generator facility owners to document underlying assumptions and methods used to determine normal and emergency facility ratings.

Para 739

"Require transmission and generator facility owners to document underlying assumptions and methods used to determine normal and emergency facility ratings."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10106 - Consider EEIs suggestion for having this information available for review upon request of a registered user, owner, and operator as part of the standards development process.

Para 739

"Consider EEIs suggestion for having this information available for review upon request of a registered user, owner, and operator as part of the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10108 - Ensure that the methodology chosen is consistent with standards developed in an open process like IEEE or CIGRE.

Para 742

"Ensure that the methodology chosen is consistent with standards developed in an open process like IEEE or CIGRE."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10109 - Identify and document the limiting component for all facilities and the increase in rating if that component were no longer the limiting component, i.e. the rating for the second-most limiting component, for facilities associated with an IR

Para 756

"Identify and document the limiting component for all facilities and the increase in rating if that component were no longer the limiting component, i.e. the rating for the second-most limiting component, for facilities associated with an IROL, a limitation of TTC, an impediment to generator deliverability, or an impediment to service in major cities or load pockets."

Assigned: Project 2006-09 - Facility Ratings

Status: In Drafting

DIRECTIVE: S- Ref 10110 - Consider International Transmissions comments regarding applying this directive only for lines where the conductor itself is not the limiting element as part of the standards development process.

Para 760

"Consider International Transmissions comments regarding applying this directive only for lines where the conductor itself is not the limiting element as part of the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10111 - Consider comments from FirstEnergy and MISO that generators will have difficulty determining the increase in ratings due to the next limiting element through the standards development process.

Para 760

"Consider comments from FirstEnergy and MISO that generators will have difficulty determining the increase in ratings due to the next limiting element through the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10112 - Consider Xcels comments that an actual test be used by generator operators to determine capabilities as part of the standards development process.

Para 765

"Consider Xcels comments that an actual test be used by generator operators to determine capabilities as part of the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10113 - Consider FirstEnergys comments that compliance with NRC rating methodologies should be assumed to comply with NERC reliability standards as part of the standards development process.

Para 765

"Consider FirstEnergys comments that compliance with NRC rating methodologies should be assumed to comply with NERC reliability standards as part of the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10114 - Consider the comments by the Valley Group regarding dynamic line ratings as part of the standards development process.

Para 768

"Consider the comments by the Valley Group regarding dynamic line ratings as part of the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10115 - Add or update the compliance measures in the standard as part of the standards development process.

Para 770

"Add or update the compliance measures in the standard as part of the standards development process."

Assigned: Project 2006-09 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10116 - Should provide a framework for transfer capability calculation methodology, including data inputs and modeling assumptions.

Para 779

"Should provide a framework for transfer capability calculation methodology, including data inputs and modeling assumptions."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10117 - Should be an umbrella organization within the Eastern Interconnection and others to assure consistency. This is best done by NERC as the ERO.

Para 779

"Should be an umbrella organization within the Eastern Interconnection and others to assure consistency. This is best done by NERC as the ERO."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10118 - Process used to determine transfer capabilities should be transparent to the stakeholders. The results of those calculations should be available to qualified entities on a confidential basis.

Para 782

"Process used to determine transfer capabilities should be transparent to the stakeholders. The results of those calculations should be available to qualified entities on a confidential basis."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10119 - The process and criteria used to determine transfer capabilities for use in calculating ATC must be identical to those used in planning and operating the system.

Para 782

"The process and criteria used to determine transfer capabilities for use in calculating ATC must be identical to those used in planning and operating the system."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10124 - Make the standard applicable to reliability coordinators.

Para 790

"Make the standard applicable to reliability coordinators."

Assigned: Project 2006-07 - ATC-TTC-CBM-TRM

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10132 - Include a requirement that interchange information must be submitted for all point-to-point transfers entirely within a balancing authority area, including all grandfathered and non-Order No. 888 transfers.

Para 817

"Include a requirement that interchange information must be submitted for all point-to-point transfers entirely within a balancing authority area, including all grandfathered and non-Order No. 888 transfers."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10133 - Consider Santa Claras comments about the applicability of the LSE in the standard as part of the standards development process. Santa Clara submits that LSEs should be applicable entities under proposed revised INT-001-2 to ensure that the

Para 819

"Consider Santa Claras comments about the applicability of the LSE in the standard as part of the standards development process. Santa Clara submits that LSEs should be applicable entities under proposed revised INT-001-2 to ensure that they have adequate notice of the requirements of this Reliability Standard. It states that the actions of LSEs are implicated in Requirement R1 of this proposed Reliability Standard."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10131 - Regional Difference to INT-001/4: WECC Tagging Dynamic Schedules and Inadvertent Payback: Submit a filing within 90 days of the Order that provides the needed information or withdraws the regional variance.

Para 825

"Regional Difference to INT-001/4: WECC Tagging Dynamic Schedules and Inadvertent Payback: Submit a filing within 90 days of the Order that provides the needed information or withdraws the regional variance."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: Filed Delivery: 2007

DIRECTIVE: S- Ref 10134 - Consider adding levels of non-compliance to the standard.

Para 843

"Consider adding levels of non-compliance to the standard."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10135 - Consider adding levels of non-compliance to the standard.

Para 848

"Consider adding levels of non-compliance to the standard."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10136 - Include reliability coordinators and transmission operators as applicable entities.

Para 866

"Include reliability coordinators and transmission operators as applicable entities."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10137 - Require reliability coordinators and transmission operators to review energy interchange transactions from the wide-area and local area reliability viewpoints respectively and, where their review indicates a potential detrimental reliabilit

Para 866

"Require reliability coordinators and transmission operators to review energy interchange transactions from the wide-area and local area reliability viewpoints respectively and, where their review indicates a potential detrimental reliability impact, communicate to the sink balancing authorities necessary transaction modifications before implementation."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10138 - Consider the suggestions made by EEI and TVA and address questions raised by Entergy and Northern Indiana as part of the standard development process. EEI states that the wide-area reliability impact review envisioned by the Commission, w

Para 866

"Consider the suggestions made by EEI and TVA and address questions raised by Entergy and Northern Indiana as part of the standard development process.

EEI states that the wide-area reliability impact review envisioned by the Commission, which involves review of the composite energy interchange transactions,probably already takes place under Reliability Standards INT-005 through INT-009 in a cost-effective manner. EEI explains that since most transactions submitted by wholesale

markets to the transactions tagging process span multiple hours with varying sizes (in MW), and are often submitted days before transaction start times, the wide-area review consists of ensuring that sufficient generator ramping capability exists, as well as examining for limits on transfer capabilities. This review is generally considered sufficient to the extent that analyses are taking place on the basis of projected system conditions. EEI suggests that the Commission-proposed review and validation of composite energy interchange transactions by reliability coordinators might be more effectively addressed through near real-time system review. It explains that, at this time, the broad range of system condition parameters is better known, and the reliability coordinators can make use of the TLR process to maintain system reliability.

TVA suggests that the term composite Tag should be defined as part of the proposed modifications. CAISO also questions the meaning of composite Tag and seeks clarification on that issue. TVA notes that depending on the type of reliability analysis required to validate a composite Tag, it may prove impractical to conduct this evaluation for hourly transactions.

Entergy disagrees with the Commissions proposed modifications. It contends that they will require substantial changes to the tagging specifications. Entergy believes that the Commissions concerns may already be addressed by Reliability Standards INT- 005 through INT-009.

Northern Indiana contends that the NOPRs discussion of INT-006-1 is unclear and confusing. It states that it does not understand what the Commission means by validate when the Commission proposes that reliability coordinators and transmission operators review and validate composite arranged interchanges. Northern Indiana also questions whether both reliability coordinators and transmission operators would be required to validate and approve the Tags and what the basis for

approval would be. It questions what falls within the term potential detrimental reliability impact, what happens if a Tag is not validated within 20 minutes to the hour, and whether all schedules are canceled outright or passively approved."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10139 - Consider APPAs suggestion to clarify what reliability entity the standard applies as part of the standard development process.

Para 872

"Consider APPAs suggestion to clarify what reliability entity the standard applies as part of the standard development process."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10140 - Consider APPAs suggestion to clarify what reliability entity the standard applies as part of the standard development process.

Para 875

"Consider APPAs suggestion to clarify what reliability entity the standard applies as part of the standard development process."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10141 - Consider Northern Indianas and ISO-NEs suggestions in the standards development process.

Para 887

"Consider Northern Indianas and ISO-NEs suggestions in the standards development process."

Assigned: Project 2008-12 - Coordinate Interchange Standards

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10142 - Eliminate the references to the regional reliability organization as an applicable entity. Paragraph 896. In the NOPR, the Commission proposed to approve the Reliability Standard as mandatory and enforceable. In addition, as a separate act

Para 896

"Eliminate the references to the regional reliability organization as an applicable entity. Paragraph 896. In the NOPR, the Commission proposed to approve the Reliability Standard as mandatory and enforceable. In addition, as a separate action under section 215(d)(5), the NOPR proposed to direct the ERO to develop modifications to Requirement R1291 to substitute Regional Entity for regional reliability organization and reflect NERCs Rules of Procedure for registering, certifying and verifying entities, including reliability coordinators. Commenters do not raise any concerns regarding the proposed action. Accordingly, for the reasons stated in the NOPR, the Commission approves IRO-001-1 as mandatory and enforceable. In addition, for the reasons discussed in the NOPR, the Commission directs the ERO to develop modifications to the Reliability Standard through the Reliability Standards development process that reflect the process set forth in the NERC Rules of Procedures and eliminate the regional reliability organization as an applicable entity."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10144 - Consider commenters suggestions as part of the standards development process. 893. FirstEnergy suggests that NERC clarify whether Requirement R8, which requires entities to comply with a reliability coordinator directive unless such action

Para 897

"Consider commenters suggestions as part of the standards development process. 893. FirstEnergy suggests that NERC clarify whether Requirement R8, which requires entities to comply with a reliability coordinator directive unless such actions would violate safety, equipment or regulatory or statutory requirements, refers to personnel safety, equipment safety or both. In addition, it suggests the establishment of a chain of command so that, for example, if a generator receives conflicting instructions from a balancing authority and a transmission operator, it can determine which instruction governs.

Consider commenters suggestions as part of the standards development process. Paragraph 892. APPA supports the approval of the Reliability Standard but expresses concern that the Version 1 standard does not include Measures that correspond to Requirements R2 and R9. APPA emphasizes the need for Measures corresponding to Requirement R9, which requires the reliability coordinator to act in the interests of reliability for the overall reliability coordinator area and the Interconnection before the interests of any other entity. APPA supports Requirement R8 with the extended applicability, provided that applicability is determined by reference to the NERC compliance registry. APPA agrees that the regional reliability organization should be eliminated as an applicable entity and suggests it be replaced with Regional Entities.

894. Requirement R3 provides that a reliability coordinator shall have clear decisionmaking authority to act and direct actions to be taken by applicable entities to preserve the integrity and reliability of the Bulk Electric System and these actions shall be taken without delay but no longer than 30 minutes. Santa Clara contends that some actions would require driving to a remote site and therefore, mandating completion of the required action within 30 minutes would be unreasonable. Thus, it recommends that NERC modify Requirement R3 to provide that actions shall commence without delay, but in any event shall commence within 30 minutes.

895. California Cogeneration comments that the Reliability Standard fails to address the operational limitations of QFs because they have contractual obligations to provide thermal energy to their industrial hosts. It contends that a QF can be directed to change operations only in the case of a system emergency, pursuant to 18 CFR 292.307."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10143 - Consider adding measures and levels of non-compliance. . Further, the Commission directs the ERO to consider adding Measures and Levels of Non-Compliance in the Reliability Standard as requested by APPA.

Para 897

"Consider adding measures and levels of non-compliance … Further, the Commission directs the ERO to consider adding Measures and Levels of Non-Compliance in the Reliability Standard as requested by APPA."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10145 - Require a minimum set of tools for the RC

Para 905

"Further, consistent with the NOPR, the Commission directs the ERO to modify IRO-002-1 to require a minimum set of tools that must be made available to the reliability coordinator. We believe that this requirement will ensure that a reliability coordinator has the tools it needs to perform its functions. Further, as noted by Dominion, such a requirement promotes a more proactive approach to maintaining reliability."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10147 - Consider the suggestions of APPA, Entergy, and Xcel when doing so.

Para 914

"<From 693> Consider the suggestions of APPA, Entergy, and Xcel when doing so."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10146 - Create criteria to define the term critical facilities in a reliability coordinators area and its adjacent systems.

Para 914

"<From 693> Create criteria to define the term critical facilities in a reliability coordinators area and its adjacent systems."

Assigned: Project 2006-06 - Reliability Coordination

Status: Pending

DIRECTIVE: S- Ref 10149 - In response to APPAs concern that NERC did not provide a Measure for each Requirement, we reiterate that it is in the EROs discretion whether each Requirement requires a corresponding Measure. The ERO should consider this issue through the

Para 934

"In response to APPAs concern that NERC did not provide a Measure for each Requirement, we reiterate that it is in the EROs discretion whether each Requirement requires a corresponding Measure. The ERO should consider this issue through the Reliability Standards development process"

Not assigned to any project.

DIRECTIVE: S- Ref 10148 - Para 935 .... we direct the ERO to modify IRO-004-1 through the Reliability Standards development process to require the next-day analysis to identify control actions that can be implemented and effective within 30 minutes after a contingen

Para 935

"935. Accordingly, we approve Reliability Standard IRO-004-1 as mandatory and enforceable. Further, we direct the ERO to modify IRO-004-1 through the Reliability Standards development process to require the next-day analysis to identify control actions that can be implemented and effective within 30 minutes after a contingency. The Commission also directs the ERO to consider adding Measures and Levels of Non-Compliance to the Reliability Standard as requested by APPA."

Assigned: Project 2009-02 - Real Time Reliability Monitoring and Analysis Capabilities

DIRECTIVE: S- Ref 10150 - Provide further clarification that reliability coordinators and transmission operators direct control actions, not LSEs as part of the standard development process. Paragraph 950. We do not share TAPS concern regarding LSEs initiating load

Para 950

"Provide further clarification that reliability coordinators and transmission operators direct control actions, not LSEs as part of the standard development process. Paragraph 950. We do not share TAPS concern regarding LSEs initiating load shedding as their own control action to respect IROLs or SOLs. The appropriate control actions to respect IROLs and SOLs are the responsibilities of a reliability coordinator and transmission operator. If load shedding is required, it is the responsibility of a reliability coordinator or a transmission operator to direct the appropriate entities including LSEs to carry it out. However, we urge the ERO to provide further clarification in this regard and include TAPS concern in developing the modification of this Reliability Standard."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10153 - Conduct a survey on IROL practices and actual operating experiences by requiring reliability coordinators to report any violations of IROLS, their causes, the date and time, the durations and magnitudes in which actual operations exceeds IR

Para 951

"Conduct a survey on IROL practices and actual operating experiences by requiring reliability coordinators to report any violations of IROLS, their causes, the date and time, the durations and magnitudes in which actual operations exceeds IROLs to NERC."

Assigned: Project 2006-06 - Reliability Coordination

Status: Filed Delivery: 2007

DIRECTIVE: S- Ref 10152 - Measures and levels of non-compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency, and causes of the violations and whether these occur during normal or contingency conditions. Paragraph 951. Ac

Para 951

"Measures and levels of non-compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency, and causes of the violations and whether these occur during normal or contingency conditions. Paragraph 951. Accordingly, the Commission approves Reliability Standard IRO-005-1 asmandatory and enforceable. Further, because IRO-005-1 has no Measures or Levels ofNon-Compliance, pursuant to section 215(d)(5) of the FPA and 39.5(f) of ourregulations, the Commission directs the ERO to develop a modification to IRO-005-1through the Reliability Standards development process that includes Measures and Levelsof Non-Compliance. The Commission further directs that the Measures and Levels of Non-Compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency and causes of the violations and whether these occur during normal or contingency conditions."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10151 - Include measures and levels of non-compliance.

Para 951

"Include measures and levels of non-compliance."

Assigned: Project 2006-06 - Reliability Coordination

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10154 - Include a clear warning that TLR procedures are not appropriate and not effective to mitigate an actual IROL violation.

Para 961

"Include a clear warning that TLR procedures are not appropriate and not effective to mitigate an actual IROL violation."

Assigned: Project 2006-08 - Transmission Loading Relief

Status: Filed Delivery: 2007

DIRECTIVE: S- Ref 10155 - Identifies the available alternatives to mitigate an IROL violation other than the use of the TLR procedure.

Para 964

"Identifies the available alternatives to mitigate an IROL violation other than the use of the TLR procedure."

Assigned: Project 2006-08 - Transmission Loading Relief

Status: Filed Delivery: 2007

DIRECTIVE: S- Ref 10156 - Modify the WECC and ERCOT load relief procedures to ensure consistency with the standard form of the reliability standard including requirements, measures, and levels of non-compliance.

Para 964

"Modify the WECC and ERCOT load relief procedures to ensure consistency with the standard form of the reliability standard including requirements, measures, and levels of non-compliance."

Assigned: Project 2006-08 - Transmission Loading Relief

Status: In Drafting

DIRECTIVE: S- Ref 10158 - Consider the suggestions of MidAmerican and Xcel when developing the modification.

Para 964

"Consider the suggestions of MidAmerican and Xcel when developing the modification."

Assigned: Project 2006-08 - Transmission Loading Relief

Status: Filed Delivery: 2007

DIRECTIVE: S- Ref 10157 - Para 992. In addressing MISO-PJMs claim that the ERO should modify IRO-006-3 and the MISO-PJM regional difference to require netting generation-to-load impacts to recognize counterflow, we will let the ERO Operating Subcommittee address the

Para 992

"992. In addressing MISO-PJMs claim that the ERO should modify IRO-006-3 and the MISO-PJM regional difference to require netting generation-to-load impacts to recognize counterflow, we will let the ERO Operating Subcommittee address the technical merits of netting flow impacts in the interchange distribution calculator."

Assigned: Project OC PC SubC - For directives assigned to the Standing Committees

FERC - Order on Violation Risk Factors

Issued 5/18/2007

DIRECTIVE: S-With regard to guidelines (4) and (5), while we accept the Violation Risk Factor assignments at this time, we direct NERC to submit a compliance filing to address the Commissions concerns with regard to the guidelines the Commission applied to each Requ

Para 43

"With regard to guidelines (4) and (5), while we accept the Violation Risk Factor assignments at this time, we direct NERC to submit a compliance filing to address the Commissions concerns with regard to the guidelines the Commission applied to each Requirement listed in Appendix B and to provide justification for NERCs Violation Risk Factor assignment. The Commission may change its determination based on the explanation provided in the compliance filing.

44. In addition to those approved Reliability Standards"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-In addition to those approved Reliability Standards identified by NERC where Requirements, by omission, were not assigned a Violation Risk Factor, the Commission has also identified others. Requirements for Reliability Standards MOD-016-1, R2, R2.1, R3,

Para 44

"In addition to those approved Reliability Standards identified by NERC where Requirements, by omission, were not assigned a Violation Risk Factor, the Commission has also identified others. Requirements for Reliability Standards MOD-016-1, R2, R2.1, R3, and R3.1 were not assigned Violation Risk Factors. The Commission directs NERC to submit these Violation Risk Factor assignments in its compliance filing"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-The Commissions review has also found several instances where Violation Risk Factors were inappropriately assigned. For example, our review found instances where Violation Risk Factors were assigned to explanatory statements, phrases and/or text. We dir

Para 45

"The Commissions review has also found several instances where Violation Risk Factors were inappropriately assigned. For example, our review found instances where Violation Risk Factors were assigned to explanatory statements, phrases and/or text. We direct NERC to remove Violation Risk Factor assignments in these instances in the compliance filing required in 15 days."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct NERC to submit a complete Violation Risk Factor matrix encompassing each Commission-approved Reliability Standard. The matrix should include the correct corresponding version number for each Requirement and its associated Violation Risk Factor.

Para 46

"direct NERC to submit a complete Violation Risk Factor matrix encompassing each Commission-approved Reliability Standard. The matrix should include the correct corresponding version number for each Requirement and its associated Violation Risk Factor."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directing NERC to file modifications to 28 of the proposed Violation Risk Factors within 15 days. This, we are approving as modified the proposed Violation Risk Factors effective June 1, 2007. In addition, the Commission directs NERC to submit a compliance filing within 60 days of this order that explains the rationale for assigning certain risk factor levels in approximately 75 instances.

Para 2

" … we are directing NERC to file modifications to 28 of the proposed Violation Risk Factors within 15 days. Thus, we are approving as modified the proposed Violation Risk Factors effective June 1, 2007. In addition, the Commission directs NERC to submit a compliance filing within 60 days of the date of this order that explains the rationale for assigning certain risk factor levels in approximately 75 instances."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

FERC - Order on Compliance Filing

Issued 6/7/2007

DIRECTIVE: S-directs NERC to make a compliance filing within 30 days of the date of this order.

Para 1

"directs NERC to make a compliance filing within 30 days of the date of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-direct NERC to develop violation severity levels for each requirement and subrequirement of each Reliability Standard, either through the Reliability Standards development process or through another expedited process, and submit them to the Commission b

Para 80

"direct NERC to develop violation severity levels for each requirement and subrequirement of each Reliability Standard, either through the Reliability Standards development process or through another expedited process, and submit them to the Commission by March 1, 2008. Although NERC proposes to develop violation severity levels over the next three years, we cannot accept NERCs proposal. NERC itself admits that the existing levels of non-compliance are not sufficient going forward in an ERO environment. Because of this, we direct NERC to replace

them with violation severity levels at the earliest possible date. We are requiring that violation severity levels be developed and submitted for approval no later than March 1, 2008 so that the Commission can act on them prior to the 2008 summer period."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-NERC shall submit a compliance filing as to the modifications and submissions required in this order within 60 days of the date of its issuance.

Para B

"NERC shall submit a compliance filing as to the modifications and submissions required in this order within 60 days of the date of its issuance."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

FERC - Order Approving Regional Reliability Standards for the Western Interconnection and Directing Modifications

Issued 6/8/2007

DIRECTIVE: S- Ref 10401 - concerned regarding the circumstances under which WECC-TOP-STD-007-0 would be implemented and the amount of time an entity is allowed to be in violation of an IROL without the possibility of being found in non-compliance. Accordingly, the C

Para 108

"concerned regarding the circumstances under which WECC-TOP-STD-007-0 would be implemented and the amount of time an entity is allowed to be in violation of an IROL without the possibility of being found in non-compliance. Accordingly, the Commission directs NERC to submit a filing within 30 days of the date of this order explaining whether Requirement WR1.b is consistent with the second interpretation of IRO-005-1 (two contingencies away from cascading failure)."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10402 - that WECC in developing a permanent, replacement regional Reliability Standard: (1) clarify any inconsistency between the Requirement WR1.b and corresponding Measure WM1; and (2) ensure that the requirements currently set forth in Measures

Para 109

"that WECC in developing a permanent, replacement regional Reliability Standard: (1) clarify any inconsistency between the Requirement WR1.b and corresponding Measure WM1; and (2) ensure that the requirements currently set forth in Measures WM1 are set forth in the Requirements and that corresponding Measures simply quantify the frequency, duration and magnitude of the violations as determined by the Requirements."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10403 - Para 110 . we expect that WECC will address the shortcomings identified by NERC in developing a permanent, replacement regional Reliability Standard.

Para 110

"101.NERC approved WECC-TOP-STD-007-0 with the condition that WECC meet its commitment to address identified shortcomings, including formatting concerns and inconsistency between the NERC and WECC definition of the term disturbance.

110.In addition, we expect that WECC will address the shortcomings identified by NERC in developing a permanent, replacement regional Reliability Standard."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10167 - Para 72. We also expect that WECC, in developing a permanent, replacement regional Reliability Standard, will address the shortcomings identified by NERC. Para 64. NERC approved WECC-IRO-STD-006-0 on the condition that WECC meet its commit

Para 110

"In addition, we expect that WECC will address the shortcomings identified by NERC in developing a permanent, replacement regional Reliability Standard."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10443 - Para 117 . we expect that WECC, in developing a permanent, replacement standard, will address the shortcomings identified by NERC regarding WECC-VAR-STD-002a-1 including to address identified format-related shortcomings.

Para 117

"117.As with the other regional Reliability Standards, we expect that WECC, in developing a permanent, replacement standard, will address the shortcomings identified by NERC regarding WECC-VAR-STD-002a-1.

113.NERC approved WECC-VAR-STD-002a-1 with the condition that WECC meet its commitment to address identified format-related shortcomings."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10444 - Para 123 .... we expect WECC to address the shortcomings identified by NERC when developing a permanent, replacement standard .... including to address identified format-related shortcomings.

Para 123

"123.We reject Xcels protest since the term power system stabilizer is generally understood as described above, and Xcel has not provided any explanation why the regional Reliability Standard is deficient without a formal definition. Finally, as with the other regional standards, we expect WECC to address the shortcomings identified by NERC when developing a permanent, replacement standard.

119.NERC approved WECC-VAR-STD-002b-1 and identified several format-related shortcomings for WECC to address."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10018 - Para 54. The Commission agrees with the shortcomings identified by NERC regarding WECC-BAL-STD-002-0 and expects WECC in developing a permanent, replacement standard to address these shortcomings as it has committed to do.

Para 54

"54.The Commission agrees with the shortcomings identified by NERC regarding WECC-BAL-STD-002-0 and expects WECC in developing a permanent, replacement standard to address these shortcomings as it has committed to do. For example, for each of the proposed regional Reliability Standards, (1) regional definitions should conform to the definitions set forth in the NERC glossary, unless a specific deviation has been justified; and (2) documents that are referenced in the Reliability Standard should be attached to the Reliability Standard. Likewise, with respect to this and each of the proposed regional Reliability Standards, we agree with NERC that WECC must remove the sanctions table that is inconsistent with NERCs Sanction Guidelines and develop Violation Risk Factors (levels of non-compliance) and Violation Severity Levels that conform to corresponding NERC standards. In approving NERCs Sanction Guidelines, the

Commission emphasized the need to achieve consistency in the assessment of penalties across the regions. Elimination of the WECC sanctions table will further this goal."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10019 - Para 55. Further, it is important that regional Reliability Standards and NERC Reliability Standards achieve a reasonable level of consistency in the structure of a Reliability Standard so that there is a common understanding of the element

Para 55

"55.Further, it is important that regional Reliability Standards and NERC Reliability Standards achieve a reasonable level of consistency in the structure of a Reliability Standard so that there is a common understanding of the elements. In particular, we agree with NERC that WECC should eliminate the excuse of performance provision of the regional Reliability Standards, which is inconsistent with NERCs format. While the factors identified in the excuse of performance provision may be legitimate mitigating factors for WECC to consider when assessing a penalty on a case-by-case basis, the Commission disagrees that a Reliability Standard should contain a blanket waiver or excuse for non-compliance. We expect WECC, in developing a permanent, replacement standard, to address these concerns of both NERC and the Commission. In general, with respect to both the eight proposed Reliability Standards as well as other standards that are being developed by WECC, it is essential that WECC employ a higher level of precision and consistency."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10020 - Para 56 .... Xcel and California Cogeneration contend that the Commission should remand WECC-BAL-STD-002-0 because of ambiguities in the terms load responsibility and firm transaction. ..... as WECC indicated in its response to stakeholder

Para 56

"56.In Order No. 672, the Commission, in discussing the factors it would consider in determining whether a proposed Reliability Standard met the statutory standard for approval, explained that a proposed Reliability Standard should be clear and unambiguous regarding what is required and who is required to comply. Xcel and California Cogeneration contend that the Commission should remand WECC-BAL-STD-002-0 because of ambiguities in the terms load responsibility and firm transaction. As discussed above, the Commission believes that the regional Reliability Standard is sound, as it provides greater stringency than NERCs reserve requirements and meets a need of the Western Interconnection. While commenters identify potential ambiguities, we do not believe that these potential uncertainties demonstrate a degree of ambiguity within the regional Reliability Standard that requires us to remand it. Rather, as WECC indicated in its response to stakeholders in the regional Reliability Standards development process, WECC will provide an opportunity to address these concerns when developing a permanent, replacement standard. The Commission agrees that this is a reasonable approach and will expect WECCs submission of a replacement standard to adequately address these stakeholder concerns."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10165 - direct that WECC in developing a permanent, replacement Reliability Standard, clarify the term receiver and the applicability of the standard.

Para 70

"direct that WECC in developing a permanent, replacement Reliability Standard, clarify the term receiver and the applicability of the standard."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10166 - PPLs contention that LSEs may not be able to meet the Requirements of the regional Reliability Standard. While we are approving WECC-IRO-STD-006 as mandatory and enforceable, we direct WECC to address PPLs concerns in developing a permanent

Para 71

"PPLs contention that LSEs may not be able to meet the Requirements of the regional Reliability Standard. While we are approving WECC-IRO-STD-006 as mandatory and enforceable, we direct WECC to address PPLs concerns in developing a permanent, replacement regional Reliability Standard"

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10347 - In addition, we expect that WECC will address the shortcomings identified by NERC in developing a permanent, replacement regional Reliability Standard.

Para 78

"78.The Commission approves WECC-PRC-STD-001-1 as mandatory and enforceable in the Western Interconnection. The Commission expects WECC, in developing replacement standards, to address the shortcomings identified by NERC.

75.NERC approved WECC-PRC-STD-001-1 with the condition that WECC meet its commitment to address the shortcomings identified by NERC in a January 9, 2007 letter to WECC, including several formatting concerns."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10348 - Para 89. The Commission agrees with the shortcomings identified by NERC regarding WECC-PRC-STD-003-1 and expects WECC in developing a permanent, replacement standard to address these shortcomings as it has committed to do.

Para 89

"89.The Commission agrees with the shortcomings identified by NERC regarding WECC-PRC-STD-003-1 and expects WECC in developing a permanent, replacement standard to address these shortcomings as it has committed to do. In particular, we believe that regional definitions should conform to the definitions set forth in the NERC glossary unless a specific deviation has been justified. Likewise, each Requirement should have a corresponding Measure and, in this case, vice versa."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

DIRECTIVE: S- Ref 10354 - Para 98. The Commission agrees with NERCs concerns regarding the format and content of WECC-PRC-STD-005-1 and expects WECC, in developing a permanent, replacement standard, to address these concerns, including but not limited to inclusion o

Para 98

"98.The Commission agrees with NERCs concerns regarding the format and content of WECC-PRC-STD-005-1 and expects WECC, in developing a permanent, replacement standard, to address these concerns, including but not limited to inclusion of all relevant documents."

Assigned: Project Regional - For directives assigned to regions

Status: Pending Delivery: 2009

FERC - Mandatory Reliability Standards for the Bulk-Power System (Order 693-A)

Issued 7/19/2007

DIRECTIVE: S-While the Commission will not enforce compliance with PRC-006-0, the possible reduction in the amount of load available for underfrequency load shedding can negatively impact the Reliable Operation of the Bulk-Power System. Because of the importance of

Para 145

"While the Commission will not enforce compliance with PRC-006-0, the possible reduction in the amount of load available for underfrequency load shedding can negatively impact the Reliable Operation of the Bulk-Power System. Because of the importance of the UFLS programs and the fact that there currently are no Commission-approved Reliability Standards by which to judge individual UFLS programs, the Commission believes it is important to monitor the current UFLS programs so that we can consider if they provide an adequate safety net for the Bulk-Power System. Therefore, the Commission directs the ERO to collect the frequency and magnitude of load in UFLS systems from applicable entities for this summer, from date of order through September 30, 2007, and perform an analysis as to the ability of the existing system to provide the required last resort function within 90 days of this order. This analysis should consider if the existing UFLS plans together provide an adequate safety net for the Bulk-Power System."

Not assigned to any project.

DIRECTIVE: S-reiterates its direction in Order No. 693 that the goal of this Reliability Standard is to provide the continuation of Reliable Operation and the maintenance of situational awareness in the event that the primary control center is no longer operational.

Para 93

"reiterates its direction in Order No. 693 that the goal of this Reliability Standard is to provide the continuation of Reliable Operation and the maintenance of situational awareness in the event that the primary control center is no longer operational. To that end, every registered reliability coordinator, balancing authority, transmission operator, and centrally dispatched generator operator should have a plan and means of achieving the outcome of the plan upon the loss of their respective control centers. The Commission has identified three requirements as a minimum for the plans independence from the primary control center, capability to operate for a prolonged period corresponding to the time it would take to replace the primary control center, and the provision of a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center. The Reliability Standard should provide specific Requirements, based on the size or impact to Reliable Operation, to achieve the Commissions requirements."

Not assigned to any project.

FERC - Order on Compliance Filing

Issued 11/16/2007

DIRECTIVE: S-directs NERC to make a compliance filing within 30 days of the date of this order.

Para 1

"directs NERC to make a compliance filing within 30 days of the date of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the Violation Risk Factor assignment for BAL-001-0, Requirements R1 and R2 to medium.

Para 25

"directs NERC to revise the Violation Risk Factor assignment for BAL-001-0, Requirements R1 and R2 to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the Violation Risk Factor for BAL-002-0, Requirement BAL-002-0, Requirement R2 to medium.

Para 29

"directs NERC to revise the Violation Risk Factor for BAL-002-0, Requirement BAL-002-0, Requirement R2 to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to assign a Violation Risk Factor of medium to BAL-002-0, Requirement R4.

Para 30

"directs NERC to assign a Violation Risk Factor of medium to BAL-002-0, Requirement R4."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the Violation Risk Factor for BAL-004-0, Requirement R3 to medium.

Para 43

"directs NERC to revise the Violation Risk Factor for BAL-004-0, Requirement R3 to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the subject Violation Risk Factors to medium.[re: BAL-005-0 R1.1, 1.2, 1.3]

Para 47

"directs NERC to revise the subject Violation Risk Factors to medium.[re: BAL-005-0 R1.1, 1.2, 1.3]"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the Violation Risk Factor assignment for BAL-005-0, Requirement R2 to high.

Para 51

"directs NERC to revise the Violation Risk Factor assignment for BAL-005-0, Requirement R2 to high."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the subject Violation Risk Factor to medium.

Para 55

"directs NERC to revise the subject Violation Risk Factor to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the Violation Risk Factor for BAL-005-0, Requirement R17 to medium

Para 58

"directs NERC to revise the Violation Risk Factor for BAL-005-0, Requirement R17 to medium"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the Violation Risk Factors for FAC- 008-1, Requirements R1.1, R1.2, R1.2.1, and R1.2.2 to medium.

Para 62

"directs NERC to revise the Violation Risk Factors for FAC- 008-1, Requirements R1.1, R1.2, R1.2.1, and R1.2.2 to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to revise the subject Violation Risk Factor to medium.

Para 65

"directs NERC to revise the subject Violation Risk Factor to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

DIRECTIVE: S-directs NERC to submit, within 30 days, a compliance filing containing these modifications incorporated into a revised version of the complete Violation Risk Factor matrix encompassing each Commission-approved Reliability Standard

Para 66

"directs NERC to submit, within 30 days, a compliance filing containing these modifications incorporated into a revised version of the complete Violation Risk Factor matrix encompassing each Commission-approved Reliability Standard"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2007

FERC - Facilities Design, Connections and Maintenance Reliability Standards (Order 705)

Issued 12/27/2007

DIRECTIVE: S- Ref 10591 - The Commission directs the ERO to consider allowing for the 30 minute system adjustment period, the system must be capable of withstanding an N-1 contingency, with load shedding available to system operators as a measure of last resort to prevent cascading failures.

Order 705

"Para 53. In response to the NYSRC and NYISO comments, the Commission reiterates its holding that addressed similar language on loss of load in Order No. 693, regarding Reliability Standard TPL-002-0. In Order No. 693, the Commission noted that allowing for the 30 minute system adjustment period, the system must be capable of withstanding an N-1 contingency, with load shedding available to system operators as a measure of last resort to prevent cascading failures. Order No. 693 stated that the transmission system should not be planned to permit load shedding for a single contingency. Order No. 693 directed NERC to clarify the planning Reliability Standard TPL-002-0 accordingly. The Commission reaches the same conclusion here. We will approve Reliability Standard FAC-010-1, Requirement R2.3 and the ERO should ensure that the clarification developed in response to Order No. 693 is made to the FAC Reliability Standards as well. Amerens comments concerning the operational timeframe do not affect FAC-010-1, which concerns the planning time frame. Para 1788. The Commission agrees with NRC that for operations purposes the N-1 condition is always analyzed from the conditions being experienced. In other words, allowing for the 30 minute system adjustment period, the system must be capable of withstanding an N-1 contingency, with load shedding available to system operators as a measure of last resort to prevent cascading failures. However, for planning purposes, a different analysis applies. The N-1 condition is a Category B event under TPL-002-0, and, following the N-1 contingency, the system must be stable and thermal loading and voltages be within applicable limits. Some adjustment of generation or other controls is permitted to return loadings to within continuous ratings, provided the loadings before adjustments are within the emergency or short-term ratings. Under TPL-002-0 the system is not required to be able to withstand another N-1 contingency. That N-1 requirement is a Category C contingency which is addressed by TPL-003-0. The Commission has addressed NRCs comment concerning N-1 contingencies in real-time operation in TOP-002. In regard to the specific revisions proposed by NRC, the Commission directs the ERO to consider these as part of the Reliability Standards development process."

Not assigned to any project.

DIRECTIVE: S- Ref 10592 - directs NERC to modify these ten Violation Risk Factors.

Para 135

"directs NERC to modify these ten Violation Risk Factors."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10593 - will not allow NERC to reconsider the Violation Risk Factor designations in this instance but, rather, direct below that NERC make specific modifications to its designations. NERC must submit a compliance filing with the revised Violation Risk Factors n

Para 136

"will not allow NERC to reconsider the Violation Risk Factor designations in this instance but, rather, direct below that NERC make specific modifications to its designations. NERC must submit a compliance filing with the revised Violation Risk Factors no later than 90 days before the effective date of the relevant Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10594 - directs NERC to submit a complete Violation Risk Factor matrix encompassing each Commission-approved Reliability Standard and including the correct corresponding version number for each Requirement when it files revised Violation Risk Factors for the FA

Para 138

"directs NERC to submit a complete Violation Risk Factor matrix encompassing each Commission-approved Reliability Standard and including the correct corresponding version number for each Requirement when it files revised Violation Risk Factors for the FAC Reliability Standards."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10595 - In revising the Violation Risk Factors, NERC must address the Commissions concerns, as outlined below, and also follow the five guidelines for evaluating the validity of each Violation Risk Factor assignment.

Para 138

"In revising the Violation Risk Factors, NERC must address the Commissions concerns, as outlined below, and also follow the five guidelines for evaluating the validity of each Violation Risk Factor assignment."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10596 - remand NERCs definition of Cascading Outages subject to NERC refiling.

Para 14

"remand NERCs definition of Cascading Outages subject to NERC refiling."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10597 - direct WECC to file Violation Risk Factors for the FAC-010-1 and FAC-011-1 no later than the effective date of the applicable Reliability Standard.

Para 146

"direct CC to file Violation Risk Factors for the FAC-010-1 and FAC-011-1 no later than the effective date of the applicable Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10598 - Commission directs NERC to revise the Violation Risk Factor assigned to FAC-010-1, Requirements R2.1-R2.2 to high.

Para 165

"Commission directs NERC to revise the Violation Risk Factor assigned to FAC-010-1, Requirements R2.1-R2.2 to high."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10599 - directs NERC to assign a high Violation Risk Factor to FAC-014-1, Requirement R5 and sub- Requirements R5.1.

Para 175

"directs NERC to assign a high Violation Risk Factor to FAC-014-1, Requirement R5 and sub-Requirements R5.1."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10600 - directs NERC to ensure that the proposed Violation Risk Factor for FAC- 010-1, Requirement R3.6 is changed from low to medium.

Para 178

"directs NERC to ensure that the proposed Violation Risk Factor for FAC- 010-1, Requirement R3.6 is changed from lor to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10601 - direct that any revised TPL Reliability Standards must reflect consistency in the lists of contingencies between the two

Para 49 and Footnote #38

"direct that any revised TPL Reliability Standards must reflect consistency in the lists of contingencies between the two"

Assigned: Project 2006-02 - Assess Transmission Future Needs

DIRECTIVE: S- Ref 10602 - direct NERC to revise the Reliability Standard through the Reliability Standards development process to address our concern. This could, for example, be accomplished by deleting the phrase, e.g., load greater than studied from sub-Requirement R.2.3.2.

Para 70

"direct NERC to revise the Reliability Standard through the Reliability Standards development process to address our concern. This could, for example, be accomplished by deleting the phrase, e.g., load greater than studied from sub-Requirement R.2.3.2."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

FERC - Mandatory Reliability Standards for Critical Infrastructure Protection (Order 706)

Issued 1/18/2008

DIRECTIVE: S- Ref 10445 - NERC is directed to develop a timetable for development of the modifications to the CIP Reliability Standards and, if warranted, to develop and file with the Commission for approval, a second implementation plan.

Para 013

"NERC is directed to develop a timetable for development of the modifications to the CIP Reliability Standards and, if warranted, to develop and file with the Commission for approval, a second implementation plan."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10447 - The Commission directs the ERO to develop modifications to the CIP Reliability Standards that require a responsible entity to implement plans, policies and procedure that it must develop pursuant to the CIP Reliability Standards.

Para 075

"We direct the ERO to develop modifications to the CIP Reliability Standards that require a responsible entity to implement plans, policies and procedure that it must develop pursuant to the CIP Reliability Standards"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10560 - We direct the ERO to submit a work plan for Commission approval for developing and filing for approval the modifications to the CIP Reliability Standards that we are directing in this Final Rule

Para 089

"We direct the ERO to submit a work plan for Commission approval for developing and filing for approval the modifications to the CIP Reliability Standards that we are directing in this Final Rule"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10448 - We direct the ERO, in its development of a work plan, to consider developing modifications to CIP-002-1 and the provisions regarding technical feasibility exceptions as a first priority, before developing other modifications required by the Final Rule.

Para 090

"We direct the ERO, in its development of a work plan, to consider developing modifications to CIP-002-1 and the provisions regarding technical feasibility exceptions as a first priority, before developing other modifications required by the Final Rule."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10561 - We direct the ERO to require more frequent, semiannual, self-certifications prior to the date by which full compliance is required

Para 096

"We direct the ERO to require more frequent, semiannual, self-certifications prior to the date by which full compliance is required"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10562 - We adopt our CIP NOPR proposals that, while an entity should not be subject to a monetary penalty if it is unable to certify that it is on schedule, such an entity should explain to the ERO the reason it is unable to self-certify

Para 097

"We adopt our CIP NOPR proposals that, while an entity should not be subject to a monetary penalty if it is unable to certify that it is on schedule, such an entity should explain to the ERO the reason it is unable to self-certify"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10563 - The Commission adopts the CIP NOPR proposals and directs NERC to modify the CIP Reliability Standards through the Reliability Standards development process to remove the first two Terms [reasonable business judgment, and acceptance of risk], and develop

Para 106

"The Commission adopts the CIP NOPR proposals and directs NERC to modify the CIP Reliability Standards through the Reliability Standards development process to remove the first two Terms [reasonable business judgment, and acceptance of risk], and develop specific conditions that a responsible entity must satisfy to invoke the technical feasibility exception"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10564 - The Commission directs the ERO to develop modifications to the CIP Reliability Standards that do not include this term. We note that many commenters, including NERC, agree that the reasonable business judgment language should be removed based largely on

Para 128

"The Commission directs the ERO to develop modifications to the CIP Reliability Standards that do not include this term. We note that many commenters, including NERC, agree that the reasonable business judgment language should be removed based largely on the rationale articulated by the Commission in the CIP NOPR."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10565 - Tthe Commission directs the ERO to modify the CIP Reliability Standards through its Reliability Standards development process to remove references to reasonable business judgment before compliance audits begin.

Para 138

"the Commission directs the ERO to modify the CIP Reliability Standards through its Reliability Standards development process to remove references to reasonable business judgment before compliance audits begin."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10566 - The Commission, therefore, directs the ERO to remove acceptance of risk language from the CIP Reliability Standards.

Para 150

"The Commission, therefore, directs the ERO to remove acceptance of risk language from the CIP Reliability Standards."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10567 - The Commission directs the ERO to develop through its Reliability Standards development process revised CIP Reliability Standards that eliminate references to acceptance of risk.

Para 156

"the Commission directs the ERO to develop through its Reliability Standards development process revised CIP Reliability Standards that eliminate references to acceptance of risk."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10568 - The Commission directs the ERO to develop a set of conditions or criteria that a responsible entity must follow when relying on the technical feasibility exception contained in specific Requirements of the CIP Reliability Standards

Para 178

"directs the ERO to develop a set of conditions or criteria that a responsible entity must follow when relying on the technical feasibility exception contained in specific Requirements of the CIP Reliability Standards"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10569 - Tthe Commission adopts its proposal in the CIP NOPR that technical feasibility exceptions may be permitted if appropriate conditions are in place.

Para 186

"the Commission adopts its proposal in the CIP NOPR that technical feasibility exceptions may be permitted if appropriate conditions are in place."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10570 - the Commission adopts the CIP NOPR proposal for a three step structure to require accountability when a responsible entity relies on technical feasibility as the basis for an exception. We address mitigation and remediation in this section and direct th

Para 192

"the Commission adopts the CIP NOPR proposal for a three step structure to require accountability when a responsible entity relies on technical feasibility as the basis for an exception. We address mitigation and remediation in this section and direct the ERO to develop: (1) a requirement that the responsible entity must develop, document and implement a mitigation plan that achieves a comparable level of security to the Requirement; and (2) a requirement that use of the technical feasibility exception by a responsible entity must be accompanied by a remediation plan and timeline for elimination the use of the technical feasibility exception."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10571 - The Commission thus adopts its CIP NOPR proposal that use and implementation of technical feasibility exceptions must be governed by a clear set of criteria.

Para 209

"The Commission thus adopts its CIP NOPR proposal that use and implementation of technical feasibility exceptions must be governed by a clear set of criteria."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10449 - The Commission directs the ERO to include approval of the mitigation and remediation steps by the senior manager (identified pursuant to CIP-003-1) in the course of developing this framework of accountability.

Para 211

"direct the ERO to include approval of the mitigation and remediation steps by the senior manager (identified pursuant to CIP-003-1) in the course of developing this framework of accountability."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10572 - The Commission directs the ERO to design and conduct an approval process through the Regional Entities and the compliance audit process.

Para 218

"we direct the ERO to design and conduct an approval process through the Regional Entities and the compliance audit process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10573 - The Commission directs NERC, in developing the accountability structure for the technical feasibility exception, to include appropriate provisions to assure that governmental entities that are subject to Reliability Standards as users, owners or operators of the Bul

Para 219

"we direct NERC, in developing the accountability structure for the technical feasibility exception, to include appropriate provisions to assure that governmental entities that are subject to Reliability Standards as users, owners or operators of the Bulk-Power System can safeguard sensitive information."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10574 - The Commission directs the ERO to submit an annual report to the Commission that provides a wide-area analysis regarding use of the technical feasibility exception and the effect on Bulk-Power System reliability.

Para 220

"We direct the ERO to submit an annual report to the Commission that provides a wide-area analysis regarding use of the technical feasibility exception and the effect on Bulk-Power System reliability."

Assigned: Project Standards Internal - For directives unrelated to specific standards

DIRECTIVE: S- Ref 10575 - The Commission directs the ERO to control and protect the data analysis to the extent necessary to ensure that sensitive information is not jeopardized by the act of submitting the report to the Commission.

Para 221

"we direct the ERO to control and protect the data analysis to the extent necessary to ensure that sensitive information is not jeopardized by the act of submitting the report to the Commission."

Assigned: Project Standards Internal - For directives unrelated to specific standards

DIRECTIVE: S- Ref 10576 - The Commission directs the ERO to develop a set of criteria to provide accountability when a responsible entity relies on the technical feasibility exceptions in specific Requirements of the CIP Reliability Standards.

Para 222

"we direct the ERO to develop a set of criteria to provide accountability when a responsible entity relies on the technical feasibility exceptions in specific Requirements of the CIP Reliability Standards."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10452 - The Commission leaves to the EROs discretion whether to incorporate guidance on the development of a risk-based assessment methodology to identify critical assets into the CIP Reliability Standard, develop it as a separate guidance document, or some combination of the two.

Para 253

"While we adopt our CIP NOPR proposal, we recognize that the ERO has already initiated a process to develop such guidance leave to the EROs discretion whether to incorporate such guidance into the CIP Reliability Standard, develop it as a separate guidance document, or some combination of the two."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10453 - The Commission directs the ERO to consider commenter concerns such as how to assess whether a generator or a blackstart unit is critical to Bulk-Power System reliability, the proper quantification of risk and frequency, facilities that are relied on to operate or shut down nuclear generating stations, and the consequences of asset failure and asset misuse by an adversary.

Para 254

"Direct the ERO to consider these commenter concerns [how to assess whether a generator or a blackstart unit is critical to Bulk-Power System reliability, the proper quantification of risk and

frequency, facilities that are relied on to operate or shut down nuclear generating stations, and the consequences of asset failure and asset misuse by an adversary] when developing the guidance."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10454 - The Commission directs either the ERO or its designees to provide reasonable technical support to assist entities in determining whether their assets are critical to the Bulk-Power System.

Para 255

"We direct either the ERO or its designees to provide reasonable technical support to assist entities in determining whether their assets are critical to the Bulk-Power System."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2011

DIRECTIVE: S- Ref 10456 - We direct the ERO to consider this clarification [the meaning of the phrase used for initial system restoration, in CIP-002-1, Requirement R1.2.4] in its Reliability Standards development process.

Para 257

"We direct the ERO to consider this clarification [the meaning of the phrase used for initial system restoration, in CIP-002-1, Requirement R1.2.4] in its Reliability Standards development process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10458 - The ERO should consider Northern Californias suggestion that the ERO establish a process for informal, case-by-case consultations with responsible entities that need assistance in complying with CIP-002-1 (in developing policies and procedures).

Para 258 and 249

"Para Para 258. . . Likewise, the ERO should consider Northern Californias suggestion that the ERO establish a formal feedback loop to assist the industry in developing policies and procedures.

Para 249. In contrast, FirstEnergy agrees that NERC should provide guidance to entities without a wide-area view, such as a generation owner or a partial generation owner, on how to approach a risk-based assessment. Likewise, Northern California suggests that NERC establish a process for informal, case-by-case consultations with responsible entities that need assistance in complying with CIP-002-1. In addition, as part of the re-examination of CIP-002-1, Northern California encourages the incorporation of a formalized feedback loop to assist the industry in developing policies and procedures."

Not assigned to any project.

DIRECTIVE: S- Ref 10457 - The ERO should consider the issue of a Design-Basis Threat (DBT) profile of potential adversaries as an alternative approach to critical asset identification.

Para 258 and 252

"Para 258. As to Entergys suggestion that the ERO provide a DBT profile of potential adversaries, the ERO should consider this issue in the Reliability Standards development process.

Para 252. Entergy suggests, as an alternative approach to critical asset identification, that the ERO provide a Design-Basis Threat (DBT) a profile of the type, composition, and capabilities of an adversary that would assist the industry as a technical baseline against which to establish the proper designs, controls and processes. Entergy claims that a DBT approach would address many of the Commissions concerns regarding the risk-based methodology. For example, a DBT would focus the appropriate emphasis on the potential consequences from an outage of a critical asset. In addition, a DBT would address the Commissions concern that responsible entities will not have enough guidance in developing a risk-based methodology and not know how to identify a critical

asset. Entergy contends that a DBT approach would provide the industry with more certainty in implementing the CIP Reliability Standards."

Not assigned to any project.

DIRECTIVE: S-Ref 10577 - The Commission directs the ERO, in developing the guidance discussed above regarding the identification of critical assets, to consider the designation of various types of data as a critical asset or critical cyber asset.

Para 272

"The Commission directs the ERO, in developing the guidance discussed above regarding the identification of critical assets, to consider the designation of various types of data as a critical asset or critical cyber asset."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: In Drafting

DIRECTIVE: S- Ref 10578 - The Commission directs the ERO to develop guidance on the steps that would be required to apply the CIP Reliability Standards to such data and to consider whether this also covers the computer systems that produce the data.

Para 272

"The Commission directs the ERO to develop guidance on the steps that would be required to apply the CIP Reliability Standards to such data and to consider whether this also covers the computer systems that produce the data."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: In Drafting

DIRECTIVE: S- Ref 10459 - The Commission directs the ERO to specifically require the consideration of misuse of control centers and control systems in the determination of critical assets.

Para 282

"the Commission directs the ERO, through the Reliability Standards development process, to specifically require the consideration of misuse of control centers and control systems in the determination of critical assets"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10579 - The Commission adopts its CIP NOPR proposal and directs the ERO to develop, pursuant to its Reliability Standards development process, a modification to CIP-002-1 to explicitly require that a senior manager annually review and approve the risk-based ass

Para 294

"The Commission adopts its CIP NOPR proposal and directs the ERO to develop, pursuant to its Reliability Standards development process, a modification to CIP-002-1 to explicitly require that a senior manager annually review and approve the risk-based assessment methodology."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10462 - The ERO should consider modifying CIP-002-1 to allow an entity to rely upon the assessment of another entity with interest in the matter.

Para 321

"Para 321. SPP and ReliabilityFirst suggest modifying CIP-002-1 to allow an entity to rely upon the assessment of another entity with interest in the matter. We believe that this is a worthwhile suggestion for the ERO to pursue and the ERO should consider this proposal in the Reliability Standards development process. We note that, even without such a provision, an entity such as a small generator operator is not foreclosed from consulting with a balancing authority or other appropriate entity with a wide-area view of the transmission system."

Not assigned to any project.

DIRECTIVE: S- Ref 10467 - The Commission directs the ERO, in developing the accountability structure for the technical feasibility exception, to include appropriate provisions to assure that governmental entities can safeguard sensitive information.

Para 333

"we direct the ERO, in developing the accountability structure for the technical feasibility exception, to include appropriate provisions to assure that governmental entities can safeguard sensitive information"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10468 - The Commission directs the ERO to provide additional guidance for the topics and processes that the required cyber security policy should address in the cyber security policy required pursuant to CIP-003-1

Para 355

"The Commission directs the ERO to provide additional guidance for the topics and processes that the required cyber security policy should address."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: In Drafting

DIRECTIVE: S- Ref 10580 - The Commission adopts its CIP NOPR interpretation that Requirement R2 of CIP-003-1 requires the designation of a single manager who has direct and comprehensive responsibility and accountability for implementation and ongoing compliance with the CIP Rel

Para 381

"The Commission adopts its CIP NOPR interpretation that Requirement R2 of CIP-003-1 requires the designation of a single manager who has direct and comprehensive responsibility and accountability for implementation and ongoing compliance with the CIP Reliability Standards"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10474 - The Commission directs the ERO to develop modifications to Requirement R6 of CIP-003-1 to provide an express acknowledgment of the need for the change control and configuration management process to consider accidental consequences and malicious actions along with intentional changes.

Due 6/29/2012

Para 397 and 398

"The Commission directs the ERO to develop modifications to Requirement R6 of CIP-003-1 to provide an express acknowledgment of the need for the change control and configuration management process to consider accidental consequences and malicious actions along with intentional changes."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10581 - The Commission therefore directs the ERO to provide guidance, regarding the issues and concerns that a mutual distrust posture must address in order to protect a responsible entitys control system from the outside world.

Para 412

"The Commission therefore directs the ERO to provide guidance, regarding the issues and concerns that a mutual distrust posture must address in order to protect a responsible entitys control system from the outside world."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: In Drafting

DIRECTIVE: S- Ref 10582 - The Commission adopts the CIP NOPRs proposal and directs the ERO to develop a modification to CIP-004-1 that would require affected personnel to receive required training before obtaining access to critical cyber assets (rather than within 90 days of ac

Para 431

"The Commission adopts the CIP NOPRs proposal and directs the ERO to develop a modification to CIP-004-1 that would require affected personnel to receive required training before obtaining access to critical cyber assets (rather than within 90 days of access authorization), but allowing limited exceptions, such as during emergencies, subject to documentation and mitigation."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10481 - We also direct the ERO to identify the parameters of such exceptional circumstances through the Reliability Standards development process

Para 443

"The Commission adopts with modifications the proposal to direct the ERO to modify Requirement R3 of CIP-004-1 to provide that newly-hired personnel and vendors should not have access to critical cyber assets prior to the satisfactory completion of a personnel risk assessment, except in specified circumstances such as an emergency."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10483 - The ERO should consider the comments of APPA/LPPC (seeking clarification regarding discretion in reviewing results of personnel risk assessments and in coming to conclusions regarding the subject employees) and SDG&E (seeking refinements on various issues, including an industry-wide protocol for periodic background and criminal checks, and the use of pre-employment background check procedures for current employees) when developing modifications to CIP-004-1.

Para 446

"Para 446. APPA/LPPC seek clarification regarding discretion in reviewing results of personnel risk assessments and in coming to conclusions regarding the subject employees. SDG&E seeks refinements on various issues, including an industry-wide protocol for periodic background and criminal checks, and the use of pre-employment background check procedures for current employees. The ERO should consider these issues when developing modifications to CIP-004-1 pursuant to the Reliability Standards development process."

Not assigned to any project.

DIRECTIVE: S- Ref 10492 - The Commission adopts the CIP NOPRs proposal to direct the ERO to develop a requirement that each responsible entity must implement a defensive security approach including two or more defensive measures in a defense in depth posture when constructing an electronic security perimeter

Due 6/29/2012

Para 496

"The Commission adopts the CIP NOPRs proposal to direct the ERO to develop a requirement that each responsible entity must implement a defensive security approach including two or more defensive measures in a defense in depth posture when constructing an electronic security perimeter"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10493 - The Commission directs that a responsible entity must implement two or more distinct security measures when constructing an electronic security perimeter, the specific requirements should be developed in the Reliability Standards development process.

Due 6/29/2012

Para 502

"The Commission directs that a responsible entity must implement two or more distinct security measures when constructing an electronic security perimeter, the specific requirements should be developed in the Reliability Standards development process."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10494 - The Commission is directing the ERO to revise the Reliability Standard to require two or more defensive measures.

Due 6/29/2012

Para 503

"The Commission is directing the ERO to revise the Reliability Standard to require two or more defensive measures."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10513 - we direct the ERO to modify Requirement R4 to require these representative active vulnerability assessments at least once every three years, with subsequent annual paper assessments in the intervening years

Due 6/29/2012

Para 547

"we direct the ERO to modify Requirement R4 to require these representative active vulnerability assessments at least once every three years, with subsequent annual paper assessments in the intervening years"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10583 - the Commission directs the ERO to treat any alternative measures for Requirement R1.1 of CIP-006-1 as a technical feasibility exception to Requirement R1.1, subject to the conditions on technical feasibility exceptions.

Para 560

"the Commission directs the ERO to treat any alternative measures for Requirement R1.1 of CIP-006-1 as a technical feasibility exception to Requirement R1.1, subject to the conditions on technical feasibility exceptions."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10514 - The Commission adopts the CIP NOPR proposal to direct the ERO to modify this CIP Reliability Standard to state that a responsible entity must, at a minimum, implement two or more different security procedures when establishing a physical security perimeter around critical cyber assets.

Para 572

"The Commission adopts the CIP NOPR proposal to direct the ERO to modify this CIP Reliability Standard to state that a responsible entity must, at a minimum, implement two or more different security procedures when establishing a physical security perimeter around critical cyber assets."

Assigned: Project 2008-06 - Cyber Security - Order 706

DIRECTIVE: S- Ref 10515 - The Commission directs the ERO to consider, based on the content of the modified CIP-006-1, whether further guidance on defense in depth (a responsible entity must implement two or more distinct and complimentary physical access controls at a physical access point of the perimeter) should be developed in a reference document outside of the Reliability Standards.

Para 575

"The Commission also directs the ERO to consider, based on the content of the modified CIP-006-1, whether further guidance on this defense in depth topic should be developed in a reference document outside of the Reliability Standards."

Assigned: Project Standards Internal - For directives unrelated to specific standards

DIRECTIVE: S- Ref 10584 - Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirements R2.3 and R3.2.

Para 597

"Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirements R2.3 and R3.2."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10585 - Commission therefore directs the ERO to revise Requirement R3 to remove the acceptance of risk language and to impose the same conditions and reporting requirements as imposed elsewhere in the Final Rule regarding technical feasibility.

Para 600

"Commission therefore directs the ERO to revise Requirement R3 to remove the acceptance of risk language and to impose the same conditions and reporting requirements as imposed elsewhere in the Final Rule regarding technical feasibility."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10586 - Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirement R4.2

Para 622

"Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirement R4.2"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10536 - The Commission adopts its proposal to direct the ERO to provide more direction on what features, functionality, and vulnerabilities the responsible entities should address when conducting the vulnerability assessments, and to revise Requirement R8.4 to require an entity-imposed timeline for completion of the already-required action plan.

Para 643

"The Commission adopts its proposal to direct the ERO to provide more direction on what features, functionality, and vulnerabilities the responsible entities should address when conducting the vulnerability assessments, and to revise Requirement R8.4 to require an entity-imposed timeline for completion of the already-required action plan."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10587 - We direct the ERO to revise Requirement R9 to state that the changes resulting from modifications to the system or controls shall be documented quicker than 90 calendar days.

Para 651

"We direct the ERO to revise Requirement R9 to state that the changes resulting from modifications to the system or controls shall be documented quicker than 90 calendar days."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10553 - The Commission adopts, with clarification, the CIP NOPR proposal to direct the ERO to modify CIP-009-1 to incorporate use of good forensic data collection practices and procedures into this CIP Reliability Standard.

Para 706

"The Commission adopts, with clarification, the CIP NOPR proposal to direct the ERO to modify CIP-009-1 to incorporate use of good forensic data collection practices and procedures into this CIP Reliability Standard."

Assigned: Project 2008-06 - Cyber Security - Order 706

DIRECTIVE: S- Ref 10554 - Therefore, we direct the ERO to revise CIP-009-1 to require data collection, as provided in the Blackout Report.

Para 710 and 706

"Therefore, we direct the ERO to revise CIP-009-1 to require data collection, as provided in the Blackout Report."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10555 - The Commission adopts, with modifications, the CIP NOPR proposal to develop modifications to CIP-009-1 through the Reliability Standards development process to require an operational exercise once every three years (unless an actual incident occurs, in which case it may suffice), but to permit reliance on table-top exercises annually in other years.

Para 725

"The Commission adopts, with modifications, the CIP NOPR proposal to develop modifications to CIP-009-1 through the Reliability Standards development process to require an operational exercise once every three years (unless an actual incident occurs, in which case it may suffice), but to permit reliance on table-top exercises annually in other years."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10588 - The Commission adopts the CIP NOPR proposal to direct the ERO to modify Requirement R3 of CIP-009-1 to shorten the timeline for updating recovery plans.

Para 731

"The Commission adopts the CIP NOPR proposal to direct the ERO to modify Requirement R3 of CIP-009-1 to shorten the timeline for updating recovery plans."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10588 - Therefore, we will not allow NERC to reconsider the Violation Risk Factor designations in this instance but, rather, direct below that NERC make specific modifications to its designations.

Para 757

"Therefore, we will not allow NERC to reconsider the Violation Risk Factor designations in this instance but, rather, direct below that NERC make specific modifications to its designations."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10589 - Consistent with the Violation Risk Factor Order, the Commission directs NERC to submit a complete Violation Risk Factor matrix encompassing each Commission approved CIP Reliability Standard.

Para 759

"Consistent with the Violation Risk Factor Order, the Commission directs NERC to submit a complete Violation Risk Factor matrix encompassing each Commission approved CIP Reliability Standard."

Assigned: Project 2008-06 - Cyber Security - Order 706
Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10590 - The Commission adopts the CIP NOPR proposal to direct the ERO to revise 43 Violation Risk Factors.

Para 767

"The Commission adopts the CIP NOPR proposal to direct the ERO to revise 43 Violation Risk Factors."

Assigned: Project 2008-06 - Cyber Security - Order 706
Status: Filed Delivery: 2009

FERC - Order Denying Rehearing and Granting Clarification (Order 706-A)

Issued 5/16/2008

DIRECTIVE: S-we would consider a second implementation plan for achieving compliance with the revised CIP Reliability Standards. Since these revised CIP Reliability Standards could cause additional critical assets to be identified through the external review process

Para 55

"we would consider a second implementation plan for achieving compliance with the revised CIP Reliability Standards. Since these revised CIP Reliability Standards could cause additional critical assets to be identified through the external review process, the Commission expects that the second implementation plan would include the compliance timetable for newly identified critical assets."

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2008

DIRECTIVE: S-we expect that when NERC develops a schedule for responsible entities to bring newly identified critical assets into compliance with Reliability Standards CIP-002-1 through CIP-009-1, this schedule would be at least as prompt as the schedule it proposed

Para 56

"we expect that when NERC develops a schedule for responsible entities to bring newly identified critical assets into compliance with Reliability Standards CIP-002-1 through CIP-009-1, this schedule would be at least as prompt as the schedule it proposed in Table 4 of its Implementation Plan for compliance by newly registered entities."

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2009

FERC - Order on Vioaltion Severity Levels Proposed by the Electric Reliability Organization

Issued 6/19/2008

DIRECTIVE: S-directed to submit a report on its analysis with regard to Guideline 1 within six months of this order, as discussed in the body of this order.

Para 1 (C)

"directed to submit a report on its analysis with regard to Guideline 1 within six months of this order, as discussed in the body of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2008

DIRECTIVE: S-directed to submit a compliance filing within six months of this order, justifying or modifying the Violation Severity Levels with regard to Guideline 2a, as discussed in the body of this order.

Para 1 (D)

"directed to submit a compliance filing within six months of this order, justifying or modifying the Violation Severity Levels with regard to Guideline 2a, as discussed in the body of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S-directed to submit a compliance filing within six months certifying that it has revied each of the Violation Severity Level Assignments for consistency with Guidelines 2b, 3 and 4, validating the assignments that meet Guidelines 2b, 3, and 4, and propos

Para 1 (E)

"directed to submit a compliance filing within six months certifying that it has revied each of the Violation Severity Level Assignments for consistency with Guidelines 2b, 3 and 4, validating the assignments that meet Guidelines 2b, 3, and 4, and proposing revisions to those that fail to meet Guidelines 2b, 3, and 4, as discussed in the body of this order."

Assigned: Project 2007-23 - Violation Severity Levels

Status: Filed Delivery: 2011

DIRECTIVE: S-directed to file the modified Violation Severity Levels as identified in the Appendix within 30 days of this order, as discussed in the body of this order.

Para 1 B)

"directed to file the modified Violation Severity Levels as identified in the Appendix within 30 days of this order, as discussed in the body of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

FERC - Modification of Interchange and Transmission Loading Relief Reliability Standards; and Electric Reliability Organization Interpretation of Specific Requirements of Four Reliability Standards (Order 713)

Issued 7/21/2008

DIRECTIVE: S- Ref 10159 - directs that the ERO, within 15 days of the effective date of this Final Rule, submit a filing that provides an explanation regarding specific language of Requirements R1 and R1.1 of IRO-006-4.

Para 46

"directs that the ERO, within 15 days of the effective date of this Final Rule, submit a filing that provides an explanation regarding specific language of Requirements R1 and R1.1 of IRO-006-4."

Assigned: Project 2006-08 - Transmission Loading Relief

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10161 - . . . Further, the ERO should explain whether Requirements R1 and R1.1 only allow the TLR procedure to be continued when already deployed prior to an actual IROL violation or, alternatively, whether Requirements R1 and R1.1 allow use of th

Para 50

"the Commission does not approve or remand IRO-006-4. Rather, the Commission directs the ERO to submit a filing, within 15 days of the effective date of this Final Rule, that provides an explanation regarding Requirements R1 and R1.1 of IRO-006-4. Specifically, in light of the above discussion, the Commission directs the ERO to provide an explanation regarding the phrase [t]he TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation . . . Further, the ERO should explain whether Requirements R1 and R1.1 only allow the TLR procedure to be continued when already deployed prior to an actual IROL violation or, alternatively, whether Requirements R1 and R1.1 allow use of the TLR procedure as a tool to address actual violations after they occur. If the latter, the ERO is directed to explain why this

application is not contrary to both Blackout Report Recommendation 31 and the Commissions determination in Order No. 693. The EROs filing should include an explanation of those actions that are acceptable, and those that are unacceptable, pursuant to Requirement R1 and R1.1."

Assigned: Project 2006-08 - Transmission Loading Relief

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

FERC - Mandatory Reliability Standard for Nuclear Plant Interface Coordination (Order 716)

Issued 10/16/2008

DIRECTIVE: S-In addition, to ensure the matter is addressed expeditiously, direct NERC to submit a timeline for developing and filing the modification as a compliance filing to be made within 30 days of the date of this Final Rule.

Para 107

"In addition, to ensure the matter is addressed expeditiously, direct NERC to submit a timeline for developing and filing the modification as a compliance filing to be made within 30 days of the date of this Final Rule."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2008

DIRECTIVE: S-direct the ERO to modify Requirement 9.3.5 to clarify references to coping times and off-site por restoration to address the concerns raised in the comments through its Reliability Standards development process.

Para 107

"direct the ERO to modify Requirement 9.3.5 to clarify references to coping times and off-site por restoration to address the concerns raised in the comments through its Reliability Standards development process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor assignment for Requirement R2 from lor to medium no later then 90 days before the effective date of the Reliability Standard.

Para 156

"directs the ERO to revise the violation risk factor assignment for Requirement R2 from lor to medium no later then 90 days before the effective date of the Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor for Requirements R4.2 and R4.3 from medium to high.

Para 164

"directs the ERO to revise the violation risk factor for Requirements R4.2 and R4.3 from medium to high."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor assignment for Requirements R4.2 and R4.3 from medium to high no later then 90 days before the effective date of the Reliability Standard.

Para 168

"directs the ERO to revise the violation risk factor assignment for Requirements R4.2 and R4.3 from medium to high no later then 90 days before the effective date of the Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor assignment for Requirement R5 from medium to high no later then 90 days before the effective date of the Reliability Standard.

Para 173

"directs the ERO to revise the violation risk factor assignment for Requirement R5 from medium to high no later then 90 days before the effective date of the Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor assignment for Requirements R7 and R8 from medium to high no later then 90 days before the effective date of the Reliability Standard.

Para 179

"directs the ERO to revise the violation risk factor assignment for Requirements R7 and R8 from medium to high no later then 90 days before the effective date of the Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor assignment for Requirement R9 from lor to medium.

Para 184

"directs the ERO to revise the violation risk factor assignment for Requirement R9 from lor to medium."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to revise the violation risk factor assignment for Requirement R9 from lor to medium no later then 90 days before the effective date of the Reliability Standard.

Para 187

"directs the ERO to revise the violation risk factor assignment for Requirement R9 from lor to medium no later then 90 days before the effective date of the Reliability Standard."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO, in enforcing NUC-001-1, to require that an integrated entity provides documentation of its arrangements, including appropriate procedures and protocols, ensuring that its business units perform the functions under NUC-001-1 that would o

Para 73

"directs the ERO, in enforcing NUC-001-1, to require that an integrated entity provides documentation of its arrangements, including appropriate procedures and protocols, ensuring that its business units perform the functions under NUC-001-1 that would otherwise be met by separate entities."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-direct the ERO to assess whether the entity providing service over the lor voltage facilities is also subject to NUC-001-1, as discussed in section II(B)(2)(b), above, concerning Transmission Entities and Agreements on NPIRs.

Para 88

"direct the ERO to assess whether the entity providing service over the lor voltage facilities is also subject to NUC-001-1, as discussed in section II(B)(2)(b), above, concerning Transmission Entities and Agreements on NPIRs."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2009*

FERC - Order on Rehearing and Clarification and Accepting Compliance Filing

Issued 11/20/2008

DIRECTIVE: S-directs NERC to use both historical data as the Commission intended in the VSL Order and 2008 compliance data in its evaluation of assigned violation severity levels applying Guideline 1.

Para 22

"directs NERC to use both historical data as the Commission intended in the VSL Order and 2008 compliance data in its evaluation of assigned violation severity levels applying Guideline 1."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2010*

DIRECTIVE: S-NERC must identify and compare (i) each requirement and its current violation severity level assignment, (ii) the requirements pre-2008 historical data, and (iii) the requirements 2008 compliance data.

Para 30

"NERC must identify and compare (i) each requirement and its current violation severity level assignment, (ii) the requirements pre-2008 historical data, and (iii) the requirements 2008 compliance data."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2010*

FERC - Order on Compliance Filing

Issued 1/27/2009

DIRECTIVE: S-Accordingly, the Commission approves the nine Violation Risk Factors and directs the ERO to submit a filing containing revisions to four of them, within 60 days of the date of this order. NERCs compliance filing must also include an updated, complete Vi

Para 14

"Accordingly, the Commission approves the nine Violation Risk Factors and directs the ERO to submit a filing containing revisions to four of them, within 60 days of the date of this order. NERCs compliance filing must also include an updated, complete Violation Risk Factor matrix."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2009*

FERC - Modification of Interchange and Transmission Loading Relief Reliability Standards; and Electric Reliability Organization Interpretation of Specific Requirements of Four Reliability Standards (Order 713-A)

Issued 3/19/2009

DIRECTIVE: S-directs the ERO to submit a filing within 60 days of the effective date of this Supplemental Final Rule revising specified violation risk factors and violation severity levels.

Para 14

"directs the ERO to submit a filing within 60 days of the effective date of this Supplemental Final Rule revising specified violation risk factors and violation severity levels."

Assigned: Project 2006-08 - Transmission Loading Relief

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2009*

DIRECTIVE: S- Ref 10162 - directs the ERO to develop a modification of Requirement R1.1 with respect to the term alone, consistent with this discussion.

Para 36

"directs the ERO to develop a modification of Requirement R1.1 with respect to the term alone, consistent with this discussion."

Assigned: Project 2006-08 - Transmission Loading Relief

Status: Regulator Approved Delivery: 2011

FERC - Mandatory Reliability Standards for Critical Infrastructure Protection (Order 706-B)

Issued 3/19/2009

DIRECTIVE: S-a nuclear power plant licensee may seek an exception from the ERO to the extent that the licensee believes that specific equipment within the balance of plant is subject to NRC cyber security regulations. If the ERO grants the exception, that equipment

Para 50

"a nuclear power plant licensee may seek an exception from the ERO to the extent that the licensee believes that specific equipment within the balance of plant is subject to NRC cyber security regulations. If the ERO grants the exception, that equipment within the balance of plant would not be subject to compliance with the CIP Reliability Standards. We would expect that the ERO would make such determinations with the consultation of NRC and oversight of Commission staff. Thus, to further the development of this ERO process, the ERO should consider the appropriateness of developing a memorandum of understanding with the NRC, or revising existing agreements, to address such matters as NRC staff consultation in the exception application process and sharing of Safeguard Information"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-leave to the discretion of the ERO whether a modification to further refine the exemption language, to reflect the findings of this order, is needed.

Para 52

"leave to the discretion of the ERO whether a modification to further refine the exemption language, to reflect the findings of this order, is needed."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-Rather than the Commission setting an implementation schedule, we agree with commenters that the ERO should develop an appropriate schedule after providing for stakeholder input. Accordingly, we direct the ERO to engage in a stakeholder process to devel

Para 60

"Rather than the Commission setting an implementation schedule, we agree with commenters that the ERO should develop an appropriate schedule after providing for stakeholder input. Accordingly, we direct the ERO to engage in a stakeholder process to develop a more appropriate timeframe for nuclear power plants full compliance with CIP Reliability Standards. Further, we direct NERC to submit, within 180 days of the date of issuance of this order, a compliance filing that sets forth a proposed implementation schedule."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

FERC - Version Two Facilities Design, Connections and Maintenance Reliability Standards (Order 722)

Issued 3/20/2009

DIRECTIVE: S-directs the ERO to submit violation severity levels for all requirements and sub-requirements at issue in this proceeding within 30 days from the effective date of this final rule, as discussed below and as indicated in Attachment A. In light of concern

Para 46

"directs the ERO to submit violation severity levels for all requirements and sub-requirements at issue in this proceeding within 30 days from the effective date of this final rule, as discussed below and as indicated in Attachment A. In light of concerns raised in the comments, the Commission has also made minor clarifying edits to the violation severity levels for certain of the requirements and sub-requirements approved in this proceeding.37 These clarifying edits are also reflected in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to remove violation severity level assignments for Requirements R2 and R2.6 of FAC-010-2 and Requirement R2 of FAC-011-2. The ERO shall submit its revisions to the Commission within 30 days from the issuance of this final rule, as discus

Para 50

"directs the ERO to remove violation severity level assignments for Requirements R2 and R2.6 of FAC-010-2 and Requirement R2 of FAC-011-2. The ERO shall submit its revisions to the Commission within 30 days from the issuance of this final rule, as discussed above and as indicated in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to review those requirements for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of its review the earlier of six months of the effective date of the final rule or in its Violation Severity

Para 52

"directs the ERO to review those requirements for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of its review the earlier of six months of the effective date of the final rule or in its Violation Severity Level Order Guideline 2b, 3, and 4 compliance filing due in September 2009, whichever is earlier."

Assigned: Project 2007-23 - Violation Severity Levels

Status: Filed Delivery: 2011

DIRECTIVE: S-directs the ERO to review the violation severity levels assigned to Requirement R4 for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 within six months of the effective date of the final rule or in its Violation Severity Level O

Para 64

"directs the ERO to review the violation severity levels assigned to Requirement R4 for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 within six months of the effective date of the final rule or in its Violation Severity Level Order Guideline 2b, 3, and 4 compliance filing, whichever is earlier."

Assigned: Project 2007-23 - Violation Severity Levels

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to assign binary violation severity levels to each sub-requirement. Sub-requirements R4.1 through R4.3 are binary requirements and should be assigned a single violation severity level. The ERO shall submit its revisions to sub-requirement

Para 65

"direct the ERO to assign binary violation severity levels to each sub-requirement. Sub-requirements R4.1 through R4.3 are binary requirements and should be assigned a single violation severity level. The ERO shall submit its revisions to sub-requirements R4.1 though R4.3 to the Commission within 30 days from the issuance of this final rule, as discussed above and as indicated in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to modify Requirement R3 of FAC-011-2 to assign a Severe violation severity level to Requirement R3 of FAC-011-2 where the reliability coordinator is missing a description of four or more sub-requirements, within the range of R3.1 throug

Para 70

"directs the ERO to modify Requirement R3 of FAC-011-2 to assign a Severe violation severity level to Requirement R3 of FAC-011-2 where the reliability coordinator is missing a description of four or more sub-requirements, within the range of R3.1 through R3.7, from its methodology for determining system operating limits."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to file revised violation severity levels for FAC-011-2, Requirement R3 within 30 days of the issuance of this final rule, as discussed above and as indicated in Attachment A.

Para 71

"directs the ERO to file revised violation severity levels for FAC-011-2, Requirement R3 within 30 days of the issuance of this final rule, as discussed above and as indicated in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to review the violation severity levels assigned to Requirement R4 for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of the review either within six months of the effective date of the fin

Para 74

"directs the ERO to review the violation severity levels assigned to Requirement R4 for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of the review either within six months of the effective date of the final rule or in its Violation Severity Level Order Guideline 2b, 3, and 4 compliance filing, whichever is earlier."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-direct the ERO to assign binary violation severity levels to each sub-requirement. Sub-requirements R4.1 through R4.3 are binary requirements and should be assigned a single violation severity level. The ERO shall submit its revisions to sub-requirement

Para 75

"direct the ERO to assign binary violation severity levels to each sub-requirement. Sub-requirements R4.1 through R4.3 are binary requirements and should be assigned a single violation severity level. The ERO shall submit its revisions to sub-requirements R4.1 though R4.3 to the Commission within 30 days from the issuance of this final rule, as discussed above and as indicated in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to review the violation severity levels assigned to the subject requirements for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of its review either within six months of the effective date

Para 81

"directs the ERO to review the violation severity levels assigned to the subject requirements for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of its review either within six months of the effective date of the final rule or in its Violation Severity Level Order Guideline 2b, 3, and 4 compliance filing, whichever is earlier."

Assigned: Project 2007-23 - Violation Severity Levels

Status: Filed Delivery: 2011

DIRECTIVE: S-directs the ERO to review the violation severity levels assigned to Requirement R4 for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of its review either within six months of the effective date of the fin

Para 84

"directs the ERO to review the violation severity levels assigned to Requirement R4 for consistency with Violation Severity Level Order Guidelines 2b, 3, and 4 and submit the results of its review either within six months of the effective date of the final rule or in its Violation Severity Level Order Guideline 2b, 3, and 4 compliance filing, whichever is earlier."

Assigned: Project 2007-23 - Violation Severity Levels

Status: Filed Delivery: 2011

DIRECTIVE: S-and directs the ERO to assign binary violation severity levels to Requirement R6 and sub-requirements R6.1 and R6.2. Although the enforcement of Requirement R6, and its sub-requirements, may require the use of auditors, this is a compliance issue best a

Para 89

"and directs the ERO to assign binary violation severity levels to Requirement R6 and sub-requirements R6.1 and R6.2. Although the enforcement of Requirement R6, and its sub-requirements, may require the use of auditors, this is a compliance issue best addressed on a case-by-case basis in the context of a compliance proceeding. The Commission directs the ERO to file revised violation severity levels for Reliability Standard FAC-014-2 Requirement R6 within 30 days of the effective date of this final rule, as discussed above and indicated in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-agrees with BPAs comment relevant to designating the Regional Differences section of FAC-011-2 as section E and directs the ERO to file this revision within 30 days of the effective date of this final rule.

Para 98

"agrees with BPAs comment relevant to designating the Regional Differences section of FAC-011-2 as section E and directs the ERO to file this revision within 30 days of the effective date of this final rule."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs CC to assign a Severe violation severity level to the CC regional difference FAC-010-2 Requirement 1.1 and FAC-011-2 Requirement 1.1. In addition, the Commission directs CC to apply a Severe violation severity level to the CC regional difference

Para 99

"directs CC to assign a Severe violation severity level to the CC regional difference FAC-010-2 Requirement 1.1 and FAC-011-2 Requirement 1.1. In addition, the Commission directs CC to apply a Severe violation severity level to the CC regional difference FAC-010-2 Requirement 1.2 through 1.3 and FAC-011-2 Requirements 1.2 through 1.3. These revisions will create a complete and consistent penalty setting mechanism for the CC regional difference requirements. The Commission directs the ERO to file revised violation risk factors and violation severity levels for the regional difference within 30 days of the effective date of this final rule, as discussed above and indicated in Attachment A."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

FERC - Western Electricity Coordinating Council Regional Reliability Standard Regarding Automatic Time Error Correction (Order 723)

Issued 5/21/2009

DIRECTIVE: S- Ref 10024 - directs WECC to develop revisions to the provision so that a balancing authority will know with specificity the circumstances that trigger the actions required by Requirement R1.2

Para 30

"directs WECC to develop revisions to the provision so that a balancing authority will know with specificity the circumstances that trigger the actions required by Requirement R1.2"

Assigned: Project Regional - For directives assigned to regions

Status: In Drafting

DIRECTIVE: S- Ref 10025 - directs WECC to develop a modification to the regional Reliability Standard consistent with CCs and NERCs explanation that the limit set forth in Requirement 2 of 24 hours per calendar quarter is an accumulated total for the period, resulti

Para 34

"directs WECC to develop a modification to the regional Reliability Standard consistent with CCs and NERCs explanation that the limit set forth in Requirement 2 of 24 hours per calendar quarter is an accumulated total for the period, resulting from either a singular event or a cumulative time limit from a number of events."

Assigned: Project Regional - For directives assigned to regions

Status: In Drafting

DIRECTIVE: S- Ref 10026 - direct NERC to develop in its Rules of Procedure, a methodology for organizing and managing regional definitions and terminology consistent with the principles discussed above.

Para 39

"direct NERC to develop in its Rules of Procedure, a methodology for organizing and managing regional definitions and terminology consistent with the principles discussed above."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: In Drafting

DIRECTIVE: S- Ref 10027 - direct that the violation risk factors assigned to BAL-004-WECC-01, Requirements R1, R2, R3, and R4 be modified from lor to medium. The ERO and WECC must submit a filing within 60 days of the effective date of this Final Rule that includes

Para 51

"direct that the violation risk factors assigned to BAL-004-WECC-01, Requirements R1, R2, R3, and R4 be modified from lor to medium. The ERO and WECC must submit a filing within 60 days of the effective date of this Final Rule that includes the directed modifications."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10028 - directs the ERO and WECC to submit violation severity levels for each Requirement and sub-Requirement that has been assigned a violation risk factor. To allow adequate time for the development of the violation severity levels, the ERO and W

Para 54

"directs the ERO and WECC to submit violation severity levels for each Requirement and sub-Requirement that has been assigned a violation risk factor. To allow adequate time for the development of the violation severity levels, the ERO and WECC must submit a filing within 120 days of the effective date of this Final Rule that includes the directed violation severity levels."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

FERC - Electric Reliability Organization Interpretations of Specific Requirements of Frequency Response and Bias and Voltage and Reactive Control Reliability Standards

Issued 5/21/2009

DIRECTIVE: S-remands to the ERO the proposed interpretation of VAR-001-1, Requirement R4 and directs the ERO to revise the interpretation consistent with the Commissions discussion below

Para 47

"remands to the ERO the proposed interpretation of VAR-001-1, Requirement R4 and directs the ERO to revise the interpretation consistent with the Commissions discussion below"

Not assigned to any project.

DIRECTIVE: S-finds that a voltage schedule should reflect sound engineering, as well as operating judgment and experience. The Commission remands NERCs proposed VAR-001-1, Requirement R4 interpretation, in order that NERC may reconsider its interpretation consiste

Para 49

"finds that a voltage schedule should reflect sound engineering, as well as operating judgment and experience.66 The Commission remands NERCs proposed VAR-001-1, Requirement R4 interpretation, in order that NERC may reconsider its interpretation consistent with this order."

Not assigned to any project.

DIRECTIVE: S-if analysis of other Reliability Standard requirements provides the necessary clarification, such analysis should be made part of the formal interpretation. Thus, in this case, if the actions performed pursuant to other Reliability Standard requirements

Para 50

"if analysis of other Reliability Standard requirements provides the necessary clarification, such analysis should be made part of the formal interpretation. Thus, in this case, if the actions performed pursuant to other Reliability Standard requirements cited in the participants comments describe actions that form the basis for development of voltage schedules, then the interpretation should reflect that fact."

Not assigned to any project.

DIRECTIVE: S-In remanding this interpretation, we are simply instructing NERC to provide a revised interpretation reflecting appropriate consideration of the Commissions ruling that a Reliability Standard must be designed to achieve a specified reliability goal and

Para 56

"In remanding this interpretation, we are simply instructing NERC to provide a revised interpretation reflecting appropriate consideration of the Commissions ruling that a Reliability Standard must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve this goal.76 Furthermore, the Commission, in considering the arguments and comments, has given due weight to the technical expertise of the ERO in deciding how to proceed; the ERO is directed to develop revisions to the Reliability Standard interpretation, consistent with this Final Rule, to address the Commissions concerns."

Not assigned to any project.

FERC - Order Approving Revised Reliability Standards for Critical Infrastructure Protection and Requiring Compliance Filing

Issued 9/30/2009

DIRECTIVE: S-Although Reliability Standard CIP-006-2 touches on elements of a visitor control program, it does not require Responsible Entities to establish a visitor control program. Pursuant to section 215(d)(5) of the FPA, the Commission directs the ERO to develo

Para 30

"Although Reliability Standard CIP-006-2 touches on elements of a visitor control program, it does not require Responsible Entities to establish a visitor control program. Pursuant to section

215(d)(5) of the FPA, the Commission directs the ERO to develop a modification to Reliability Standard CIP-006-2, through the NERC Reliability Standards development process, to add a requirement on visitor control programs, including the use of visitor logs to document entry and exit, within 90 days from the date of this order. While 90 days is a tight schedule compared to the typical development of Standards, facility security is critically important and thus justifies the accelerated deadline. NERC is also free to develop a guidance document addressing the parameters of an adequate visitor control program, if it believes such guidance is necessary."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-the Commission directs the ERO to develop a modification to Reliability Standard CIP-006-2, through the NERC Reliability Standards development process, to add a requirement on visitor control programs, including the use of visitor logs to document entry

Para 30

"the Commission directs the ERO to develop a modification to Reliability Standard CIP-006-2, through the NERC Reliability Standards development process, to add a requirement on visitor control programs, including the use of visitor logs to document entry and exit"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S-directs the ERO to develop a modification to Reliability Standard CIP-008-2, Requirement R1.6, through the NERC Reliability Standards development process, to remove the last sentence of CIP-008-2 Requirement R1.6.

Para 38

"directs the ERO to develop a modification to Reliability Standard CIP-008-2, Requirement R1.6, through the NERC Reliability Standards development process, to remove the last sentence of CIP-008-2 Requirement R1.6."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-the Commission directs the ERO to develop a modification to Reliability Standard CIP-008-2, Requirement R1.6, through the NERC Reliability Standards development process, to remove the last sentence of CIP-008-2 Requirement R1.6

Para 38

"the Commission directs the ERO to develop a modification to Reliability Standard CIP-008-2, Requirement R1.6, through the NERC Reliability Standards development process, to remove the last sentence of CIP-008-2 Requirement R1.6"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S-direct NERC to submit, within 90 days of the date of issuance of this order, a compliance filing that includes a revised Version 2 Implementation Plan, addressing the Version 2 CIP Reliability Standards, that clarifies the matters specified in the attac

Para 41

"direct NERC to submit, within 90 days of the date of issuance of this order, a compliance filing that includes a revised Version 2 Implementation Plan, addressing the Version 2 CIP Reliability Standards, that clarifies the matters specified in the attachment to this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-We direct NERC to submit, within 90 days of the date of issuance of this order, a compliance filing that includes a revised Version 2 Implementation Plan, addressing the Version 2 CIP Reliability Standards, that clarifies the matters specified in the at

Para 41

"We direct NERC to submit, within 90 days of the date of issuance of this order, a compliance filing that includes a revised Version 2 Implementation Plan, addressing the Version 2 CIP Reliability Standards, that clarifies the matters specified in the attachment to this order."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S-direct NERC to submit as part of the compliance filing required by this order an update of the timetable that reflects the plan to address remaining Commission directives from Order No. 706. The filing should be a report of current status, addressing al

Para 44

"direct NERC to submit as part of the compliance filing required by this order an update of the timetable that reflects the plan to address remaining Commission directives from Order No. 706. The filing should be a report of current status, addressing all of the projects including those that are underway and already planned as well as those that have been deferred or not yet scheduled, with a summary description of which Order No. 706 directives NERC plans to address during each phase."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-We direct NERC to submit as part of the compliance filing required by this order an update of the timetable that reflects the plan to address remaining Commission directives from Order No. 706.

Para 44

"We direct NERC to submit as part of the compliance filing required by this order an update of the timetable that reflects the plan to address remaining Commission directives from Order No. 706."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S-The Commission hereby directs NERC to develop modifications to the CIP Reliability Standards using its Reliability Standards Development Process within 90 days of the date of this order, as discussed in the body of this order.

Para C

"The Commission hereby directs NERC to develop modifications to the CIP Reliability Standards using its Reliability Standards Development Process within 90 days of the date of this order, as discussed in the body of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

FERC - Preventing Undue Discrimination and Preference in Transmission Service (Order 890-D)

Issued 11/19/2009

DIRECTIVE: S-Concurrent with this order, the Commission in Docket No. RM08-19-000 is directing the North American Electric Reliability Corporation (NERC) to develop modifications to certain of these Reliability Standards to address the modeling of network resources

Para 7

"Concurrent with this order, the Commission in Docket No. RM08-19-000 is directing the North American Electric Reliability Corporation (NERC) to develop modifications to certain of these Reliability Standards to address the modeling of network resources and its impact on the calculation of ATC. To the extent Duke or other parties have concerns regarding the appropriate modeling of network resource designations on the calculation of ATC, the Commission encourages those parties to raise their concerns in NERCs standards development process"

Not assigned to any project.

FERC - Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments and Mandatory Reliability Standards for the (Order 729)

Issued 11/24/2009

DIRECTIVE: S- Ref 10203 - directs the ERO to audit the capacity benefit margin and transfer reliability margin implementation documents, created pursuant to MOD-004-1 and MOD-008-1 respectively, to ensure that these documents include information, in such detail that

Para 110

"directs the ERO to audit the capacity benefit margin and transfer reliability margin implementation documents, created pursuant to MOD-004-1 and MOD-008-1 respectively, to ensure that these documents include information, in such detail that, given the same information, the results of the capacity benefit margin or transfer reliability margin calculation can be validated."

Not assigned to any project.

DIRECTIVE: S- Ref 10204 - directs the ERO to modify the Reliability Standards so as to increase the document retention requirements to a term of five years, in order to be consistent with the enforcement provisions established in Order No. 670.

Para 129

"directs the ERO to modify the Reliability Standards so as to increase the document retention requirements to a term of five years, in order to be consistent with the enforcement provisions established in Order No. 670."

Not assigned to any project.

DIRECTIVE: S- Ref 10205 - directs the ERO to conduct these audits in the course of its periodic, three-year audits of users, owners and operators of the Bulk-Por System. The ERO shall begin this audit process 60 days after the implementation of these Reliability Sta

Para 131

"directs the ERO to conduct these audits in the course of its periodic, three-year audits of users, owners and operators of the Bulk-Por System. The ERO shall begin this audit process 60 days after the implementation of these Reliability Standards. On an annual basis, to commence on 180 days after the implementation of the Reliability Standards approved herein, the ERO shall file the audit reports (or the results of its audit in any other format) with the Commission."

Not assigned to any project.

DIRECTIVE: S- Ref 10206 - directs the ERO to develop a modification to the Reliability Standards pursuant to the EROs Reliability Standards development process to require disclosure of the various implementation documents to any registered entity who demonstrates to

Para 151

"directs the ERO to develop a modification to the Reliability Standards pursuant to the EROs Reliability Standards development process to require disclosure of the various implementation documents to any registered entity who demonstrates to the ERO a reliability need for such information."

Not assigned to any project.

DIRECTIVE: S- Ref 10207 - Para 160 .... in developing the modifications to the MOD Reliability Standards directed in this Final Rule, the ERO should consider generator nameplate ratings and transmission line ratings including the comments raised by Entegra and ISO/R

Para 160

> "160.In Order No. 890, the Commission also expressed concern regarding the treatment of reservations with the same point of receipt (generator), but multiple points of delivery (load), in setting aside existing transmission capacity. The Commission found that such reservations should not be modeled in the existing transmission commitments calculation simultaneously if their combined reserved transmission capacity exceeds the generators nameplate capacity at the point of receipt. The Commission required the development of Reliability Standards that lay out clear instructions on how these reservations should be accounted for by the transmission service provider. The proposed Reliability Standards achieve this by requiring transmission service providers to identify in their implementation documents how they have implemented MOD-028-1, MOD-029-1, or MOD-030-2, including the calculation of existing transmission commitments. Thus we will not direct the ERO to develop a modification to address over-generation, as suggested by Entegra. Nonetheless, in developing the modifications to the MOD Reliability Standards directed in this Final Rule, the ERO should consider generator nameplate ratings and transmission line ratings including the comments raised by Entegra and ISO/RTO Council."

Not assigned to any project.

DIRECTIVE: S- Ref 10208 - directs the ERO to develop benchmarking and updating requirements to measure modeled available transfer and flowgate capabilities against actual values. Such requirements should specify the frequency for benchmarking and updating the availa

Para 162

> "directs the ERO to develop benchmarking and updating requirements to measure modeled available transfer and flowgate capabilities against actual values. Such requirements should specify the frequency for benchmarking and updating the available transfer and flowgate capability values and should require transmission service providers to update their models after any incident that substantially alters system conditions, such as generation outages."

Not assigned to any project.

DIRECTIVE: S- Ref 10209 - directs the ERO, pursuant to section 215(d)(5) of the FPA and section 39.5(f) of our regulations, to develop a modification to MOD-028-1 and MOD-029-1 to specify that base generation schedules used in the calculation of available transfer c

Para 173

> "directs the ERO, pursuant to section 215(d)(5) of the FPA and section 39.5(f) of our regulations, to develop a modification to MOD-028-1 and MOD-029-1 to specify that base generation schedules used in the calculation of available transfer capability will reflect the modeling of all designated network resources and other resources that are committed to or have the legal obligation to run, as they are expected to run, and to address the effect on available transfer capability of designating and undesignating a network resource."

Not assigned to any project.

DIRECTIVE: S- Ref 10211 - Para 179 ... Therefore, pursuant to section 215(d)(5) of the FPA and section 39.5(f) of our regulations, we direct the ERO to develop modifications to MOD-001-1 and MOD-030-2 to clarify that material changes in system conditions will tri

Para 179

> "direct the ERO to consider this suggestion through its Reliability Standards development process. Further, agree with Cottonwood regarding unscheduled or unanticipated events. Therefore, pursuant to section 215(d)(5) of the FPA and section 39.5(f) of our regulations, direct the ERO to develop modifications to MOD-001-1 and MOD-030-2 to clarify that material changes in system conditions will trigger an update whenever practical. Finally, clarify that these Reliability

Standards shall not be used as a safe harbor to avoid other, more stringent reporting or update requirements."

Not assigned to any project.

DIRECTIVE: S- Ref 10214 - the Commission directs the ERO to develop modifications to MOD-001-1 pursuant to the EROs Reliability Standards development process to prevent the double-counting of data inputs and assumptions. In developing these modifications, the ERO sh

Para 184

"the Commission directs the ERO to develop modifications to MOD-001-1 pursuant to the EROs Reliability Standards development process to prevent the double-counting of data inputs and assumptions. In developing these modifications, the ERO should consider the effects of conditional firm service."

Not assigned to any project.

DIRECTIVE: S- Ref 10215 - directs the ERO to develop a modification to the Reliability Standard pursuant to its Reliability Standards development process requiring transmission service providers to include in their implementation documents any inconsistent modeling

Para 192

"directs the ERO to develop a modification to the Reliability Standard pursuant to its Reliability Standards development process requiring transmission service providers to include in their implementation documents any inconsistent modeling practices along with a justification for such inconsistencies"

Not assigned to any project.

DIRECTIVE: S- Ref 10216 - Para 200 .... we encourage the ERO to consider Midwest ISOs and Entegras comments when developing other modifications to the MOD Reliability Standards pursuant to the EROs Reliability Standards development procedure.

Para 200

"200.With regard to Midwest ISOs concern, while the terms assumptions and no more limiting as used in Requirements R6 and R7 could benefit from further granularity, we find these Requirements to be sufficiently clear for purposes of compliance. Likewise, with regard to Entegras concern, we agree that transmission service providers should use data and assumptions for their available transfer capability or available flowgate capability and total transfer capability or total flowgate capability calculations that are consistent with those used in the planning of operations and system expansion. Under Requirements R6 and R7, transmission service providers and transmission operators must not overstate assumptions that are used in planning of operations. We believe these requirements are sufficiently clear as written. Nonetheless, we encourage the ERO to consider Midwest ISOs and Entegras comments when developing other modifications to the MOD Reliability Standards pursuant to the EROs Reliability Standards development procedure."

Not assigned to any project.

DIRECTIVE: S- Ref 10217 - direct the ERO to develop a modification to Requirements R3.1 and R.4.1 of MOD-004-1 to require load-serving entities and resource planners to determine generation capability import requirements by reference to one or more relevant studies

Para 220

"direct the ERO to develop a modification to Requirements R3.1 and R.4.1 of MOD-004-1 to require load-serving entities and resource planners to determine generation capability import requirements by reference to one or more relevant studies (loss of load expectation, loss of load probability or deterministic risk analysis) and applicable reserve margin or resource adequacy

requirements, as relevant. Such a modification should ensure that a transmission service provider has adequate information to establish the appropriate level of capacity benefit margin."

Not assigned to any project.

DIRECTIVE: S- Ref 10218 - directs the ERO to modify MOD-004-1 to clarify the term manage in Requirement R1.3. This modification should ensure that the Reliability Standard clarify how the transmission service provider will manage situations where the requested use o

Para 222

"directs the ERO to modify MOD-004-1 to clarify the term manage in Requirement R1.3. This modification should ensure that the Reliability Standard clarify how the transmission service provider will manage situations where the requested use of capacity benefit margin exceeds the capacity benefit margin available"

Not assigned to any project.

DIRECTIVE: S- Ref 10219 - directs the ERO to develop a modification sub-requirement R2.2 pursuant to its Reliability Standards development process to clarify the phrase adjacent and beyond Reliability Coordination areas.

Para 231

"directs the ERO to develop a modification sub-requirement R2.2 pursuant to its Reliability Standards development process to clarify the phrase adjacent and beyond Reliability Coordination areas."

Not assigned to any project.

DIRECTIVE: S- Ref 10220 - Para 234 .... the Commission agrees that a graduated time frame for reposting could be reasonable in some situations. Accordingly, the ERO should consider this suggestion when making future modifications to the Reliability Standards.

Para 234

"234.The Commission believes that, as written, the time frames established in Requirement R5 are just and reasonable because they balance the need to reliably operate the grid with the burden on transmission operators to recalculate total transfer capability even when total transfer capability does not often change. Nevertheless, the Commission agrees that a graduated time frame for reposting could be reasonable in some situations. Accordingly, the ERO should consider this suggestion when making future modifications to the Reliability Standards."

Not assigned to any project.

DIRECTIVE: S- Ref 10221 - directs the ERO to develop a modification to MOD-028-1 pursuant to its Reliability Standards development process to address these two concerns.

Para 237

"directs the ERO to develop a modification to MOD-028-1 pursuant to its Reliability Standards development process to address these two concerns."

Not assigned to any project.

DIRECTIVE: S- Ref 10222 - Para 246 .... The ERO should consider Puget Sounds concerns on this issue when making future modifications to the Reliability Standards.

Para 246

"246.Puget Sounds request is reasonable, and insofar as calculating non-firm available transfer capability using counterschedules as opposed to counterflows achieves substantially equivalent results, using them will not be considered a violation. However, we do not have enough information to determine that the terms are generally interchangeable in all circumstances. The

ERO should consider Puget Sounds concerns on this issue when making future modifications to the Reliability Standards.

245.Puget Sound comments that counterflows are a mandatory component of the available transfer capability formula but contends that it is common practice in the Western Interconnection to incorporate counterschedules into non-firm available transfer capability calculations, instead of counterflows as defined in the formula. Puget Sound therefore requests that the Commission clarify in the Final Rule that using counterschedules will not be considered a violation of MOD-029-1. In addition, Puget Sound asks the Commission to clarify that counterflows and counterschedules are interchangeable terms, consistent with Western Interconnection practices."

Not assigned to any project.

DIRECTIVE: S- Ref 10223 - The Commission also directs the ERO to make explicit such [effective date] detail in any future version of this or any other Reliability Standard.

Para 269

"The Commission also directs the ERO to make explicit such [effective date] detail in any future version of this or any other Reliability Standard."

Not assigned to any project.

DIRECTIVE: S- Ref 10224 - hereby directs the ERO to file revised violation severity levels and violation risk factors no later than 120 days before the Reliability Standards become effective.

Para 274

"hereby directs the ERO to file revised violation severity levels and violation risk factors no later than 120 days before the Reliability Standards become effective."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10226 - directs the ERO to develop a modification to the definition of Postback to eliminate the reference to Business Practices.

Para 304

"directs the ERO to develop a modification to the definition of Postback to eliminate the reference to Business Practices."

Not assigned to any project.

DIRECTIVE: S- Ref 10227 - direct the ERO to develop a modification to the definition of Business Practices that would remove the reference to regional reliability organizations and replace it with the term Regional Entity. also direct the ERO to develop a definition

Para 305

"direct the ERO to develop a modification to the definition of Business Practices that would remove the reference to regional reliability organizations and replace it with the term Regional Entity. also direct the ERO to develop a definition of the term Regional Entity to be included in the NERC Glossary."

Not assigned to any project.

DIRECTIVE: S- Ref 10229 - direct the ERO to develop a modification to the definition of ATC Path that does not reference the Commissions regulations

Para 306

"direct the ERO to develop a modification to the definition of ATC Path that does not reference the Commissions regulations"

Not assigned to any project.

FERC - Order Denying Rehearing and Granting Clarificaiton

Issued 12/17/2009

DIRECTIVE: S-we will grant a 90-day extension from the date of issuance of this order so that the ERO will have ample time to develop the requested requirement on visitor control programs.

Para 10

"we will grant a 90-day extension from the date of issuance of this order so that the ERO will have ample time to develop the requested requirement on visitor control programs."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2009

DIRECTIVE: S-directs NERC to make a compliance filing within thirty days of the date of this order submitting to the Commission the following information: ● the anticipated date the scope of systems determination framework will be finalized; ● the status of the deve

Para 14

"directs NERC to make a compliance filing within thirty days of the date of this order submitting to the Commission the following information:

● the anticipated date the scope of systems determination framework will be finalized;

● the status of the development of the exemption process;

● whether the exemption process will include: (i) an application deadline and (ii) a deadline for a determination on an exemption request; and

● a description of any other time parameters that may be included in the exemption process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-we direct NERC to submit as part of its compliance filing, a revised Implementation Plan that incorporates Version 2 CIP Standards into the Implementation Plan schedule.

Para 15

"we direct NERC to submit as part of its compliance filing, a revised Implementation Plan that incorporates Version 2 CIP Standards into the Implementation Plan schedule."

Assigned: Project 2010-09 - Cyber Security Order 706B — Nuclear Plant Implementation Plan

Status: Filed Delivery: 2010

DIRECTIVE: S-Further, in future filings proposing modifications to the CIP Standards, NERC must address how owners and operators of nuclear power plants located in the United States will implement the revised CIP Standards and whether owners and operators can implem

Para 16

"Further, in future filings proposing modifications to the CIP Standards, NERC must address how owners and operators of nuclear power plants located in the United States will implement the revised CIP Standards and whether owners and operators can implement the revised CIP Standards under the proposed Implementation Plan. If NERC does not believe that such future modifications can be implemented under the Implementation Plans schedule, NERC must propose in the filing a new implementation plan addressing nuclear power plant owners and operators compliance with the proposed modifications."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-ERO should consider the appropriateness of developing a memorandum of understanding with the NRC, or revising existing agreements, to address such matters as NRC staff consultation in the exception application process and sharing of Safeguard Informatio

Para 17

"ERO should consider the appropriateness of developing a memorandum of understanding with the NRC, or revising existing agreements, to address such matters as NRC staff consultation in the exception application process and sharing of Safeguard Information. Consistent with Order No. 706-B, the Commission leaves the development of a memorandum of understanding to the discretion of NERC and the NRC."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

FERC - Order Approving Technical Feasibility Exception Procedures and Ordering Compliance Filing

Issued 1/21/2010

DIRECTIVE: S-revise section 1.3 as necessary to designate CIP-006-1 R1.1 as an Applicable Requirement subject to the TFE procedure.

Para 20

"revise section 1.3 as necessary to designate CIP-006-1 R1.1 as an Applicable Requirement subject to the TFE procedure."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to submit a compliance filing, within 90 days of the date of this order, identifying the purpose of a Class-Type TFE list and defining the process for identifying Class-Type TFEs and the procedure for publishing and maintaining the Class-

Para 27

"direct the ERO to submit a compliance filing, within 90 days of the date of this order, identifying the purpose of a Class-Type TFE list and defining the process for identifying Class-Type TFEs and the procedure for publishing and maintaining the Class-Type TFE list. Further Commission action may be necessary depending on the content of this compliance filing."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-directs NERC to provide a semi-annual, non-public report to the Commission tracking additions, modifications, and deletions to the Class-Type TFE list and describing the reasons behind the changes.

Para 28

"directs NERC to provide a semi-annual, non-public report to the Commission tracking additions, modifications, and deletions to the Class-Type TFE list and describing the reasons behind the changes."

Assigned: Project Standards Internal - For directives unrelated to specific standards

DIRECTIVE: S-believe a uniform framework for establishing TFEs under the criteria in Section 3.1 is necessary and appropriate to ensure the effective administration of the TFE process. We therefore direct NERC: (1) to designate which entity or entities will determin

Para 32

"believe a uniform framework for establishing TFEs under the criteria in Section 3.1 is necessary and appropriate to ensure the effective administration of the TFE process. We therefore direct NERC: (1) to designate which entity or entities will determine under section 3.1(iv) what safety risks or issues outweigh the benefits of Strict Compliance with the Applicable Requirement, (2) to designate the entity or entities responsible for determining under section 3.1(vi) what costs far exceed the benefits to the reliability of the Bulk Electric System, and (3) to specify the manner in which reliability benefits are intended to be quantified to make this determination. The modifications set forth above should be made in a compliance filing within ninety days of the date of this order. In the event that multiple entities, such as the various Regional Entities, will be

responsible for making the determinations under sections 3.1(iv) and (vi), NERC must include the steps that it will take to ensure consistency and security in administering the TFE process."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-NERC is hereby directed to modify section 3.2 of Appendix 4D to require any alternative means of compliance to achieve a comparable level of security as Strict Compliance with the requirement. NERC must submit a revised section 3.2 of Appendix 4D in a c

Para 35

"NERC is hereby directed to modify section 3.2 of Appendix 4D to require any alternative means of compliance to achieve a comparable level of security as Strict Compliance with the requirement. NERC must submit a revised section 3.2 of Appendix 4D in a compliance filing within ninety days of the date of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-Commission directs NERC to establish a uniform set of required information for the Part A submission and incorporate it in into its Rules of Procedure. Creating a uniform set of required information will ensure consistency among the regions and will ens

Para 38

"Commission directs NERC to establish a uniform set of required information for the Part A submission and incorporate it in into its Rules of Procedure. Creating a uniform set of required information will ensure consistency among the regions and will ensure that NERC is receiving all of the information necessary to prepare its required reports. NERC should submit the above described revisions in its compliance filing within ninety days of the date of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-Due to concerns over the frequency and complexity of TFE use as well as concerns over both time and the adequacy of Regional Entity resources, the Commission believes that the burden of establishing a valid TFE should remain squarely with the Responsibl

Para 42

"Due to concerns over the frequency and complexity of TFE use as well as concerns over both time and the adequacy of Regional Entity resources, the Commission believes that the burden of establishing a valid TFE should remain squarely with the Responsible Entity requesting it. Accordingly, we direct NERC to change section 5.2.5 of Appendix 4D to address this concern."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-The Commission approves section 5.3 and also directs NERC to revise this section as discussed below. NERC must submit revisions to section 5.3 in a compliance filing within ninety days of the date of this order. As proposed, section 5.3 establishes a pe

Para 45

"The Commission approves section 5.3 and also directs NERC to revise this section as discussed below. NERC must submit revisions to section 5.3 in a compliance filing within ninety days of the date of this order. As proposed, section 5.3 establishes a period during which a Responsible Entity will not be subject to enforcement action after a Regional Entity takes adverse action on a TFE Request. In particular, section 5.3 grants a Regional Entity broad discretion in determining the maximum period of time during which the Responsible Entity would not be in violation of an Applicable Requirement for which the Regional Entity has rejected or disapproved a TFE Request. As drafted, section 5 permits the Regional Entity to set an Effective Date far in the future, thus maximizing the period for which violations could not be found and penalties could not be ordered. While some discretion is useful to allow the Regional Entity to tailor each case to its unique

circumstances, section 5 is entirely open-ended, setting no maximum time period for the Effective Date. A Regional Entity may, by choosing a date far into the future, effectively grant amnesty to a Responsible Entity for an unspecified and indefinite period of time after rejection or disapproval of a TFE request. The Commission believes that stricter limits and guidelines regarding the Effective Date will curb the potential for abuse and likely improve the quality of TFE requests. Accordingly, the Commission requires NERC to adopt in the TFE procedures the following revisions."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-First, there must be an outer limit to the Regional Entitys determination of an Effective Date.directs NERC to revise sections 5.1.5 and 5.2.6 to set an outer limit for the Effective Date that the Regional Entity must observe absent exceptional circumst

Para 46

"First, there must be an outer limit to the Regional Entitys determination of an Effective Date.directs NERC to revise sections 5.1.5 and 5.2.6 to set an outer limit for the Effective Date that the Regional Entity must observe absent exceptional circumstances. Although NERC should propose in its compliance filing an appropriate outer limit, the Commission notes that an outer limit of no longer than 60 days after the Regional Entitys issuance of a notice of rejection and no longer than 90 days after the Regional Entitys issuance of a notice of disapproval should be sufficient in most cases for a Responsible Entity to submit and obtain approval from the Regional Entity of a mitigation plan or to bring itself into Strict Compliance with particular Applicable Requirements of the CIP Standards. Because there are a number of pending TFE requests, the Commission directs NERC to use, on an interim basis until NERC files and the Commission approves the compliance filing addressing this issue, an outer limit on Effective Dates of no longer than 60 days after issuance of a notice of rejection and no longer than 90 days after the issuance of a notice of disapproval."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-Second, the above-described outer limit should include a qualifier that would permit, where exceptional circumstances warrant, the Regional Entity to set an Effective Date that accommodates situations where the applicable outer limit is not sufficient f

Para 47

"Second, the above-described outer limit should include a qualifier that would permit, where exceptional circumstances warrant, the Regional Entity to set an Effective Date that accommodates situations where the applicable outer limit is not sufficient for a Responsible Entity to achieve Strict Compliance with the Reliability Standard at issue. If the Regional Entity determines that exceptional circumstances warrant an Effective Date that is after the proscribed outer limit, we direct the Regional Entity to provide a detailed explanation of such determination in the notice of rejection/disapproval to the Responsible Entity and to provide a copy of such notice to NERC. This requirement, to be added in the compliance filing, would continue to afford the Regional Entity discretion in tailoring each case to its unique circumstances but would also ensure that any extended period be supported by a clear rationale and awarded only to legitimate TFE requests subject to NERCs oversight to, among other things, ensure correct and consistent application."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-We also find that if a TFE Request was not made in good faith or was fraudulent, the Responsible Entity should be subject to an enforcement action where the provisions and protections of section 5.3 are not applicable. The Commission will not tolerate T

Para 48

"We also find that if a TFE Request was not made in good faith or was fraudulent, the Responsible Entity should be subject to an enforcement action where the provisions and protections of section 5.3 are not applicable. The Commission will not tolerate TFE Requests that were not made in good faith or that were fraudulent and we fully expect NERC and Regional Entity staff to monitor TFE requests to detect the misuse of the exceptions procedure. Accordingly, the Commission directs NERC to add a provision to this effect in its 90-day compliance filing."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S-it is critical that the ERO, Regional Entities, and the Commission understand the circumstances and manner in which responsible entities invoke a TFE. See Order No. 706 at P 220. As discussed in more detail below, NERCs annual report to the Commission s

Para Footnote 44

"it is critical that the ERO, Regional Entities, and the Commission understand the circumstances and manner in which responsible entities invoke a TFE. See Order No. 706 at P 220. As discussed in more detail below, NERCs annual report to the Commission should address circumstances and justifications for TFEs and the mitigation measures used to address vulnerabilities."

Assigned: Project Standards Internal - For directives unrelated to specific standards

FERC - Order Setting Deadline for Compliance

Issued 3/18/2010

DIRECTIVE: S- Ref 10032 - Para 14 .... the Commission directs NERC to submit, within six months from the date of issuance of this order, a modification to BAL-003-0 that complies with the Commissions directives as set forth in Order No. 693.

Para 14

"14.Pursuant to section 39.5(g) of the Commissions regulations, the Commission directs NERC to submit, within six months from the date of issuance of this order, a modification to BAL-003-0 that complies with the Commissions directives as set forth in Order No. 693:

(1) Determine an appropriate periodicity of frequency response surveys necessary to ensure that Requirement R2 and other requirements of the Reliability Standard are being met.

(2) Define the necessary amount of frequency response needed for reliable operation for each balancing authority with methods of obtaining and measuring that the frequency response is achieved."

Assigned: Project 2007-12 - Frequency Response

Status: Regulator Approved Delivery: 2010

DIRECTIVE: While the Commission, in Order No. 693, did not set a deadline for submitting modifications to BAL-003-0, we note that almost three years have passed since the issuance of the directive in Order No. 693. Accordingly, pursuant to section 39.5(g) of the Com

Due 5/31/2012

Para 2

"While the Commission, in Order No. 693, did not set a deadline for submitting modifications to BAL-003-0, we note that almost three years have passed since the issuance of the directive in Order No. 693. Accordingly, pursuant to section 39.5(g) of the Commissions regulations, the Commission directs NERC to submit a modification to BAL-003-0 that is responsive to the Commissions directive in Order No. 693 within six months from the date of issuance of this order. .....(1) Determine an appropriate periodicity of frequency response surveys necessary to ensure that Requirement R2 and other requirements of the Reliability Standard are being met."

Assigned: Project 2007-12 - Frequency Response

Status: Regulator Approved Delivery: 2010

FERC - Transmission Relay Loadability Reliability Standard (Order 733)

Issued 3/18/2010

DIRECTIVE: S-direct the ERO to develop a Reliability Standard that requires the use of protective relay systems that can differentiate between faults and stable power swings and, when necessary, phases out protective relay systems that cannot meet this requirement.

Para 150

"direct the ERO to develop a Reliability Standard that requires the use of protective relay systems that can differentiate between faults and stable power swings and, when necessary, phases out protective relay systems that cannot meet this requirement."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-We also direct the ERO to file a report no later than 120 days of this Final Rule addressing the issue of protective relay operation due to power swings. The report should include an action plan and timeline that explains how and when the ERO intends to

Para 150

"We also direct the ERO to file a report no later than 120 days of this Final Rule addressing the issue of protective relay operation due to power swings. The report should include an action plan and timeline that explains how and when the ERO intends to address this issue through its Reliability Standards development process"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-find that undesirable relay operation due to stable power swings is a specific matter that the ERO must address to carry out the goals of section 215, and we direct the ERO to develop a Reliability Standard addressing undesirable relay operation due to

Para 153

"find that undesirable relay operation due to stable power swings is a specific matter that the ERO must address to carry out the goals of section 215, and we direct the ERO to develop a Reliability Standard addressing undesirable relay operation due to stable power swings."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-Also, pursuant to section 215(d)(5) of the FPA, the Commission adopts some of the proposed modifications in the NOPR and thus directs certain modifications to the Reliability Standard. Unless stated otherwise, the Commission directs the ERO to submit th

Para 16

"Also, pursuant to section 215(d)(5) of the FPA, the Commission adopts some of the proposed modifications in the NOPR and thus directs certain modifications to the Reliability Standard. Unless stated otherwise, the Commission directs the ERO to submit these modifications no later than one year from the date of this Final Rule."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-direct the ERO to modify PRC-023-1 to require that transmission owners, generator owners, and distribution providers give their transmission operators a list of transmission facilities that implement sub-requirement R1.2.

Para 186

"direct the ERO to modify PRC-023-1 to require that transmission owners, generator owners, and distribution providers give their transmission operators a list of transmission facilities that implement sub-requirement R1.2."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to modify sub-requirement R1.10 so that it requires entities to verify that the limiting piece of equipment is capable of sustaining the anticipated overload for the longest clearing time associated with the fault.

Para 203

"direct the ERO to modify sub-requirement R1.10 so that it requires entities to verify that the limiting piece of equipment is capable of sustaining the anticipated overload for the longest clearing time associated with the fault."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to document, subject to audit by the Commission, and to make available for review to users, owners and operators of the Bulk-Power System, by request, a list of those facilities that have protective relays set pursuant sub-requirement R1.

Para 224

"direct the ERO to document, subject to audit by the Commission, and to make available for review to users, owners and operators of the Bulk-Power System, by request, a list of those facilities that have protective relays set pursuant sub-requirement R1.12."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to modify the Reliability Standard to add the Regional Entity to the list of entities that receive the critical facilities list.

Para 237

"direct the ERO to modify the Reliability Standard to add the Regional Entity to the list of entities that receive the critical facilities list."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to include section 2 of Attachment A in the modified Reliability Standard as an additional Requirement with the appropriate violation risk factor and violation severity level.

Para 244

"direct the ERO to include section 2 of Attachment A in the modified Reliability Standard as an additional Requirement with the appropriate violation risk factor and violation severity level."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to revise section 1 of Attachment A to include supervising relay elements on the list of relays and protection systems that are specifically subject to the Reliability Standard.

Para 264

"direct the ERO to revise section 1 of Attachment A to include supervising relay elements on the list of relays and protection systems that are specifically subject to the Reliability Standard."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to modify the Reliability Standard to include an implementation plan for sub-100 kV facilities.

Para 283

"direct the ERO to modify the Reliability Standard to include an implementation plan for sub-100 kV facilities."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to remove the exceptions footnote from the Effective Dates section.

Para 284

"direct the ERO to remove the exceptions footnote from the Effective Dates section."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to assign a high violation risk factor to Requirement R3 and to file the new violation risk factor no later than 30 days after the date of this Final Rule..

Para 297

"direct the ERO to assign a high violation risk factor to Requirement R3 and to file the new violation risk factor no later than 30 days after the date of this Final Rule…"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to assign a single violation severity level of severe for violations of Requirement R1.

Para 308

"direct the ERO to assign a single violation severity level of severe for violations of Requirement R1."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to change the violation severity level assigned to Requirement R2 from lower to severe to be consistent with Guideline 2a.

Para 310

"direct the ERO to change the violation severity level assigned to Requirement R2 from lower to severe to be consistent with Guideline 2a."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to assign a severe violation severity level to Requirement R3.

Para 311

"direct the ERO to assign a severe violation severity level to Requirement R3."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to file the new violation severity levels described in our discussion no later than 30 days after the date of this Final Rule

Para 312

"direct the ERO to file the new violation severity levels described in our discussion no later than 30 days after the date of this Final Rule"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-and direct the ERO to modify PRC-023-1 to apply an add in approach to certain sub-100 kV facilities that Regional Entities have already identified or will identify in the future as critical facilities for the purposes the Compliance Registry.

Para 47

"and direct the ERO to modify PRC-023-1 to apply an add in approach to certain sub-100 kV facilities that Regional Entities have already identified or will identify in the future as critical facilities for the purposes the Compliance Registry."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to identify all critical facilities.

Para 50

"we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to identify all critical facilities."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-We also direct that additions to the Regional Entities critical facility list be tested for their applicability to PRC-023-1 and made subject to the Reliability Standard as appropriate.

Para 60

"We also direct that additions to the Regional Entities critical facility list be tested for their applicability to PRC-023-1 and made subject to the Reliability Standard as appropriate."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-and direct the ERO to modify PRC-023-1 to apply an add in approach to sub-100 kV facilities that are owned or operated by currently-Registered Entities or entities that become Registered Entities in the future, and are associated with a facility that is

Para 60

"and direct the ERO to modify PRC-023-1 to apply an add in approach to sub-100 kV facilities that are owned or operated by currently-Registered Entities or entities that become Registered Entities in the future, and are associated with a facility that is included on a critical facilities list defined by the Regional Entity."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-direct the ERO to file its test, and the results of applying the test to a representative sample of utilities from each of the three Interconnections, for Commission approval no later than one year from the date of this Final Rule.

Para 69

"direct the ERO to file its test, and the results of applying the test to a representative sample of utilities from each of the three Interconnections, for Commission approval no later than one year from the date of this Final Rule."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to determine whether a sub-200 kV facility is critical to the reliability of the Bulk-Power System.

Para 69

"we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to determine whether a sub-200 kV facility is critical to the reliability of the Bulk-Power System."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-the ERO must develop a test that: (a) defines expectations of desirable system performance; and (b) describes the steady state and dynamic base cases that the planning coordinator must use in its assessments to carry out Requirement R3. The goal of the

Para 80

"the ERO must develop a test that: (a) defines expectations of desirable system performance; and (b) describes the steady state and dynamic base cases that the planning coordinator must use in its assessments to carry out Requirement R3. The goal of the test must be consistent with the general

reliability principles embedded in the existing series of TPL, Transmission Operations (TOP), Reliability Coordination (IRO), and Protection and Control (PRC) Reliability Standards."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-We agree that such a mechanism is appropriate and direct the ERO to develop an appeals process (or point to a process in its existing procedures) and submit it to the Commission no later than one year after the date of this Final Rule

Para 97

"We agree that such a mechanism is appropriate and direct the ERO to develop an appeals process (or point to a process in its existing procedures) and submit it to the Commission no later than one year after the date of this Final Rule"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to re-file the violation risk factors associated with the Requirements of PRC-023-1 when it submits its comprehensive plan.

Para Footnote 197

"direct the ERO to re-file the violation risk factors associated with the Requirements of PRC-023-1 when it submits its comprehensive plan."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

FERC - Order Directing NERC to Propose Modification of Electric Reliability Organization Rules of Procedure

Issued 3/18/2010

DIRECTIVE: S- Ref 10123 - Para 26 .... we direct the ERO to propose a modification to its Rules of Procedure and the Standards Development Process to ensure that the ERO can comply with a Commission directive to develop a new or modified Reliability Standard pursuan

Para 26

"26.As discussed above, the Commission stated in Order No. 672 that it would take appropriate action if the ERO fails to comply with a Commission order requiring that a Reliability Standard be developed or modified as necessary to maintain reliability. The Commission in Order No. 672 also indicated that it would determine appropriate Commission action regarding the ERO on a case-by-case basis. In this case, we believe that it is appropriate in the first instance to require that the ERO develop a prospective remedy to ensure future compliance. Thus, we direct the ERO to propose a modification to its Rules of Procedure and the Standards Development Process to ensure that the ERO can comply with a Commission directive to develop a new or modified Reliability Standard pursuant to section 215(d)(5) of the FPA. However, we will leave it to the discretion of the ERO to submit detailed proposed rule changes on which the public may comment. The Commission will notice the proposed changes and will issue an order on proposed modifications after consideration of the comments. NERC is directed to submit detailed proposed rule changes within 90 days of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

DIRECTIVE: S- Ref 10122 - Para 29. Moreover, consistent with the Commissions regulations, we direct the ERO, within 90 days of our subsequent order on proposed modifications to the EROs rules, to comply with the Commissions directive in Order No. 693 to modify Relia

Para 29

"29.Moreover, consistent with the Commissions regulations, we direct the ERO, within 90 days of our subsequent order on proposed modifications to the EROs rules, to comply with the Commissions directive in Order No. 693 to modify Reliability Standard FAC-008-1. As

explained in greater detail in Order No. 693, the required modifications include (1) document underlying assumptions and methods used to determine normal and emergency facility ratings; (2) develop facility ratings consistent with industry standards developed through an open, transparent and validated process; and (3) for each facility, identify the limiting component and, for critical facilities, the resulting increase in rating if that component is no longer limiting."

Assigned: Project 2009-06 - Facility Ratings

Status: Filed Delivery: 2011

DIRECTIVE: S-As discussed herein, we also direct the ERO, within 90 days after our subsequent order, to fully comply with our previous directive to develop modifications to Reliability Standard FAC-008-1.

Para 5

"As discussed herein, we also direct the ERO, within 90 days after our subsequent order, to fully comply with our previous directive to develop modifications to Reliability Standard FAC-008-1."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2011

DIRECTIVE: S-To resolve the conflict between the Standards Development Process and the EROs statutory obligation to comply with Commission directives to develop or modify a particular Reliability Standard, we direct the ERO, within 90 days of the date of this order,

Para 5

"To resolve the conflict between the Standards Development Process and the EROs statutory obligation to comply with Commission directives to develop or modify a particular Reliability Standard, we direct the ERO, within 90 days of the date of this order, to submit to the Commission a filing containing specific proposed modifications to the NERC Standards Development Process. These proposed modifications shall be designed to ensure that NERCs Rules of Procedure allow it to comply with Commission directives to submit new or modified Reliability Standards. The Commission will notice NERCs filing for public comment and issue a subsequent order on proposed modifications to NERCs rules. As discussed herein, we also direct the ERO, within 90 days after our subsequent order, to fully comply with our previous directive to develop modifications to Reliability Standard FAC-008-1."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2010

FERC - Interpretation of Transmission Planning Reliability Standard

Issued 3/18/2010

DIRECTIVE: S-directed to submit a modification to Table I, footnote b of Reliability Standard TPL-002-0 that complies with the Commissions directive in Order No. 693, by June 30, 2010.

Para n/a

"directed to submit a modification to Table I, footnote b of Reliability Standard TPL-002-0 that complies with the Commissions directive in Order No. 693, by June 30, 2010."

Assigned: Project 2010-11 - TPL Table 1 Order

Status: Filed Delivery: 2011

FERC - Order Addressing Compliance Filing and Approving Implementation Plan

Issued 3/18/2010

DIRECTIVE: S-directs NERC to make a compliance filing submitting implementation plans for the implementation of Versions 2 and 3 of the CIP Standards by owners and operators of U.S. nuclear power plants on the same schedule established for Version 1 under the Implem

Para 2

"directs NERC to make a compliance filing submitting implementation plans for the implementation of Versions 2 and 3 of the CIP Standards by owners and operators of U.S. nuclear power plants on the same schedule established for Version 1 under the Implementation Plan."

Assigned: Project 2010-09 - Cyber Security Order 706B — Nuclear Plant Implementation Plan
Status: Filed Delivery: 2010

DIRECTIVE: S-should NERC become aware that it will be unable to complete the scope of systems determinations within NERCs projected timeframe (R + 8 months), NERC must timely notify the Commission of the reason for the delay and propose an alternate deadline.

Para 20

"should NERC become aware that it will be unable to complete the scope of systems determinations within NERCs projected timeframe (R + 8 months), NERC must timely notify the Commission of the reason for the delay and propose an alternate deadline."

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2010

FERC - Order Addressing Violation Severity Level Assignments for Critical Infrastructure Protection Relialbity Standards

Issued 3/18/2010

DIRECTIVE: S-directs NERC to submit a compliance filing modifying 57 sets of Violation Severity Level assignments within 60 days of the issuance of this order, as discussed below

Para 1

"directs NERC to submit a compliance filing modifying 57 sets of Violation Severity Level assignments within 60 days of the issuance of this order, as discussed below"

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2010

DIRECTIVE: S-direct NERC to revise seventeen sets of Violation Severity Level assignments, specified in the Appendix, to address interdependency concerns discussed above

Para 23

"direct NERC to revise seventeen sets of Violation Severity Level assignments, specified in the Appendix, to address interdependency concerns discussed above"

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2010

DIRECTIVE: S-directs NERC to revise specific Violation Severity Level assignments, specified in the Appendix, to address the concern described above about levels of non-compliance.

Para 27

"directs NERC to revise specific Violation Severity Level assignments, specified in the Appendix, to address the concern described above about levels of non-compliance."

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2010

DIRECTIVE: S-directs NERC to remove the extraneous language concerning the date of training.

Para 32

"directs NERC to remove the extraneous language concerning the date of training."

Assigned: Project Standards Internal - For directives unrelated to specific standards
Status: Filed Delivery: 2010

DIRECTIVE: S-directs the ERO to revise certain Violation Severity Level assignments to remove ambiguity and improve consistency, as set forth in the Appendix.

Para 33

"directs the ERO to revise certain Violation Severity Level assignments to remove ambiguity and improve consistency, as set forth in the Appendix."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2010*

FERC - Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments and Mandatory Reliability Standards for the (Order 729-A)

Issued 5/5/2010

DIRECTIVE: S-direct the ERO to file notices with the Commission when any other applicable regulatory authority approves any or all of the MOD Reliability Standards approved by the Commission in Order No. 729. The ERO also must post notice of such approval on its web

Para 9

"direct the ERO to file notices with the Commission when any other applicable regulatory authority approves any or all of the MOD Reliability Standards approved by the Commission in Order No. 729. The ERO also must post notice of such approval on its website"

Assigned: Project Standards Internal - For directives unrelated to specific standards

FERC - Order Granting Rehearing for Further Consideration and Scheduling Technical Conference

Issued 5/13/2010

DIRECTIVE: S-direct that the ERO submit, within 30 days after the technical conference, a proposed schedule that includes interim targets for completing studies and analyses needed to develop a frequency response requirement, and a firm compliance deadline for submi

Para 15

"direct that the ERO submit, within 30 days after the technical conference, a proposed schedule that includes interim targets for completing studies and analyses needed to develop a frequency response requirement, and a firm compliance deadline for submission of a modified Reliability Standard that is responsive to the Commission directives in Order No. 693 pertaining to Reliability Standard BAL-003-0"

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed *Delivery: 2010*

DIRECTIVE: Direct that NERC submit, within 30 days after the technical conference, a proposed schedule that includes firm deadlines for completing studies, analyses needed to develop a frequency response requirement, and for submission of a modified Reliability Stan

Due 3/8/2011

Para 2

"direct that NERC submit, within 30 days after the technical conference, a proposed schedule that includes firm deadlines for completing studies, analyses needed to develop a frequency response requirement, and for submission of a modified Reliability Standard that is responsive to the Commission directives in Order No. 693 pertaining to Reliability Standard BAL-003-0. The Commission will provide notice and opportunity to comment on the proposed schedule, as well as other matters discussed at the technical conference. In the meantime, we will defer the six month compliance deadline set forth in the March 18 Order pending further order by the Commission."

Assigned: Project 2007-12 - Frequency Response

Status: Regulator Approved *Delivery: 2010*

FERC - Order on the Electric Reliability Organization's Three-year Performance Assessment

Issued 9/16/2010

DIRECTIVE: Develop and file procedures for coordination of Operations and Engineering fcuntion

Due 3/16/2011

para 178

"Directs NERC to include, in its informational filing due six months after the issuance of this order, the procedures to be used within its Operations and Engineering function relating to the communication and exchange of event analysis and investigative information, and procedures under which the Operations and Engineering function will communicate event analysis and investigative information to the compliance staff of NERC or a Regional Entity.

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2011

DIRECTIVE: Consider practices for use during the Standards development

Due 3/16/2011

para 76

"Directs NERC to consider the following practices for use during the Standards development process as possible means to accomplish these objectives: (1) posting proposed regional Reliability Standards for comment from the continent-wide pool of interested stakeholders for consideration, while allowing the regional open processes to make final determinations to be submitted to NERC; (2) providing for comments from NERC technical staff on proposed regional Reliability Standards; and (3) including regional Reliability Standards in other NERC review processes that it uses for continent-wide Reliability Standards. We further direct NERC to discuss its considerations regarding these suggestions in the informational filing due six months from the date of this order."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2011

DIRECTIVE: Continue quarterly reports on standards development

para 85

"Renews the directive that NERC submit quarterly reports on standards development for additional three years, with additional detail of required analysis."

Assigned: Project Standards Internal - For directives unrelated to specific standards

FERC - Revision to ERO Definition of BES (Order 743)

Issued 11/18/2010

DIRECTIVE: Directs (hard) NERC to create an exemption process

Due 1/25/2012

Para 112

"Rather than devising a revised exemption process in the Final Rule, we direct the ERO to develop a proposed exemption process."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (hard) NERC to work with Regions to develop transition plans

Due 1/25/2012

Para 131

"We direct NERC to work with the Regional Entities affected by this Final Rule to submit for Commission approval transition plans that allow a reasonable period of time for the affected entities within each region to achieve compliance with respect to facilities that are subject to Commission-approved Reliability Standards for the first time based on a revised bulk electric system definition."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (soft) NERC to use the Standards Development Process to revise the
Due 1/25/2012

Para 16

"The Commission directs the ERO to revise the definition of bulk electric system through the NERC Standards Development Process to address the Commissions concerns discussed herein."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (hard) the ERO to modify the definition of BES
Due 1/25/2012

Para 30

"Therefore, pursuant to section 215(d)(5) of the FPA,38 the Commission directs the ERO to modify, through the Standards Development Process, the definition of bulk electric system to address the Commissions technical and policy concerns described more fully herein."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (soft) NERC to consider comments on radial facilities
Due 1/25/2012

Para 55

"55. As we stated in the NOPR, we do not seek to modify the second part of the definition through this Final Rule, which states that [r]adial transmission facilities
serving only load with one transmission source are generally not included in this definition. While commenters would like to expand the scope of the term radial to exclude certain transmission facilities such as tap lines and secondary feeds via a normally open line, we are not persuaded that such categorical exemption is warranted. For example, when the normally open line is closed, it becomes part of the transmission network and therefore should be subject to mandatory Reliability Standards. Commenters also argued that the bright line 100 kV threshold would encourage small utilities to choose not to provide backup service options, reducing overall customer service. We acknowledge these concerns, and direct the ERO to consider these comments regarding radial facilities in crafting an exemption methodology."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

FERC - System Personnel Training Reliability Standards (Order 742)

Issued 11/18/2010

DIRECTIVE: Directs (soft) us to consider developing a flexible implementation plan for PER-005-1 R3.1

Para 24

"With respect to EEIs comment regarding the effective date for entities that may become, in the future, subject to the simulator training requirement in PER-005-1, R3.1, the Commission believes that this issue should be considered by the ERO. We note that, with respect to the Critical Infrastructure Protection (CIP) Reliability Standards, NERC has developed a separate implementation plan that essentially gives responsible entities some lead time before newly acquired assets must be in compliance with the effective CIP Reliability Standards. We direct NERC to consider the necessity of developing a similar implementation plan with respect to PER-005-1, Requirement R3.1."

Not assigned to any project.

DIRECTIVE: Directs (hard) us to develop a standard for training for Local Transmission Control Center personnel

Para 64

"Accordingly, we adopt our NOPR proposal and direct the ERO to develop through a separate Reliability Standards development project formal training requirements for local transmission control center operator personnel. Finally, given the numerous comments stating that term local transmission control center should be defined, we direct NERC to develop a definition of local transmission control center in the standards development project for developing the training requirements for local transmission control center operator personnel. We will not evaluate Associated Electrics proposed definition but, rather, leave it to the ERO to develop an appropriate definition that reflects the scope of local transmission control centers. The Commission will not opine on the appropriate definition of local transmission control center, as this definition can be addressed first using NERCs Reliability Standards Development Procedures..

Additional Info from Para 63
In its comments, NERC has said that it intends to generally model local control center operating personnel training on PER-005-1. Thus, we expect that the Reliability Standard that is developed will require training for local transmission control center that does not significantly diverge from the training requirements set forth in PER-005-1. If the ERO proposes a Reliability Standard that differs significantly from the approved PER-005-1 requirements, NERC must provide in its petition seeking approval of such future standard, adequate technical analysis supporting the different approach."

Not assigned to any project.

FERC - Docket RD10-04-000 (Order Approving Reliability Standards)

Issued 1/6/2011

DIRECTIVE: The Commission directs NERC, in a compliance filing due within 45 days of the date of the order, to identify the entity or entities that are responsible under Reliability Standard BAL-006-2 for calculating Inadvertent Interchange inside the MISO area.

Due 2/21/2011

Para 9, 7, and 8

"Para 9 Therefore, consistent with the above discussion, we direct NERC, in a compliance filing due within 45 days of the date of this order, to identify the entity or entities that are responsible under Reliability Standard BAL-006-2 for calculating Inadvertent Interchange inside the MISO area.

Para 7 As described in its Amended Balancing Authority Agreement, MISO is the Balancing Authority for the MISO footprint. In addition, encompassed within the MISO footprint are smaller Balancing Authorities, termed Local Balancing Authorities, which are also registered by NERC in its compliance registry as Balancing Authorities. MISO and the Local Balancing Authorities operate under a Joint Registration Organization arrangement by which responsibilities for compliance with the Reliability Standards are divided between MISO and the Local Balancing Authorities. In the case of BAL-006-1, which deals with Inadvertent Interchange calculations, MISO is registered with NERC as the responsible entity for compliance with Requirements R1, R2, R4, R4.1, R4.1.1, R4.2, R4.3, and R5 of the Reliability Standard, and certain Local Balancing Authorities are registered with NERC as the responsible entities for compliance with Requirements R3, R4.1, R4.1.2, and R4.3.

Para 8 In practice, MISO performs its compliance responsibilities on a MISO-wide basis under BAL-006-1 (i.e., MISO calculates Inadvertent Interchange between the MISO area and external Balancing Authorities). However, it is not clear from the filing what entity or entities perform the local Balancing Authority responsibilities under BAL-006-1 for the Local Balancing Authorities within the MISO area (i.e., between the Local Balancing Authorities situated inside MISO). Since the Local Balancing Authorities are registered with NERC, they are subject to BAL-006-1, and they are responsible for calculating the Inadvertent Interchange with other Local Balancing Authorities within the MISO footprint. They can contractually delegate this to another entity

pursuant to a Joint Registration Organization agreement. However, it is not clear whether such delegation has, in fact, occurred."

Assigned: Project Standards Internal - For directives unrelated to specific standards

Status: Filed Delivery: 2011

FERC - System Restoration (Order 749)

Issued 3/17/2011

DIRECTIVE: Once the Standard is effective, if industry determines that ambiguity with the term arises, it would be appropriate for NERC to consider its proposal to develop a guideline to aid entities in their compliance obligations.

Para 24 and 18

"Paragraph 24 - Both EEI and APPA recognize potential benefit in the development of further guidance as to the term unique tasks, and BPA is uncertain as to the meaning of the term and consequently unsure as to how to demonstrate compliance with its training obligation. NERC, in its comments about the term, states that it could promote the development of a guideline to aid registered entities in complying with Requirement R11. The Commission notes that this Reliability Standard will not become effective for at least 24 months, during which time ambiguities in language or differences of opinion among affected entities may be resolved in practical ways. Once the Standard is effective, if industry determines that ambiguity with the term arises, it would be appropriate for NERC to consider its proposal to develop a guideline to aid entities in their compliance obligations.
Note: Paragraph 24 is referring to Requirement R11 of EOP-005-2 that requires a minimum of two hours of system restoration training be provided every two years to field switching personnel performing unique tasks associated with the transmission operators restoration plan (i.e., Vagueness of Term Unique Tasks).

Paragraph 18 - Requirement R11 of EOP-005-2 requires that a minimum of two hours of system restoration training be provided every two years to field switching personnel performing unique tasks associated with the transmission operators restoration plan. In the NOPR, the Commission expressed concern that the applicable entities may not understand what the term unique tasks means. We requested comment on what is intended by that term and on whether guidance should be provided to the transmission operators, transmission owners, and distribution providers who are responsible for providing training. In addition, the NOPR sought comment as to whether the unique tasks should be identified in each transmission operators restoration plan."

Not assigned to any project.

DIRECTIVE: NERC should close the gap in the applicability of the draft COM-001-2 so it addresses generation operators and distribution providers.

Para 28

"Paragraph 28 - NERC notes in its comments that the Reliability Coordination Standard Drafting Team is currently working on Project 2006-06 to develop a set of revisions to Reliability Standard COM-001-1.1 to tighten requirements relating to communication capabilities. The Commission believes the objectives of this project in managing, alarming, testing and/or actively monitoring vital primary and emergency telecommunication facilities will close this gap in the Reliability Standard after it is completed and approved. Accordingly, consistent with NERCs comments on its current project and concerns not to create redundancy in development of Reliability Standards, NERC should close the gap in the applicability of the draft COM-001-2 so it addresses generation operators and distribution providers.

Paragraph 27 - Reliability Standard COM-001-1 does not apply to generation operators or distribution providers. Further, we do not accept that each entity whose telecommunications facilities will be needed during the system restoration process is currently subject to COM-001-1.1 Requirement R2 which provides that [e]ach Reliability Coordinator, Transmission Operator and

Balancing Authority shall manage, alarm, test and/or actively monitor vital telecommunications facilities. Special attention shall be given to emergency telecommunications facilities and equipment not used for routine communications."

Not assigned to any project.

FERC - Final Rule Approving Planning Resource Adequacy Assessment Standard BAL-502-RFC-02 (Order 747)

Issued 3/17/2011

DIRECTIVE: The Commission directs RFC to add time horizons to the two main requirements when RFC reviews BAL-502-RFC-02 at the scheduled five-year review.

Para 53

"Para 53 The Commission agrees with the Midwest ISO that time horizons are a factor in NERCs determination of a penalty for a violation and acknowledges that RFC is modifying its standards development process such that it will include time horizons as an element in its regional Reliability Standards template. Accordingly, as proposed in the NOPR, the Commission directs RFC to add time horizons to the two main requirements when RFC reviews BAL-502-RFC-02 at the scheduled five-year review."

Assigned: Project Regional - For directives assigned to regions

DIRECTIVE: Consider, at the time of its five-year review, whether to add a requirement to BAL-502-RFC-02 that would require Planning Coordinators to identify any gap between the needed amount of planning reserves defined in Requirement R1.1 and the planning reserves determined from the resource adequacy analysis.

Para 65

"Para 65 The Commission accepts RFCs commitment to consider, at the time of its five-year review, whether to add a requirement to BAL-502-RFC-02 that would require Planning Coordinators to identify any gap between the needed amount of planning reserves defined in Requirement R1.1 and the planning reserves determined from the resource adequacy analysis."

Assigned: Project Regional - For directives assigned to regions

FERC - Final Rule Approving Interconnection Reliability Operating Limits Standards (Order 748)

Issued 3/17/2011

DIRECTIVE: The Commission requests that the NERC Reliability Coordinators Working Group engage the issues raised in this proceeding with NERC stakeholders, including the NERC Planning and Operating committees, to determine whether a need exists to further refine the delineation of responsibilities between the reliability coordinator and transmission operator for analyzing a class of grid-impactive SOLs..

Para 44

"Para 44Because the study and monitoring of SOLs and IROLs is an issue at the very core of Bulk-Power System reliability, the Commission agrees with EEI that the NERC Reliability Coordinators Working Group should engage the issues raised in this proceeding with NERC stakeholders, including the NERC Planning and Operating committees, to determine whether a need exists to further refine the delineation of responsibilities between the reliability coordinator and transmission operator for analyzing a class of grid-impactive SOLs. Depending on the results of that review, we further encourage NERC, working through its standard development process, to develop appropriate modifications to these and any other related Reliability Standards as necessary."

Not assigned to any project.

DIRECTIVE: The Reliability Coordinator Working Group should further study the issue of requiring both the reliability coordinator and transmission operator to develop action plans for every SOL may add confusion to the process and determine if there is a need for reliability coordinators to have action plans developed and implemented with respect to certain grid-impactive SOLs.

Para 55 and 52

"Para 55The Commission agrees with NERC that requiring both the reliability coordinator and transmission operator to develop action plans for every SOL may add confusion to the process. As a result, the Commission approves IRO-009-1, without modification. However, the Reliability Coordinator Working Group should further study this issue and determine if there is a need for reliability coordinators to have action plans developed and implemented with respect to certain grid-impactive SOLs.

Para 52 In the NOPR, the Commission sought comment on whether reliability coordinators should have action plans developed and implemented with respect to other SOLs apart from IROLs and if so, which SOLs."

Not assigned to any project.

FERC - Final Rule on Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive (Order 751)

Issued 4/21/2011

DIRECTIVE: The Commission directs NERC to remove the WECC regional definition of Disturbance from the NERC Glossary to ensure consistency between the regional and NERC defined terms.

Para 13

"Para13 In addition, we direct WECC to address a concern pertaining to the applicability of FAC-501-WECC-1 and PRC-004-WECC-1, which reference tables of major transmission paths and remedial action schemes posted on the WECC website. We also adopt our NOPR to direct NERC to remove the WECC regional definition of Disturbance from the NERC Glossary to ensure consistency between the regional and NERC defined terms."

Assigned: Project Regional - For directives assigned to regions

DIRECTIVE: The Commission directs WECC to submit revisions to or explanations justifying specific violation risk factors and violation severity levels within 60 days from the issuance of Order 751.

Due 6/20/2011

Para 133 and 129 thru 132

"Para 133 Consistent with our concerns outlined above, we direct WECC to consider modifications to the violation risk factors and violation severity levels assigned to these four regional Reliability Standards. Accordingly, we direct WECC to submit revisions to or explanations justifying these violation risk factors and violation severity levels within 60 days from the issuance of this order. Consistent with NERC practice, these violation risk factors and violation severity levels should be in table format. Interested parties will have an opportunity to comment on this filing. In addition, the Commission supports WECCs agreement to conform the violation severity levels format to that of the NERC Reliability Standards related to FAC-501-WECC-1, VAR-002-WECC-1 and VAR-501-WECC-1 in future revisions to the regional Reliability Standards. Accordingly, we expect WECC to make future revisions to these and other violation risk factors and violation severity level assignments consistent with any changes in NERC and Commission guidelines.

Para 129 In FAC-501-WECC-1, the Lower violation severity level applies when the transmission maintenance and inspection plan does not include facilities for one of the paths in the WECC Transfer Path Table, but the transmission owners are performing maintenance and inspection for those facilities. The Moderate violation severity level applies when the transmission maintenance

and inspection plan does not include facilities for two of the paths in the WECC Transfer Path Table, and the transmission owners are not performing maintenance and inspection for those facilities. Based on these two violation severity level assignments, it is ambiguous which violation severity level would apply if the transmission maintenance and inspection plan does not include facilities for one of the paths in the WECC Transfer Path Table, and the transmission owners are not performing maintenance and inspection for those facilities.

Para 130 In PRC-004-WECC-1, the violation severity levels for Requirement R2.3 do not define any potential violations for the transmission owner even though both Requirement 2.3 and sub-Requirement 2.3.1 apply to the transmission owner, a situation that could be viewed as violating violation severity level guideline 3. Also in PRC-004-WECC-1, violation risk factors have not been assigned for Requirements R2, R2.4 and R2.4.1. If WECC believes that it would be inappropriate to assign violation risk factors to these requirements, it should submit an explanation.

Para 131 In VAR-002-WECC-1, Requirement R1 requires the automatic voltage regulators to be in service and in automatic voltage control mode but the violation severity levels for Requirement R1 specify only that the automatic voltage regulator must be in service, which could be viewed as violating violation severity level guideline 3. Also, the violation severity levels for VAR-002-WECC-1, Requirement R1 lower the level of compliance from the levels of non-compliance associated with the currently-effective VAR-STD-002a-1. VAR-STD-002a-1 includes four levels of non-compliance (Level 1, Level 2, Level 3, and Level 4) which have been translated into the four violation severity levels (Lower, Moderate, High, and Severe). The four levels of non-compliance are defined by the automatic voltage regulator in service hours being: (Level 1) less than 98 percent but at least 96 percent; (Level 2) less than 96 percent but at least 94 percent; (Level 3) less than 94 percent but at least 92 percent; and (Level 4) less than 92 percent. The violation severity levels assigned to Requirement R1 of VAR-002-WECC-1 are defined by the automatic voltage regulator in service hours being: (Lower) less than 98 percent but at least 90 percent; (Moderate) less than 90 percent but at least 80 percent; (Higher) less than 80 percent but at least 70 percent; and (Severe) less than 70 percent. This change appears to violate violation severity level guideline 1. In addition, WECC has determined that High and Severe violation severity levels are not applicable to Requirement R2 of VAR-002-WECC-1.

132 In VAR-501-WECC-1, the violation severity levels for Requirement R1 lower the level of compliance from the levels of non-compliance associated with the currently-effective VAR-STD-002a-1. VAR-STD-002b-1 includes four levels of non-compliance (Level 1, Level 2, Level 3, and Level 4) which have been translated into the four violation severity levels (Lower, Moderate, High, and Severe). The four levels of non-compliance are defined by the power system stabilizer in service hours being: (Level 1) less than 98 percent but at least 96 percent; (Level 2) less than 96 percent but at least 94 percent; (Level 3) less than 94 percent but at least 92 percent; and (Level 4) less than 92 percent. The proposed violation severity levels are defined by the power system stabilizer in service hours being: (Lower) less than 98 percent but at least 90 percent; (Moderate) less than 90 percent but at least 80 percent; (Higher) less than 80 percent but at least 70 percent; and (Severe) less than 70 percent. This change appears to violate violation severity level guideline 1. For Requirement R2, only lower and moderate violation severity levels were defined."

Assigned: Project Regional - For directives assigned to regions
Status: Filed Delivery: 2011

DIRECTIVE: The Commission directs WECC to file, within 60 days from the issuance of this Final Rule, its criterion for identifying and modifying major transmission paths listed in the WECC Transfer Path Table.
Due 6/20/2011

Para 24

"Para 24 Consistent with our NOPR proposal and WECCs comments the Commission directs WECC to file, within 60 days from the issuance of this Final Rule, its criterion for identifying and

modifying major transmission paths listed in the WECC Transfer Path Table. Moreover, the Commission accepts WECCs commitment to publicly post any revisions to the WECC Transfer Path Table on the WECC website with concurrent notification to the Commission, NERC, and industry. We believe that this process balances the interests of WECC in developing timely revisions to the WECC Transfer Path Table with the need for adequate transparency for transmission owners that are affected by changes to the WECC Transfer Path Table."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2011

DIRECTIVE: The Commission recommends that WECC consider the comments of Bonneville, PacifiCorp and TANC when it develops future modifications to FAC-501-WECC-1.

Para 32, 28, and 29

"Para 32 In response to our concern that use of the term System Operating Limit could expand the applicability of FAC-501-WECC-1 to transmission facilities that are not listed in the WECC Transfer Path Table, we accept WECCs explanation that the applicability of the Reliability Standard is clear. Consistent with comments filed by Bonneville and PacifiCorp, we find that it would be unreasonable to interpret FAC-501-WECC-1 as requiring transmission owners to be responsible for maintaining and inspecting transmission facilities related to System Operating Limits on paths that they do not own. Nevertheless, we believe that this could be clearer in the language of Requirement R1. Accordingly, we recommend that WECC consider the comments of Bonneville, PacifiCorp and TANC when it develops future modifications to FAC-501-WECC-1. Para 28 SDG&E and TANC support the use of System Operating Limits instead of Operating Transfer Capability limits. SDG&E comments that the methodology for determining System Operating Limits is the same as for Operating Transfer Capability limits and that there is no confusion related to the use of System Operating Limit in Requirement R1. TANC comments that an interpretation of Requirement R1 that requires transmission owners of major paths to be responsible for maintaining and inspecting transmission facilities owned by other entities whose facilities may be necessary to maintain System Operating Limits associated with the major path would be infeasible, overly burdensome on the individual owners of the major paths and inconsistent with the spirit of the proposed regional Reliability Standard as written. TANC suggests that using the term Operating Transfer Capability limit as a substitute for System Operating Limit may resolve any confusion, as could a modification clarifying that each major path transmission owners responsibility is to inspect and maintain its own facilities.

Para 29 Bonneville and PacifiCorp also support the use of the term System Operating Limit instead of the term Operating Transfer Capability because both terms result in the same requirement that maintenance be performed to ensure that each path is capable of operating up to the paths limit. Nevertheless, Bonneville and PacifiCorp comment that Requirement R1 is unclear as to which facilities are covered and who is responsible for the maintenance of those facilities. Bonneville contends that the transmission owner should be responsible only for the facilities it owns, and the standard should make this clear. PacifiCorp suggests that Requirement R1 should be modified to reflect that transmission owners should have a transmission maintenance and inspection plan detailing their requirements that apply to all transmission facilities identified by the Transmission Operator of the transmission path as necessary for System Operating Limits associated with each of the transmission paths identified in the WECC Transfer Path Table."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2011

DIRECTIVE: The Commission directs WECC to file, within 60 days from the issuance of this Final Rule, its criteria for identifying and modifying major transmission paths listed in the WECC Transfer Path Table and major remedial actions schemes listed in the WECC Remedial Action Schemes Table.

Due 6/20/2011

Para 41

"Para 41 Consistent with our NOPR proposal and WECCs comments the Commission directs WECC to file, within 60 days from the issuance of this Final Rule, its criteria for identifying and modifying major transmission paths listed in the WECC Transfer Path Table and major remedial actions schemes listed in the WECC Remedial Action Schemes Table. Moreover, the Commission accepts WECCs commitment to publicly post any revisions to the WECC Transfer Path Table, WECC Remedial Action Schemes Table, and the associated catalogs on the WECC website with concurrent notification to the Commission, NERC, and industry. We believe that this process balances the interests of WECC in developing timely revisions to the WECC Transfer Path Table with the need for adequate transparency for transmission owners that are affected by changes to the WECC Transfer Path Table and the WECC Remedial Action Schemes Table."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2011

DIRECTIVE: The Commission encourages NERC to consider the comments of PacifiCorp regarding the development of a continent-wide definition of Functionally Equivalent Protection System and Functionally Equivalent Remedial Action Scheme during the development of Project 2009-07.

Para 50 and 47

"Para 50 We will not direct NERC to consider PacifiCorps suggestion that the Commission direct NERC to consider the development of a continent-wide definition of functionally equivalent protection system and functionally equivalent remedial action scheme. We note that NERC has an ongoing project that could address this issue. We encourage NERC to consider the comments of PacifiCorp in this proceeding during the development of Project 2009-07 and encourage PacifiCorp to participate in this NERC project.

Para 47 Bonneville and PacifiCorp generally agree that the terms Functionally Equivalent Protection System and Functionally Equivalent Remedial Action Scheme are useful because they describe a protection system or remedial action scheme that is able to provide the necessary functionality of a protection system or remedial action scheme without the loss of any necessary dependability for the system. PacifiCorp further suggests that the Commission direct NERC to consider the development of a continent-wide definition of Functionally Equivalent Protection System and Functionally Equivalent Remedial Action Scheme."

Not assigned to any project.

DIRECTIVE: The Commission encourages WECC to consider the comments of Mariner in during the development of VAR-002-WECC-1 in its Project WECC-0046.

Para 67 and 63

"The Commission encourages WECC to consider the comments of Mariner in during the development of VAR-002-WECC-1 in its Project WECC-0046."

Assigned: Project Regional - For directives assigned to regions

FERC - Final Rule on TOP-007-WECC-1 (Order 752)

Issued 4/21/2011

DIRECTIVE: The Commission directs WECC to file, within 60 days from the issuance of Order 752, WECCs criteria for identifying and modifying major transmission paths listed in the WECC Transfer Path Table.
Due 6/20/2011

Para 43

"Para 43 Consistent with our NOPR proposal, WECCs and other parties comments, the Commission directs WECC to file, within 60 days from the issuance of this Final Rule, WECCs criteria for identifying and modifying major transmission paths listed in the WECC Transfer Path Table. Moreover, the Commission accepts WECCs commitment to publicly post any revisions to the WECC Transfer Path Table on the WECC website with concurrent notification to the Commission, NERC, and industry. We believe that this process balances the interests of WECC

in developing timely revisions to the WECC Transfer Path Table with the need for adequate transparency for transmission owners that are affected by changes to the WECC Transfer Path Table."

Assigned: Project Regional - For directives assigned to regions

Status: Filed Delivery: 2011

DIRECTIVE: The Commission directs WECC to file, within 120 days from the issuance of Order 752, a modification to the VRF for Requirement R1 of TOP-007-WECC-1.

Due 8/19/2011

Para 50 and 49

"Para 50 Requirement R1 applies to both stability and thermally constrained SOLs. Stability constrained SOLs by their nature can potentially have widespread system impacts such as instability, uncontrolled separation and voltage collapse. While WECC uses remedial action schemes (RAS) to control these dynamic challenges, the RAS can, in some cases, lead to controlled separation and controlled variations of stability impacts. Given the exposure to potential controlled separations, the Commission finds that the appropriate VRF for Requirement R1 is high. Accordingly, the Commission directs WECC to modify the VRF assignment to high and submit the modification in a compliance filing to be submitted within 120 days from the date this Final Rule issues.

Para 49 The Commission has reviewed the VRF assignments for TOP-007-WECC-1 and it is our view that the VRFs assigned to Requirements R1 and R2 are not consistent with the above-described Commission guidance. The Commission does not agree with WECC that Requirement R1 should be assigned a medium VRF instead of high. The VRF Order guidance emphasizes consistency with NERCs definition of the VRF level. NERC defines a high risk requirement as follows: A requirement that, if violated, could directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures. . . "

Assigned: Project Regional - For directives assigned to regions

DIRECTIVE: The Commission directs WECC to file, within 120 days from the issuance of Order 752, a modification to the VRF for Requirement R2 of TOP-007-WECC-1.

Due 8/19/2011

Para 51

"Para 51 With respect to Requirement R2, as WECC acknowledges in its comments, Requirement R2 should be assigned a medium VRF. The Commission finds that Requirement R2 is not administrative in nature as it prohibits a transmission operator from allowing the net scheduled interchange across a path from exceeding the paths SOLs. Violations of Requirement R2 could directly affect the electrical state of the Bulk-Power System. Thus, the nature of Requirement R2 is consistent with NERCs definition of a medium VRF assignment level rather than the lower level. Accordingly, we direct WECC to modify the VRF assignment for Requirement R2 to medium and submit the modification in a compliance filing to be submitted within 120 days from the date this Final Rule issues."

Assigned: Project Regional - For directives assigned to regions

DIRECTIVE: The Commission directs WECC to file, within 120 days from the issuance of Order 752, modifications to the VSLs for TOP-007-WECC-1 to reflect NERCs approved table format.

Due 8/19/2011

Para 53

"Para 53 The Commission accepts WECCs commitment to revise the VSL assignments to conform to the NERC table format. Accordingly, we direct WECC to modify the VSL assignments for TOP-007-WECC-1, to reflect NERCs approved table format and include the revision as part of its compliance filing to be submitted within 120 days from the date this Final Rule issues."

Assigned: Project Regional - For directives assigned to regions

Appendix C

Directives Associated with Standards Development Projects Active as of June 30, 2011

Project Report

Project 2006-02
Assess Transmission Future Needs

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10421 - Applicable entities must define and document the proxies necessary to simulate cascading outages.

Para 1820

"Applicable entities must define and document the proxies necessary to simulate cascading outages."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot *Delivery: 2011*

DIRECTIVE: S- Ref 10405 - Para 1751 - Require a peer review of planning assessments with neighboring entities

Para 1766

"1751 - Require a peer review of planning assessments with neighboring entities"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot *Delivery: 2011*

DIRECTIVE: S- Ref 10406 - Para 1759 - Modify requirement R1.3 to substitute the reference to regional reliability organization with regional entity.

Para 1767

"1759 - Modify requirement R1.3 to substitute the reference to regional reliability organization with regional entity."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot *Delivery: 2011*

DIRECTIVE: S- Ref 10407 - Para 1786 - Require assessments of outages of critical long lead time equipment, consistent with an entitys spare equipment strategy

Para 1768

"1786 - Require assessments of outages of critical long lead time equipment, consistent with an entitys spare equipment strategy"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot *Delivery: 2011*

DIRECTIVE: S- Ref 10408 - Para 1797 - Address concerns with footnote (a) of Table 1 with regard to applicability of emergency ratings and consistency of normal ratings and voltages with values obtained from other reliability standards and concerns raised by Internat

Para 1769

"1797 - Address concerns with footnote (a) of Table 1 with regard to applicability of emergency ratings and consistency of normal ratings and voltages with values obtained from other reliability standards and concerns raised by International Transmission with regard to the footnotes in Table 1"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10409 - Para's 1694, 1704, & 1706 - Determine critical system conditions in the same manner as proposed in TPL-001.

Para 1785

"1694, 1704, & 1706 - Determine critical system conditions in the same manner as proposed in TPL-001."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10410 - Requires assessment of planned outages of long lead time critical equipment consistent with the entitys spare equipment strategy.

Para 1786

"Requires assessment of planned outages of long lead time critical equipment consistent with the entitys spare equipment strategy."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10411 - Requires all generators to ride through the same set of category B and C contingencies as required by wind generators in Order No. 661, or to simulate without this capability as tripping.

Para 1787

"Requires all generators to ride through the same set of category B and C contingencies as required by wind generators in Order No. 661, or to simulate without this capability as tripping."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10412 - Document the load models used in system studies and the rationale for their use.

Para 1789

"Document the load models used in system studies and the rationale for their use."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10413 - Para 1773 - Clarify the phrase permit operating steps necessary to maintain system control in the footnote (a) and the use of emergency ratings.

Para 1790

"1773 - Clarify the phrase permit operating steps necessary to maintain system control in the footnote (a) and the use of emergency ratings."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10414 - Consider NRCs comments regarding clarifying the N-1 state as being always applicable to the current conditions as part of the standards development process.

Para 1788

"Consider NRCs comments regarding clarifying the N-1 state as being always applicable to the current conditions as part of the standards development process."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10404 - Para's 1694, 1704, & 1706 - Consider the full range of variables when determining critical system conditions but only those deemed to be significant need to be assessed and documentation provided that explain the rational for selection.

Para 1765

"1694, 1704, & 1706 - Consider the full range of variables when determining critical system conditions but only those deemed to be significant need to be assessed and documentation provided that explain the rational for selection.

Determine critical system conditions and study years by conducting sensitivity analysis with due consideration of the factors outlined by the Commission."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10420 - 1806 - Clarify the term controlled load interruption.

Para 1818

"1806 - Clarify the term controlled load interruption."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10422 - Para 1821 - Tailor the purpose statement to reflect the specific goal of the standard.

Para 1821

"1821 - Tailor the purpose statement to reflect the specific goal of the standard."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10423 - Para 1788 - Address NRC concerns as described in TPL-002 through the standards development process.

Para 1822

"1788 - Address NRC concerns as described in TPL-002 through the standards development process."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10424 - Consider the comments on major load pockets as part of the standards development process.

Para 1824

"Consider the comments on major load pockets as part of the standards development process."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10425 - Para 1765 - Determine critical system conditions in the same manner as proposed in TPL-001.

Para 1832

"1765 - Determine critical system conditions in the same manner as proposed in TPL-001."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10426 - Para 1836 - Identify options for reducing the probability or impacts of extreme events that cause cascading.

Para 1833

"1836 - Identify options for reducing the probability or impacts of extreme events that cause cascading."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10427 - Para 1836 - Expand the list of category D events to include recent actual events.

Para 1834

"1836 - Expand the list of category D events to include recent actual events."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10428 - Tailor the purpose statement to reflect the specific goal of the standard.

Para 1835

"Tailor the purpose statement to reflect the specific goal of the standard."

Assigned: Project 2006-02 - Assess Transmission Future Needs

DIRECTIVE: S- Ref 10429 - Encourages NERC to utilize input from the Commissions technical conferences on regional planning as directed in Order No. 890 to improve this standard.

Para 1841

"Encourages NERC to utilize input from the Commissions technical conferences on regional planning as directed in Order No. 890 to improve this standard."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10416 - Commission, therefore, suggests that the ERO consider developing a ceiling on the amount and duration of consequential load loss that will be acceptable. If the ERO determines that such a ceiling is appropriate, it should be developed throu

Para 1795

"Commission, therefore, suggests that the ERO consider developing a ceiling on the amount and duration of consequential load loss that will be acceptable. If the ERO determines that such a ceiling is appropriate, it should be developed through the EROs Reliability Standards development process"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10417 - Regarding the comments of Entergy and Northern Indiana that the Reliability Standard should allow entities to plan for the loss of firm service for a single contingency, the Commission finds that their comments may be considered through the

Para 1794

"Regarding the comments of Entergy and Northern Indiana that the Reliability Standard should allow entities to plan for the loss of firm service for a single contingency, the Commission finds that their comments may be considered through the Reliability Standards development process. However, we strongly discourage an approach that reflects the lowest common denominator"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10418 - The Commission, therefore, directs the ERO to modify the second sentence of footnote (b) to clarify that manual system adjustments other than shedding of firm load or curtailment of firm transfers are permitted to return the system to a nor

Para 1796

"The Commission, therefore, directs the ERO to modify the second sentence of footnote (b) to clarify that manual system adjustments other than shedding of firm load or curtailment of firm transfers are permitted to return the system to a normal operating state after the first contingency, provided these adjustment can be accomplished within the time period allowed by the short term or emergency ratings."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10415 - Standard should be clarified to not allow an entity to plan for the loss of non-consequential load in the event of a single contingency.

Para 1794

"Standard should be clarified to not allow an entity to plan for the loss of non-consequential load in the event of a single contingency."

Assigned: Project 2006-02 - Assess Transmission Future Needs

Status: In Ballot Delivery: 2011

Facilities Design, Connections and Maintenance Reliability Standards (Order 705)

DIRECTIVE: S- Ref 10601 - direct that any revised TPL Reliability Standards must reflect consistency in the lists of contingencies between the two

Para 49 and Footnote #38

"direct that any revised TPL Reliability Standards must reflect consistency in the lists of contingencies between the two"

Assigned: Project 2006-02 - Assess Transmission Future Needs

Project Report

Project 2006-06
Reliability Coordination

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10145 - Require a minimum set of tools for the RC

Para 905

"Further, consistent with the NOPR, the Commission directs the ERO to modify IRO-002-1 to require a minimum set of tools that must be made available to the reliability coordinator. We believe that this requirement will ensure that a reliability coordinator has the tools it needs to perform its functions. Further, as noted by Dominion, such a requirement promotes a more proactive approach to maintaining reliability."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10147 - Consider the suggestions of APPA, Entergy, and Xcel when doing so.

Para 914

"<From 693> Consider the suggestions of APPA, Entergy, and Xcel when doing so."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10146 - Create criteria to define the term critical facilities in a reliability coordinators area and its adjacent systems.

Para 914

"<From 693> Create criteria to define the term critical facilities in a reliability coordinators area and its adjacent systems."

Assigned: Project 2006-06 - Reliability Coordination

Status: Pending

DIRECTIVE: S- Ref 10144 - Consider commenters suggestions as part of the standards development process. 893. FirstEnergy suggests that NERC clarify whether Requirement R8, which requires entities to comply with a reliability coordinator directive unless such action

Para 897

"Consider commenters suggestions as part of the standards development process. 893. FirstEnergy suggests that NERC clarify whether Requirement R8, which requires entities to comply with a reliability coordinator directive unless such actions would violate safety, equipment or regulatory or statutory requirements, refers to personnel safety, equipment safety or both. In addition, it suggests the establishment of a chain of command so that, for example, if a generator receives conflicting instructions from a balancing authority and a transmission operator, it can determine which instruction governs.

Consider commenters suggestions as part of the standards development process. Paragraph 892. APPA supports the approval of the Reliability Standard but expresses concern that the Version 1 standard does not include Measures that correspond to Requirements R2 and R9. APPA emphasizes the need for Measures corresponding to Requirement R9, which requires the reliability coordinator to act in the interests of reliability for the overall reliability coordinator area and the Interconnection before the interests of any other entity. APPA supports Requirement R8 with the extended applicability, provided that applicability is

determined by reference to the NERC compliance registry. APPA agrees that the regional reliability organization should be eliminated as an applicable entity and suggests it be replaced with Regional Entities.

894. Requirement R3 provides that a reliability coordinator shall have clear decisionmaking authority to act and direct actions to be taken by applicable entities to preserve the integrity and reliability of the Bulk Electric System and these actions shall be taken without delay but no longer than 30 minutes. Santa Clara contends that some actions would require driving to a remote site and therefore, mandating completion of the required action within 30 minutes would be unreasonable. Thus, it recommends that NERC modify Requirement R3 to provide that actions shall commence without delay, but in any event shall commence within 30 minutes.

895. California Cogeneration comments that the Reliability Standard fails to address the operational limitations of QFs because they have contractual obligations to provide thermal energy to their industrial hosts. It contends that a QF can be directed to change operations only in the case of a system emergency, pursuant to 18 CFR 292.307."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10050 - Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. Entergy Paragraph 499. Entergy states that it is unclear what cyber assets are covered by COM-001-0. Entergy believes that the Reliability

Para 503/504

"Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. Entergy Paragraph 499. Entergy states that it is unclear what cyber assets are covered by COM-001-0. Entergy believes that the Reliability Standard should focus on telecommunications that support the operation of critical assets. Entergy also believes that COM-001-0 should be expanded to include advances in communications technology. It states that NERC should consider addressing the following in a way that will facilitate an understanding of the Reliability Standards requirements: (1) voice communications; (2) command and control data communications; (3) security coordination data communications; (4) digital messaging communications; (5) human linguistic convention and (6) other types of communications, including video conferencing and communications with remote security cameras. Entergy believes that this could be accomplished through an enhancement to the definition of communications in the NERC glossary and recasting COM-001-0 to improve the specificity of requirements for each form of communication. Finally,Entergy believes that Requirement R4 of COM-001-0, which requires reliability coordinators, transmission operators and balancing authorities to use English in all types of communications, should apply only to verbal and written communications."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10153 - Conduct a survey on IROL practices and actual operating experiences by requiring reliability coordinators to report any violations of IROLS, their causes, the date and time, the durations and magnitudes in which actual operations exceeds IR

Para 951

"Conduct a survey on IROL practices and actual operating experiences by requiring reliability coordinators to report any violations of IROLS, their causes, the date and time, the durations and magnitudes in which actual operations exceeds IROLs to NERC."

Assigned: Project 2006-06 - Reliability Coordination

Status: Filed Delivery: 2007

DIRECTIVE: S- Ref 10152 - Measures and levels of non-compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency, and causes of the violations and whether these occur during normal or contingency conditions. Paragraph 951. Ac

Para 951

"Measures and levels of non-compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency, and causes of the violations and whether these occur during normal or

contingency conditions. Paragraph 951. Accordingly, the Commission approves Reliability Standard IRO-005-1 asmandatory and enforceable. Further, because IRO-005-1 has no Measures or Levels ofNon-Compliance, pursuant to section 215(d)(5) of the FPA and 39.5(f) of ourregulations, the Commission directs the ERO to develop a modification to IRO-005-1through the Reliability Standards development process that includes Measures and Levelsof Non-Compliance. The Commission further directs that the Measures and Levels of Non-Compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency and causes of the violations and whether these occur during normal or contingency conditions."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10151 - Include measures and levels of non-compliance.

Para 951

"Include measures and levels of non-compliance."

Assigned: Project 2006-06 - Reliability Coordination

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10150 - Provide further clarification that reliability coordinators and transmission operators direct control actions, not LSEs as part of the standard development process. Paragraph 950. We do not share TAPS concern regarding LSEs initiating load

Para 950

"Provide further clarification that reliability coordinators and transmission operators direct control actions, not LSEs as part of the standard development process. Paragraph 950. We do not share TAPS concern regarding LSEs initiating load shedding as their own control action to respect IROLs or SOLs. The appropriate control actions to respect IROLs and SOLs are the responsibilities of a reliability coordinator and transmission operator. If load shedding is required, it is the responsibility of a reliability coordinator or a transmission operator to direct the appropriate entities including LSEs to carry it out. However, we urge the ERO to provide further clarification in this regard and include TAPS concern in developing the modification of this Reliability Standard."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10143 - Consider adding measures and levels of non-compliance. . Further, the Commission directs the ERO to consider adding Measures and Levels of Non-Compliance in the Reliability Standard as requested by APPA.

Para 897

"Consider adding measures and levels of non-compliance . . . Further, the Commission directs the ERO to consider adding Measures and Levels of Non-Compliance in the Reliability Standard as requested by APPA."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10142 - Eliminate the references to the regional reliability organization as an applicable entity. Paragraph 896. In the NOPR, the Commission proposed to approve the Reliability Standard as mandatory and enforceable. In addition, as a separate act

Para 896

"Eliminate the references to the regional reliability organization as an applicable entity. Paragraph 896. In the NOPR, the Commission proposed to approve the Reliability Standard as mandatory and enforceable. In addition, as a separate action under section 215(d)(5), the NOPR proposed to direct the ERO to develop modifications to Requirement R1291 to substitute Regional Entity for regional reliability organization and reflect NERCs Rules of Procedure for registering, certifying and verifying entities, including reliability coordinators. Commenters do not raise any concerns regarding the proposed action. Accordingly, for the reasons stated in the NOPR, the Commission approves IRO-001-1 as mandatory and enforceable. In addition, for the reasons discussed in the NOPR, the Commission directs the ERO to develop modifications

to the Reliability Standard through the Reliability Standards development process that reflect the process set forth in the NERC Rules of Procedures and eliminate the regional reliability organization as an applicable entity."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10049 - Specify requirements for using telecommunication facilities during normal and emergency conditions that reflect the roles of the applicable entities and their impact of reliable operation, and include adequate flexibility. Paragraph 490. I

Para 503

"Specify requirements for using telecommunication facilities during normal and emergency conditions that reflect the roles of the applicable entities and their impact of reliable operation, and include adequate flexibility. Paragraph 490. In response to SDG&E, the Commissions intent is not to subject generator operators and distribution providers to the same requirements placed on transmission operators. As part of the modification of this Reliability Standard or development of a new Reliability Standard to include the appropriate telecommunications facility requirements for generator operators and distribution providers, the ERO should take into account what would be required of generator operators and distribution providers in terms of telecommunications for the Reliable Operation of the Bulk-Power System, instead of applying the same requirements as are placed on other reliability entities such as reliability coordinators, balancing authorities and transmission operators."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- REf 10048 - Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. TAPS Paragraph 483. TAPS states that Requirement R1.4 has an ambiguous requirement that, if applied to distribution providers and generat

Para 491

"Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process. TAPS Paragraph 483. TAPS states that Requirement R1.4 has an ambiguous requirement that, if applied to distribution providers and generator operators, would impose redundancy requirements well beyond what is reasonably necessary for Bulk-Power System reliability. Further it asserts that the NOPR provides no basis for expanding the Reliability Standard to small entities, such as a 2-MW distribution provider or generator, much less than one that has no connection to the bulk transmission system. Finally, TAPS contends that, in making this proposal, the Commission is over-stepping its bounds by not leaving it to the EROs expert judgment whether COM-001-1 has sufficient coverage to protect Bulk-Power System reliability and states that, in any event, applicability should be limited through NERCs registry criteria and definition of bulk electric system."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10047 - Include generator operators and distribution providers in the list of applicable entities and create appropriate requirements for them. Paragraph 487. The Commission reaffirms its position that generator operators and distribution provider

Para 487

"Include generator operators and distribution providers in the list of applicable entities and create appropriate requirements for them. Paragraph 487. The Commission reaffirms its position that generator operators and distribution providers should be included as applicable entities in COM-001-1 to ensure there is no reliability gap during normal and emergency operations. For example, during a blackstart when normal communications may be disrupted, it is essential that the transmission operator, balancing authority and reliability coordinator maintain communications with their distribution providers and generator operators. However, the current version of Reliability Standard COM-001-1 does not require this because it does not include generator operators and distribution providers as applicable entities. We clarify that the NOPR did not propose to require redundancy on generator operators or distribution providers telecommunication facilities or that generator operators or distribution providers be trained on anything not

related to their functions during normal and emergency conditions. We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process."

Assigned: Project 2006-06 - Reliability Coordination

Status: In Drafting Delivery: 2011

Project Report

Project 2007-02
Operating Personnel Communications Protocols

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10051 - Although we direct that the regional reliability organization should not be the compliance monitor for NERCNet, we leave it to the ERO to determine whether it is the appropriate compliance monitor or if compliance should be monitored by the

Para 507

"Although we direct that the regional reliability organization should not be the compliance monitor for NERCNet, we leave it to the ERO to determine whether it is the appropriate compliance monitor or if compliance should be monitored by the Regional Entities for NERCNet User Organizations"

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10058 - Regarding APPAs suggestion that it may be beneficial to include communication protocols in the relevant Reliability Standard that governs those types of emergencies, we direct that it be addressed in the Reliability Standards Development pr

Para 533

"Regarding APPAs suggestion that it may be beneficial to include communication protocols in the relevant Reliability Standard that governs those types of emergencies, we direct that it be addressed in the Reliability Standards Development process."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

DIRECTIVE: S- Ref 10057 - Address Santa Clara, FirstEnergy, and Six Cities concerns in the reliability standards development process.

Para 539

"Address Santa Clara, FirstEnergy, and Six Cities concerns in the reliability standards development process."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

DIRECTIVE: S- Ref 10056 - Establish tightened communication protocols, especially for communications during alerts and emergencies. Establish uniformity to the extent practical on a continent-wide basis.

Para 531

"Establish tightened communication protocols, especially for communications during alerts and emergencies. Establish uniformity to the extent practical on a continent-wide basis."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10055 - Consider Xcels suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinators assessment and approval.

Para 523

"Consider Xcel's suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinators assessment and approval."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10054 - Include a requirement for the reliability coordinator to assess and approve only those actions that have impacts beyond the area views of the transmission operators and balancing authorities. Include how to determine whether an action need

Para 520

"Include a requirement for the reliability coordinator to assess and approve only those actions that have impacts beyond the area views of the transmission operators and balancing authorities. Include how to determine whether an action needs to be assessed by the reliability coordinator."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10053 - Address APPAs concern through the standard development process.

Para 515

"Address APPAs concern through the standard development process."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10052 - Include distribution providers in the list of applicable entities.

Para 512

"Include distribution providers in the list of applicable entities."

Assigned: Project 2007-02 - Operating Personnel Communications Protocols

Status: In Drafting Delivery: 2012

Project Report

Project 2007-03
Real-Time Transmission Operations

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10382 - Consider Santa Claras comments regarding changes to requirement R2 in the standards development process. (Santa Clara states that Requirement R2 of the Reliability Standard should be revised to include frequency monitoring in addition to th

Para 1639

"Consider Santa Claras comments regarding changes to requirement R2 in the standards development process. (Santa Clara states that Requirement R2 of the Reliability Standard should be revised to include frequency monitoring in addition to the monitoring of voltage, real and reactive power flows.)"

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10340 - Consider FirstEnergys and the California PUCs comments about the maximum time for corrective actions in the standards development process. 1428. California PUC contends that imposing a time restriction for returning a system to a stable sta

Para 1444

"Consider FirstEnergys and the California PUCs comments about the maximum time for corrective actions in the standards development process. 1428. California PUC contends that imposing a time restriction for returning a system to a stable state may cause more harm than good since additional information and options may be available as time elapses. It repeats its suggestion from its earlier comments on the Staff Preliminary Assessment and proposes the following alternative language: Transmission or generation operators shall carry out corrective control actions, i.e., returning the system to a stable state that respects system requirements as soon as possible, and no longer than 30 minutes, except where a longer response time is feasible, or where a longer response is demonstrated to produce a better ultimate solution without unacceptable interim risk. 1431. FirstEnergy contends that Requirement R2.1 essentially requires generator operators to report all protective relay or equipment failures, since generator operators may not be able to tell which failures will reduce system reliability. FirstEnergy suggests that R2.1 should be revised to require generator operators to report all equipment failures or outages. FirstEnergy further suggests that PRC-001-1 be revised to provide that if a company performs reasonable testing procedures, undiscoverable equipment failures will not be violations of R2.1."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10341 - Upon detection of failures in relays or protection system elements on the bulk power system that threaten reliability, relevant transmission operators must be informed promptly, but within a specified period of time. -- (2) a requirement t

Para 1445

"Upon detection of failures in relays or protection system elements on the bulk power system that threaten reliability, relevant transmission operators must be informed promptly, but within a specified period of time. -- (2) a requirement that transmission and generator operators be informed immediately upon the detection of failures in relays or protection system elements on the Bulk-Power System that would threaten reliable operation, so that these entities could carry out appropriate corrective control actions consistent with those used in mitigating IROL violations."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10343 - Para 1420. Once informed, transmission operators must carry out corrective control actions that return the system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes. 1440. [t]he transmissi

Para 1449

"1420. Once informed, transmission operators must carry out corrective control actions that return the system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes. 1440. [t]he transmission operator shall take corrective action as soon as possible refers to transmission operators taking operator control actions. It does not refer to troubleshooting, repairing or replacing failed relays or equipment, etc., since these time-consuming corrective actions would prolong the risk of cascading failures to the Bulk-Power System."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10366 - Consider Santa Claras comments on requirements R7.2 and R7.3 on transmission operator notification requirements as part of the standards development process.

Para 1588

"Consider Santa Claras comments on requirements R7.2 and R7.3 on transmission operator notification requirements as part of the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10367 - Consider adding other measures and levels of non-compliance.

Para 1580

"Consider adding other measures and levels of non-compliance."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10369 - Para 1608 - Next-day analysis for all IROLs must identify and communicate control actions to system operators that can be implemented within 30 minutes following a contingency.

Para 1601

"1608 - Next-day analysis for all IROLs must identify and communicate control actions to system operators that can be implemented within 30 minutes following a contingency."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10370 - Para 1608 - Requires next-day analysis of minimum voltages at nuclear power plants auxiliary power buses.

Para 1603

"1608 - Requires next-day analysis of minimum voltages at nuclear power plants auxiliary power buses."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10371 - Par 1608 - Requires simulation contingencies to match what will actually happen in the field.

Para 1604

"1608 - Requires simulation contingencies to match what will actually happen in the field."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10372 - Consider the comments of ISO-NE and the NRC with respect to requirement R12 and measure M7 as part of the standard development process.

Para 1607

"Consider the comments of ISO-NE and the NRC with respect to requirement R12 and measure M7 as part of the standard development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10376 - Para 1626 - Communicate scheduled outages to all affected entities well in advance to ensure reliability and accuracy of ATC calculations.

Para 1620

"1626 - Communicate scheduled outages to all affected entities well in advance to ensure reliability and accuracy of ATC calculations."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10377 - Para 1626 - Incorporate an appropriate lead time for planned outages using suggestions from the various commenters.

Para 1621

"1626 - Incorporate an appropriate lead time for planned outages using suggestions from the various commenters."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10378 - Consider TVAs suggestion for including breaker outages within the meaning of facilities that are subject to advance notice for planned outages.

Para 1622

"Consider TVAs suggestion for including breaker outages within the meaning of facilities that are subject to advance notice for planned outages."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10379 - Require any facility, that in the opinion of the reliability coordinator, balancing authority, or transmission operator, will have a direct impact on the reliability of the bulk power system be subject to the requirement R1 for planned outa

Para 1624

"Require any facility, that in the opinion of the reliability coordinator, balancing authority, or transmission operator, will have a direct impact on the reliability of the bulk power system be subject to the requirement R1 for planned outage coordination"

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10339 - Clarify the term corrective action. 1440. We believe that [t]he transmission operator shall take corrective action as soon as possible refers to transmission operators taking operator control actions. It does not refer to troubleshooting

Para 1441

"Clarify the term corrective action. 1440. We believe that [t]he transmission operator shall take corrective action as soon as possible refers to transmission operators taking operator control actions. It does not refer to troubleshooting, repairing or replacing failed relays or equipment, etc., since these time-consuming corrective actions would prolong the risk of cascading failures to the Bulk-Power System.
1441. We direct the ERO to clarify the term corrective action consistent with this discussion when it modifies PRC-001-1 in the Reliability Standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10389 - Para 1658 - Consider APPAs comments regarding missing measures in the standards development process.

Para 1664

"1658 - Consider APPAs comments regarding missing measures in the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10375 - Commenters did not take issue with the proposed interpretation of the term deliverability as the ability to deliver the output from generation resources to firm load without any reliability criteria violations for plausible generation dispa

Para 1606

"Commenters did not take issue with the proposed interpretation of the term deliverability as the ability to deliver the output from generation resources to firm load without any reliability criteria violations for plausible generation dispatches. The Commission adopts this proposed interpretation. In order to ensure the necessary clarity, the term as used in Requirement R7 of TOP-002-2 should be understood in this manner."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10368 - Clarify the definition of emergency and define the criteria for entering into the various states. Also define the authority for declaring these states.

Para 1585

"Clarify the definition of emergency and define the criteria for entering into the various states. Also define the authority for declaring these states."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10374 - Inform the nuclear plant operator in real-time if the auxiliary power bus voltages cannot be maintained.

Para 1603

"Inform the nuclear plant operator in real-time if the auxiliary power bus voltages cannot be maintained."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10373 - Address critical energy infrastructure confidentiality as part of the routine standard development process.

Para 1600

"Address critical energy infrastructure confidentiality as part of the routine standard development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10392 - Para 1678 - Consider APPAs comments regarding missing measures in the standards development process.

Para 1681

"1678 - Consider APPAs comments regarding missing measures in the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10380 - Para 1630 - Modify requirement R4 to state that the system should be restored to respect proven limits as soon as possible taking no more than 30 minutes.

Para 1636

"1630 - Modify requirement R4 to state that the system should be restored to respect proven limits as soon as possible taking no more than 30 minutes."

Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10390 - Para 1668 - Eliminate overlapping matters in TOP-007 and TOP-008.
Para 1672
"1668 - Eliminate overlapping matters in TOP-007 and TOP-008."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10381 - Para 1640 - Defines high risk conditions under which the system must be operated to respect multiple outages in requirement R3.
Para 1638
"1640 - Defines high risk conditions under which the system must be operated to respect multiple outages in requirement R3."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10388 - Para 1653 - Clarify the meaning of appropriate technical information concerning protective relays.
Para 1663
"1653 - Clarify the meaning of appropriate technical information concerning protective relays."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10386 - Consider FirstEnergys modifications to Attachment 1 and ISO-NEs recommended revision to requirement R4 in the standards development process. ISO-NE recommends that the reference to purchasing-selling entity in Requirement R4 should be repl
Para 1650
"Consider FirstEnergys modifications to Attachment 1 and ISO-NEs recommended revision to requirement R4 in the standards development process.

ISO-NE recommends that the reference to purchasing-selling entity in Requirement R4 should be replaced with generator owner, transmission owner, and

LSE."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10385 - Delete references to confidentiality agreements but ensure critical energy infrastructure confidentiality is addressed in the standards development process.
Para 1649
"Delete references to confidentiality agreements but ensure critical energy infrastructure confidentiality is addressed in the standards development process."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10384 - Para 1651 - Include information about the operational status of special protection systems and power system stabilizers in Attachment 1.
Para 1648
"1651 - Include information about the operational status of special protection systems and power system stabilizers in Attachment 1."
Assigned: Project 2007-03 - Real-Time Transmission Operations
Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10383 - Para 1628 - Perform a survey of the prevailing operating practices and actual operating experiences surrounding IROL limits.

Para 1637

"1628 - Perform a survey of the prevailing operating practices and actual operating experiences surrounding IROL limits."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

DIRECTIVE: S- Ref 10342 - Para 1445. In response to MidAmericans request that we clarify the term immediately in our proposed second directive, we direct the ERO, in the Reliability Standards development process, to determine the appropriate amount of time after the

Para 1445

"1445.In response to MidAmericans request that we clarify the term immediately in our proposed second directive, we direct the ERO, in the Reliability Standards development process, to determine the appropriate amount of time after the detection of relay failures, in which relevant transmission operators must be informed of such failures."

Assigned: Project 2007-03 - Real-Time Transmission Operations

DIRECTIVE: S- Ref 10391 - Para 1671 - Consider the NRCs comments on voltage requirements as part of the standards development process.

Para 1673

"1671 - Consider the NRCs comments on voltage requirements as part of the standards development process."

Assigned: Project 2007-03 - Real-Time Transmission Operations

Status: In Ballot Delivery: 2011

Project Report

Project 2007-06
System Protection Coordination

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10344 - Para's 1420 & 1449. Measures and levels of non-compliance incorrectly reference non-existent requirements.
Due 3/22/2013

Para 1446

"1420 & 1449. Measures and levels of non-compliance incorrectly reference non-existent requirements.

1420. In the NOPR, the Commission proposed to approve PRC-001-0 as mandatory and enforceable. In addition, the Commission proposed to direct NERC to submit modifications to PRC-001-0 (proposed directives) that included: (1) Measures and Levels of Non-Compliance...

1423. APPA states that while it agrees that PRC-001-1 is sufficient for approval, since the new Measures only partially address the Requirements, and in some cases refer to non-existent Requirements, no penalties should be levied for violations of Requirements that have no accompanying Measures.

1446. We agree with APPA that the added Measures and Levels of Non-Compliance incorrectly reference non-existent requirements. We direct the ERO to revise the references accordingly.

1449. The Commission approves Reliability Standard PRC-001-1 as mandatory and enforceable. In addition, the Commission directs the ERO to develop modifications to PRC-001-1 through the Reliability Standards development process that: (1) correct the references for Requirements and..."

Assigned: Project 2007-06 - System Protection Coordination

Status: In Drafting Delivery: 2013

Project Report

Project 2007-07
Vegetation Management

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10105 - FirstEnergy suggests that rights-of-way be defined to encompass the required clearance areas instead of the corresponding legal rights, and that the standards should not require clearing the entire right-of-way when the required clearance f

Para 734

"FirstEnergy suggests that rights-of-way be defined to encompass the required clearance areas instead of the corresponding legal rights, and that the standards should not require clearing the entire right-of-way when the required clearance for an existing line does not take up the entire right-of-way. The Commission believes this suggestion is reasonable and should be addressed by the ERO. Accordingly, the Commission directs the ERO to address this suggestion in the Reliability Standards development process."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10104 - Accordingly, the Commission directs the ERO to develop compliance audit procedures, using relevant industry experts, which would identify appropriate inspection cycles based on local factors. These inspection cycles are to be used in compl

Para 721

"Accordingly, the Commission directs the ERO to develop compliance audit procedures, using relevant industry experts, which would identify appropriate inspection cycles based on local factors. These inspection cycles are to be used in compliance auditing of FAC-003-1 by the ERO or Regional Entity to ensure such inspection cycles and vegetation management requirements are properly met by the responsible entities."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10103 - FirstEnergy and Xcel suggest that if the applicability of this Reliability Standard is expanded, the Commission should allow flexibility in complying with this Reliability Standard for lower-voltage facilities, or allow lower-voltage facili

Para 709

"FirstEnergy and Xcel suggest that if the applicability of this Reliability Standard is expanded, the Commission should allow flexibility in complying with this Reliability Standard for lower-voltage facilities, or allow lower-voltage facilities one year before the Reliability Standard is implemented. The ERO should consider these comments when determining when it would request that the modification of this Reliability Standard to go into effect.."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10102 - We recognize that many commenter's would like a more precise definition for the applicability of this Reliability Standard, and we direct the ERO to develop an acceptable definition that covers facilities that impact reliability but balance

Para 708

"We recognize that many commenter's would like a more precise definition for the applicability of this Reliability Standard, and we direct the ERO to develop an acceptable definition that covers facilities that

impact reliability but balances extending the applicability of this standard against unreasonably increasing the burden on transmission owners"

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10101 - Collect outage data for transmission outages of lines that cross both federal and non-federal lands, analyze it, and use the results to develop a standard that would apply to both federal and non-federal lands.

Para 732

"Collect outage data for transmission outages of lines that cross both federal and non-federal lands, analyze it, and use the results to develop a standard that would apply to both federal and non-federal lands."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10100 - Define the minimum clearance needed to avoid sustained vegetation-related outages that apply to line crossing federal and non-federal lands.

Para 732

"Define the minimum clearance needed to avoid sustained vegetation-related outages that apply to line crossing federal and non-federal lands."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10099 - Incorporate suggestions to include facilities at lower voltages that are associated with IROLs.

Para 706

"Incorporate suggestions to include facilities at lower voltages that are associated with IROLs."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

DIRECTIVE: S- Ref 10098 - Address the issue of bright-line applicability of 200 kV and above through the standards development process.

Para 706

"Address the issue of bright-line applicability of 200 kV and above through the standards development process."

Assigned: Project 2007-07 - Vegetation Management

Status: In Drafting Delivery: 2011

Project Report

Project 2007-09
Generator Verification

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10365 - Requires all generators to ride through the same set of category B and C contingencies as required by wind generators in Order No. 661, or to simulate without this capability as tripping.

Para 1787

"1787.In the NOPR, the Commission identified an implicit assumption in the TPL Reliability Standards that all generators are required to ride through the same types of voltage disturbances and remain in service after the fault is cleared. This implicit assumption should be made explicit. Commenters agree with the proposed requirement for all generators to ride through the same set of Category B and C events as required for wind generators. The Commission understands that NRC has both degraded voltage and loss of voltage requirements. The degraded voltage requirement allows the voltage at the auxiliary power system busses to go below the minimum value for a time frame that is usually much longer than normal fault clearing time. If a specific nuclear power plant has an NRC requirement that would force it to trip off-line if its auxiliary power system voltage was depressed below some minimum voltage, the simulation should include the tripping of the plant in addition to the faulted facilities. In this regard, the Commission agrees that NRC requirements should be used when implementing the Reliability Standards. Using NRC requirements as input will assure that there is consistency between the Reliability Standards and the NRC requirement that the system is accurately modeled. Accordingly, the Commission directs the ERO to modify the Reliability Standard to explicitly require either that all generators are capable of riding through the same set of Category B and C contingencies, as required by wind generators in Order No. 661, or that those generators that cannot ride through be simulated as tripping. If a generator trips due to low voltage from a single contingency, the initial trip of the faulted element and the resulting trip of the generator would be governed by Category B contingencies and performance criteria."

Assigned: Project 2007-09 - Generator Verification

DIRECTIVE: S- Ref 10318 - Similarly, we respond to Constellation that any modification of the Levels of Non-Compliance in this Reliability Standard should be reviewed in the ERO Reliability Standards development process.

Para 1310

"Similarly, we respond to Constellation that any modification of the Levels of Non-Compliance in this Reliability Standard should be reviewed in the ERO Reliability Standards development process."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10321 - Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred.

Para 1320

"Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10320 Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net reactive power capability verification within 30 calendar days of approval. The confusion centers on approval and when the

Para 1322

"Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net reactive power capability verification within 30 calendar days of approval. The confusion centers on approval and when the 30-day period starts."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10319 - Require verification of reactive power capability at multiple points over a units operating range.

Para 1321

"Require verification of reactive power capability at multiple points over a units operating range."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10317 - Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred.

Para 1308

"Provide a work plan and compliance filing regarding the collection of information specified for standards that are deferred."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10316 - Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net real power capability verification within 30 calendar days of approval. The confusion centers on approval and when the 3

Para 1311

"Clarify requirement R2 that specifies that the regional reliability organization shall provide generator gross and net real power capability verification within 30 calendar days of approval. The confusion centers on approval and when the 30-day period starts."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10315 - Document test conditions and the relationships between test conditions and generator output so that the amount of power that can be expected to be delivered from a generator at different conditions can be determined.

Para 1310

"Document test conditions and the relationships between test conditions and generator output so that the amount of power that can be expected to be delivered from a generator at different conditions can be determined."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

DIRECTIVE: S- Ref 10314 - Require users, owners, and operators of the system to provide this information.

Para 1312

"Require users, owners, and operators of the system to provide this information."

Assigned: Project 2007-09 - Generator Verification

Status: In Drafting Delivery: 2013

Project Report

Project 2007-12
Frequency Response

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: Ref 10021 - Modify BAL-003 to include Levels of Non-Compliance

Para 375

"Modify BAL-003 to include Levels of Non-Compliance"

Assigned: Project 2007-12 - Frequency Response

Status: Filed Delivery: 2008

DIRECTIVE: Ref 10017 - Define the necessary amount of frequency response needed for reliable operation for each balancing authority with methods of obtaining and measuring that the frequency response is achieved.

Due 5/31/2012

Para 372

"Define the necessary amount of frequency response needed for reliable operation for each balancing authority with methods of obtaining and measuring that the frequency response is achieved."

Assigned: Project 2007-12 - Frequency Response

Status: In Drafting Delivery: 2011

DIRECTIVE: Ref 10016 -Determine the appropriate periodicity of frequency response surveys necessary to ensure requirement R2 and other requirements are being met; also modify measure M1 based on this determination.

Due 5/31/2012

Para 369

"Determine the appropriate periodicity of frequency response surveys necessary to ensure requirement R2 and other requirements are being met; also modify measure M1 based on this determination."

Assigned: Project 2007-12 - Frequency Response

Status: In Drafting Delivery: 2011

Order Setting Deadline for Compliance

DIRECTIVE: S- Ref 10032 - Para 14 .... the Commission directs NERC to submit, within six months from the date of issuance of this order, a modification to BAL-003-0 that complies with the Commissions directives as set forth in Order No. 693.

Para 14

"14.Pursuant to section 39.5(g) of the Commissions regulations, the Commission directs NERC to submit, within six months from the date of issuance of this order, a modification to BAL-003-0 that complies with the Commissions directives as set forth in Order No. 693:

(1) Determine an appropriate periodicity of frequency response surveys necessary to ensure that Requirement R2 and other requirements of the Reliability Standard are being met.

(2) Define the necessary amount of frequency response needed for reliable operation for each balancing authority with methods of obtaining and measuring that the frequency response is achieved."

Assigned: Project 2007-12 - Frequency Response

Status: Regulator Approved Delivery: 2010

DIRECTIVE: While the Commission, in Order No. 693, did not set a deadline for submitting modifications to BAL-003-0, we note that almost three years have passed since the issuance of the directive in Order No. 693. Accordingly, pursuant to section 39.5(g) of the Com

Due 5/31/2012

Para 2

"While the Commission, in Order No. 693, did not set a deadline for submitting modifications to BAL-003-0, we note that almost three years have passed since the issuance of the directive in Order No. 693. Accordingly, pursuant to section 39.5(g) of the Commissions regulations, the Commission directs NERC to submit a modification to BAL-003-0 that is responsive to the Commissions directive in Order No. 693 within six months from the date of issuance of this order ... (1) Determine an appropriate periodicity of frequency response surveys necessary to ensure that Requirement R2 and other requirements of the Reliability Standard are being met."

Assigned: Project 2007-12 - Frequency Response

Status: Regulator Approved Delivery: 2010

Order Granting Rehearing for Further Consideration and Scheduling Technical Conference

DIRECTIVE: Direct that NERC submit, within 30 days after the technical conference, a proposed schedule that includes firm deadlines for completing studies, analyses needed to develop a frequency response requirement, and for submission of a modified Reliability Stan

Due 3/8/2011

Para 2

"direct that NERC submit, within 30 days after the technical conference, a proposed schedule that includes firm deadlines for completing studies, analyses needed to develop a frequency response requirement, and for submission of a modified Reliability Standard that is responsive to the Commission directives in Order No. 693 pertaining to Reliability Standard BAL-003-0. The Commission will provide notice and opportunity to comment on the proposed schedule, as well as other matters discussed at the technical conference. In the meantime, we will defer the six month compliance deadline set forth in the March 18 Order pending further order by the Commission."

Assigned: Project 2007-12 - Frequency Response

Status: Regulator Approved Delivery: 2010

Project Report

Project 2007-17
Protection System Maintenance and Testing

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10358 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.
Due 4/10/2012

Para 1516

"1516. The Commission believes that the proposal is presently part of the process. The Commission approves Reliability Standard PRC-011-0 as mandatory and enforceable. In addition, the Commission directs the ERO to submit a modification to PRC-011-0 through the Reliability Standards development process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System."

Assigned: Project 2007-17 - Protection System Maintenance and Testing
Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10355 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.
Due 4/10/2012

Para 1492

"1492. In addition, the Commission directs the ERO to develop a modification to PRC-008-0 through the Reliability Standards development process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System."

Assigned: Project 2007-17 - Protection System Maintenance and Testing
Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10363 - Require that documentation identified in requirement R2 be routinely provided to NERC or the regional entity. that includes: (1) and (2) a requirement that documentation identified in Requirement R2 shall be routinely provided to the ERO
Due 12/31/2014

Para 1546

"Require that documentation identified in requirement R2 be routinely provided to NERC or the regional entity. that includes: (1) and (2) a requirement that documentation identified in Requirement R2 shall be routinely provided to the ERO or Regional Entity"

Assigned: Project 2007-17 - Protection System Maintenance and Testing
Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10362 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system.

Para 1546

"Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10352 - Consider FirstEnergys and ISO-NEs suggestions to combine PRC-005, PRC-008, PRC-011, and PRC-017 into a single standard.

Para 1475

"Consider FirstEnergys and ISO-NEs suggestions to combine PRC-005, PRC-008, PRC-011, and PRC-017 into a single standard."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

DIRECTIVE: S- Ref 10351 - Maintenance and testing of a protection system must be carried out within a maximum allowable time interval that is appropriate for the type of protection system and its impact on the reliability of the bulk power system. 1

Due 4/10/2012

Para 1475

"1475. In addition, for the reasons discussed in the NOPR, the Commission directs the ERO to develop a modification to PRC-005-1 through the Reliability Standardsdevelopment process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System."

Assigned: Project 2007-17 - Protection System Maintenance and Testing

Status: In Ballot Delivery: 2012

Project Report

Project 2008-06
Cyber Security - Order 706

Directives -

Mandatory Reliability Standards for Critical Infrastructure Protection (Order 706)

DIRECTIVE: S- Ref 10492 - The Commission adopts the CIP NOPRs proposal to direct the ERO to develop a requirement that each responsible entity must implement a defensive security approach including two or more defensive measures in a defense in depth posture when constructing an electronic security perimeter

Due 6/29/2012

Para 496

"The Commission adopts the CIP NOPRs proposal to direct the ERO to develop a requirement that each responsible entity must implement a defensive security approach including two or more defensive measures in a defense in depth posture when constructing an electronic security perimeter"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10445 - NERC is directed to develop a timetable for development of the modifications to the CIP Reliability Standards and, if warranted, to develop and file with the Commission for approval, a second implementation plan.

Para 013

"NERC is directed to develop a timetable for development of the modifications to the CIP Reliability Standards and, if warranted, to develop and file with the Commission for approval, a second implementation plan."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10447 - The Commission directs the ERO to develop modifications to the CIP Reliability Standards that require a responsible entity to implement plans, policies and procedure that it must develop pursuant to the CIP Reliability Standards.

Para 075

"We direct the ERO to develop modifications to the CIP Reliability Standards that require a responsible entity to implement plans, policies and procedure that it must develop pursuant to the CIP Reliability Standards"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10560 - We direct the ERO to submit a work plan for Commission approval for developing and filing for approval the modifications to the CIP Reliability Standards that we are directing in this Final Rule

Para 089

"We direct the ERO to submit a work plan for Commission approval for developing and filing for approval the modifications to the CIP Reliability Standards that we are directing in this Final Rule"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2008

DIRECTIVE: S- Ref 10563 - The Commission adopts the CIP NOPR proposals and directs NERC to modify the CIP Reliability Standards through the Reliability Standards development process to remove the first two Terms [reasonable business judgment, and acceptance of risk], and develop

Para 106

"The Commission adopts the CIP NOPR proposals and directs NERC to modify the CIP Reliability Standards through the Reliability Standards development process to remove the first two Terms [reasonable business judgment, and acceptance of risk], and develop specific conditions that a responsible entity must satisfy to invoke the technical feasibility exception"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10564 - The Commission directs the ERO to develop modifications to the CIP Reliability Standards that do not include this term. We note that many commenters, including NERC, agree that the reasonable business judgment language should be removed based largely on

Para 128

"The Commission directs the ERO to develop modifications to the CIP Reliability Standards that do not include this term. We note that many commenters, including NERC, agree that the reasonable business judgment language should be removed based largely on the rationale articulated by the Commission in the CIP NOPR."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10565 - Tthe Commission directs the ERO to modify the CIP Reliability Standards through its Reliability Standards development process to remove references to reasonable business judgment before compliance audits begin.

Para 138

"the Commission directs the ERO to modify the CIP Reliability Standards through its Reliability Standards development process to remove references to reasonable business judgment before compliance audits begin."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10566 - The Commission, therefore, directs the ERO to remove acceptance of risk language from the CIP Reliability Standards.

Para 150

"The Commission, therefore, directs the ERO to remove acceptance of risk language from the CIP Reliability Standards."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10567 - The Commission directs the ERO to develop through its Reliability Standards development process revised CIP Reliability Standards that eliminate references to acceptance of risk.

Para 156

"the Commission directs the ERO to develop through its Reliability Standards development process revised CIP Reliability Standards that eliminate references to acceptance of risk."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10579 - The Commission adopts its CIP NOPR proposal and directs the ERO to develop, pursuant to its Reliability Standards development process, a modification to CIP-002-1 to explicitly require that a senior manager annually review and approve the risk-based ass

Para 294

"The Commission adopts its CIP NOPR proposal and directs the ERO to develop, pursuant to its Reliability Standards development process, a modification to CIP-002-1 to explicitly require that a senior manager annually review and approve the risk-based assessment methodology."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10580 - The Commission adopts its CIP NOPR interpretation that Requirement R2 of CIP-003-1 requires the designation of a single manager who has direct and comprehensive responsibility and accountability for implementation and ongoing compliance with the CIP Rel

Para 381

"The Commission adopts its CIP NOPR interpretation that Requirement R2 of CIP-003-1 requires the designation of a single manager who has direct and comprehensive responsibility and accountability for implementation and ongoing compliance with the CIP Reliability Standards"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10474 - The Commission directs the ERO to develop modifications to Requirement R6 of CIP-003-1 to provide an express acknowledgment of the need for the change control and configuration management process to consider accidental consequences and malicious actions along with intentional changes.

Due 6/29/2012

Para 397 and 398

"The Commission directs the ERO to develop modifications to Requirement R6 of CIP-003-1 to provide an express acknowledgment of the need for the change control and configuration management process to consider accidental consequences and malicious actions along with intentional changes."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10481 - We also direct the ERO to identify the parameters of such exceptional circumstances through the Reliability Standards development process

Para 443

"The Commission adopts with modifications the proposal to direct the ERO to modify Requirement R3 of CIP-004-1 to provide that newly-hired personnel and vendors should not have access to critical cyber assets prior to the satisfactory completion of a personnel risk assessment, except in specified circumstances such as an emergency."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10590 - The Commission adopts the CIP NOPR proposal to direct the ERO to revise 43 Violation Risk Factors.

Para 767

"The Commission adopts the CIP NOPR proposal to direct the ERO to revise 43 Violation Risk Factors."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10493 - The Commission directs that a responsible entity must implement two or more distinct security measures when constructing an electronic security perimeter, the specific requirements should be developed in the Reliability Standards development process.

Due 6/29/2012

Para 502

"The Commission directs that a responsible entity must implement two or more distinct security measures when constructing an electronic security perimeter, the specific requirements should be developed in the Reliability Standards development process."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10587 - We direct the ERO to revise Requirement R9 to state that the changes resulting from modifications to the system or controls shall be documented quicker than 90 calendar days.

Para 651

"We direct the ERO to revise Requirement R9 to state that the changes resulting from modifications to the system or controls shall be documented quicker than 90 calendar days."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10589 - Consistent with the Violation Risk Factor Order, the Commission directs NERC to submit a complete Violation Risk Factor matrix encompassing each Commission approved CIP Reliability Standard.

Para 759

"Consistent with the Violation Risk Factor Order, the Commission directs NERC to submit a complete Violation Risk Factor matrix encompassing each Commission approved CIP Reliability Standard."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10588 - Therefore, we will not allow NERC to reconsider the Violation Risk Factor designations in this instance but, rather, direct below that NERC make specific modifications to its designations.

Para 757

"Therefore, we will not allow NERC to reconsider the Violation Risk Factor designations in this instance but, rather, direct below that NERC make specific modifications to its designations."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10588 - The Commission adopts the CIP NOPR proposal to direct the ERO to modify Requirement R3 of CIP-009-1 to shorten the timeline for updating recovery plans.

Para 731

"The Commission adopts the CIP NOPR proposal to direct the ERO to modify Requirement R3 of CIP-009-1 to shorten the timeline for updating recovery plans."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10555 - The Commission adopts, with modifications, the CIP NOPR proposal to develop modifications to CIP-009-1 through the Reliability Standards development process to require an operational exercise once every three years (unless an actual incident occurs, in which case it may suffice), but to permit reliance on table-top exercises annually in other years.

Para 725

"The Commission adopts, with modifications, the CIP NOPR proposal to develop modifications to CIP-009-1 through the Reliability Standards development process to require an operational exercise once every three years (unless an actual incident occurs, in which case it may suffice), but to permit reliance on table-top exercises annually in other years."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10582 - The Commission adopts the CIP NOPRs proposal and directs the ERO to develop a modification to CIP-004-1 that would require affected personnel to receive required training before obtaining access to critical cyber assets (rather than within 90 days of ac

Para 431

"The Commission adopts the CIP NOPRs proposal and directs the ERO to develop a modification to CIP-004-1 that would require affected personnel to receive required training before obtaining access to critical cyber assets (rather than within 90 days of access authorization), but allowing limited exceptions, such as during emergencies, subject to documentation and mitigation."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10553 - The Commission adopts, with clarification, the CIP NOPR proposal to direct the ERO to modify CIP-009-1 to incorporate use of good forensic data collection practices and procedures into this CIP Reliability Standard.

Para 706

"The Commission adopts, with clarification, the CIP NOPR proposal to direct the ERO to modify CIP-009-1 to incorporate use of good forensic data collection practices and procedures into this CIP Reliability Standard."

Assigned: Project 2008-06 - Cyber Security - Order 706

DIRECTIVE: S- Ref 10494 - The Commission is directing the ERO to revise the Reliability Standard to require two or more defensive measures.

Due 6/29/2012

Para 503

"The Commission is directing the ERO to revise the Reliability Standard to require two or more defensive measures."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10536 - The Commission adopts its proposal to direct the ERO to provide more direction on what features, functionality, and vulnerabilities the responsible entities should address when conducting the vulnerability assessments, and to revise Requirement R8.4 to require an entity-imposed timeline for completion of the already-required action plan.

Para 643

"The Commission adopts its proposal to direct the ERO to provide more direction on what features, functionality, and vulnerabilities the responsible entities should address when conducting the vulnerability assessments, and to revise Requirement R8.4 to require an entity-imposed timeline for completion of the already-required action plan."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10586 - Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirement R4.2

Para 622

"Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirement R4.2"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10585 - Commission therefore directs the ERO to revise Requirement R3 to remove the acceptance of risk language and to impose the same conditions and reporting requirements as imposed elsewhere in the Final Rule regarding technical feasibility.

Para 600

"Commission therefore directs the ERO to revise Requirement R3 to remove the acceptance of risk language and to impose the same conditions and reporting requirements as imposed elsewhere in the Final Rule regarding technical feasibility."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S- Ref 10584 - Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirements R2.3 and R3.2.

Para 597

"Therefore, the Commission directs the ERO to eliminate the acceptance of risk language from Requirements R2.3 and R3.2."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed *Delivery: 2009*

DIRECTIVE: S- Ref 10514 - The Commission adopts the CIP NOPR proposal to direct the ERO to modify this CIP Reliability Standard to state that a responsible entity must, at a minimum, implement two or more different security procedures when establishing a physical security perimeter around critical cyber assets.

Para 572

"The Commission adopts the CIP NOPR proposal to direct the ERO to modify this CIP Reliability Standard to state that a responsible entity must, at a minimum, implement two or more different security procedures when establishing a physical security perimeter around critical cyber assets."

Assigned: Project 2008-06 - Cyber Security - Order 706

DIRECTIVE: S- Ref 10513 - we direct the ERO to modify Requirement R4 to require these representative active vulnerability assessments at least once every three years, with subsequent annual paper assessments in the intervening years

Due 6/29/2012

Para 547

"we direct the ERO to modify Requirement R4 to require these representative active vulnerability assessments at least once every three years, with subsequent annual paper assessments in the intervening years"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting *Delivery: 2012*

DIRECTIVE: S- Ref 10554 - Therefore, we direct the ERO to revise CIP-009-1 to require data collection, as provided in the Blackout Report.

Para 710 and 706

"Therefore, we direct the ERO to revise CIP-009-1 to require data collection, as provided in the Blackout Report."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: In Drafting *Delivery: 2012*

Order Approving Revised Reliability Standards for Critical Infrastructure Protection and Requiring Compliance Filing

DIRECTIVE: S-the Commission directs the ERO to develop a modification to Reliability Standard CIP-006-2, through the NERC Reliability Standards development process, to add a requirement on visitor control programs, including the use of visitor logs to document entry

Para 30

"the Commission directs the ERO to develop a modification to Reliability Standard CIP-006-2, through the NERC Reliability Standards development process, to add a requirement on visitor control programs, including the use of visitor logs to document entry and exit"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed *Delivery: 2009*

DIRECTIVE: S-We direct NERC to submit as part of the compliance filing required by this order an update of the timetable that reflects the plan to address remaining Commission directives from Order No. 706.

Para 44

"We direct NERC to submit as part of the compliance filing required by this order an update of the timetable that reflects the plan to address remaining Commission directives from Order No. 706."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed *Delivery: 2009*

DIRECTIVE: S-We direct NERC to submit, within 90 days of the date of issuance of this order, a compliance filing that includes a revised Version 2 Implementation Plan, addressing the Version 2 CIP Reliability Standards, that clarifies the matters specified in the at

Para 41

"We direct NERC to submit, within 90 days of the date of issuance of this order, a compliance filing that includes a revised Version 2 Implementation Plan, addressing the Version 2 CIP Reliability Standards, that clarifies the matters specified in the attachment to this order."

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

DIRECTIVE: S-the Commission directs the ERO to develop a modification to Reliability Standard CIP-008-2, Requirement R1.6, through the NERC Reliability Standards development process, to remove the last sentence of CIP-008-2 Requirement R1.6

Para 38

"the Commission directs the ERO to develop a modification to Reliability Standard CIP-008-2, Requirement R1.6, through the NERC Reliability Standards development process, to remove the last sentence of CIP-008-2 Requirement R1.6"

Assigned: Project 2008-06 - Cyber Security - Order 706

Status: Filed Delivery: 2009

Project Report

Project 2009-01
Disturbance and Sabotage Reporting

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10079 - Para 617 .... the Commission directs the ERO to develop a modification to EOP-004-1 through the Reliability Standards development process that includes any Requirements necessary for users, owners and operators of the Bulk-Power System to

Para 617

"617.While the Commission has identified concerns with regard to EOP-004-1, we believe that the proposal serves an important purpose in establishing requirements for reporting and analysis of system disturbances. Accordingly, the Commission approves Reliability Standard EOP-004-1 as mandatory and enforceable. In addition, pursuant to section 215(d)(5) of the FPA and 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to EOP-004-1 through the Reliability Standards development process that includes any Requirements necessary for users, owners and operators of the Bulk-Power System to provide data that will assist NERC in the investigation of a blackout or disturbance."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10078 - The ERO should consider this issue (APPA) through the Reliability Standards development process

Para 616

"The ERO should consider this issue (APPA) through the Reliability Standards development process"

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10077 - The Commission directs the ERO to consider all comments (Xcel) in future modifications of the Reliability Standard through the Reliability Standards development process.

Para 615

"The Commission directs the ERO to consider all comments (Xcel) in future modifications of the Reliability Standard through the Reliability Standards development process."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10046 - Modify CIP-001-1 to require an applicable entity to contact appropriate governmental authorities in the event of sabotage within a specific period of time, even if it is a preliminary report.

Para 470

"Modify CIP-001-1 to require an applicable entity to contact appropriate governmental authorities in the event of sabotage within a specific period of time, even if it is a preliminary report."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10076 - Consider APPAs concern about generator operators and LSEs analyzing performance of their equipment and provide data and information on the equipment to assist others with analysis. Paragraph 607. APPA is concerned about the scope of Requir

Para 612

"Consider APPAs concern about generator operators and LSEs analyzing performance of their equipment and provide data and information on the equipment to assist others with analysis. Paragraph 607. APPA is concerned about the scope of Requirement R2 because, in its opinion, Requirement R2 appears to impose an open-ended obligation on entities such as generation operators and LSEs that may have neither the data nor the tools to promptly analyze disturbances that could have originated elsewhere. APPA proposes that Requirement R2 be modified to require affected entities to promptly begin analyses to ensure timely reporting to NERC and DOE."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10075 - Paragraph 618. requirement R3 addresses the reporting of disturbances to the regional reliability organizations and NERC. The Commission directs the ERO to change its Rules of Procedure to assure that the Commission also receives these repo

Para 618

"Paragraph 618. requirement R3 addresses the reporting of disturbances to the regional reliability organizations and NERC. The Commission directs the ERO to change its Rules of Procedure to assure that the Commission also receives these reports within the same time frames as DOE."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10044 - We direct the ERO to explore ways to address these concerns including central coordination of sabotage reports and a uniform reporting format in developing modifications to the Reliability Standard with the appropriate governmental agenci

Para 469

"We direct the ERO to explore ways to address these concerns including central coordination of sabotage reports and a uniform reporting format in developing modifications to the Reliability Standard with the appropriate governmental agencies that have levied the reporting requirements."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10043 - Include a requirement to report a sabotage event to the proper government authorities. Develop the language to specifically implement this directive. Paragraph 467. CIP-001-1, Requirement R4, requires that each applicable entity establish

Para 468

"Include a requirement to report a sabotage event to the proper government authorities. Develop the language to specifically implement this directive. Paragraph 467. CIP-001-1, Requirement R4, requires that each applicable entity establish communications contacts, as applicable, with the local FBI or Royal Canadian Mounted Police officials and develop reporting procedures as appropriate to its circumstances. The Commission in the NOPR expressed concern that the Reliability Standard does not require an applicable entity to actually contact the appropriate governmental or regulatory body in the event of sabotage. Therefore, the Commission proposed that NERC modify the Reliability Standard to require an applicable entity to contact appropriate federal authorities, such as the Department of Homeland Security, in the event of sabotage within a specified period of time.212 468. As mentioned above, NERC and others object to the wording of the proposed directive as overly prescriptive and note that the reference to appropriate federal authorities fails to recognize the international application of the Reliability Standard. The example of the Department of Homeland Security as an appropriate federal authority was not intended to be an exclusive designation. Nonetheless, the Commission agrees that a reference to federal authorities could create confusion. Accordingly, we modify the direction in the NOPR and now direct the ERO to address our underlying concern regarding mandatory reporting of a sabotage event. The EROs Reliability Standards development process should develop the language to implement this directive."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10042 - The Commission affirms the NOPR directive and directs the ERO to incorporate a periodic review or updating of the sabotage reporting procedures and for the periodic testing of the sabotage reporting procedures. At this time, the Commission

Para 466

"The Commission affirms the NOPR directive and directs the ERO to incorporate a periodic review or updating of the sabotage reporting procedures and for the periodic testing of the sabotage reporting procedures. At this time, the Commission does not specify a review period as suggested by FirstEnergy and MRO and, rather, believes that the appropriate period should be determined through the EROs Reliability Standards development process. However, the Commission directs that the ERO begin this process by considering a staggered schedule of annual testing of the procedures with modifications made when warranted formal review of the procedures every two or three years."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10041 - Consider FirstEnergys suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality. Paragraph 451. A number of commenters agree with the Commissions concern that the term sabotage needs to

Para 462

"Consider FirstEnergys suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality. Paragraph 451. A number of commenters agree with the Commissions concern that the term sabotage needs to be better defined and guidance provided on the triggering events that would cause an entity to report an event. FirstEnergy states that this definition should differentiate between cyber and physical sabotage and should exclude unintentional operator error. It advocates a threshold of materiality to exclude acts that do not threaten to reduce the ability to provide service or compromise safety and security. SoCal Edison states that clarification regarding the meaning of sabotage and the triggering event for reporting would be helpful and prevent over-reporting."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10040 - Define sabotage and provide guidance on triggering events that would cause an entity to report an event. Paragraph 461. Several commenters agree with the Commissions concern that the term sabotage should be defined. For the reasons stated

Para 461

"Define sabotage and provide guidance on triggering events that would cause an entity to report an event. Paragraph 461. Several commenters agree with the Commissions concern that the term sabotage should be defined. For the reasons stated in the NOPR, we direct that the ERO further define the term and provide guidance on triggering events that would cause an entity to report an event. However, we disagree with those commenters that suggest the term sabotage is so vague as to justify a delay in approval or the application of monetary penalties. As explained in the NOPR, we believe that the term sabotage is commonly understood and that common understanding should suffice in most instances"

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

DIRECTIVE: S- Ref 10039 - Consider the need for wider application of the standard. Consider whether separate, less burdensome requirements for smaller entities may be appropriate. Paragraph 458. The Commission acknowledges the concerns of the commenters about the

Para 460

"Consider the need for wider application of the standard. Consider whether separate, less burdensome requirements for smaller entities may be appropriate. Paragraph 458. The Commission acknowledges the concerns of the commenters about the applicability of CIP-001-1 to small entities and has addressed the concerns of small entities generally earlier in this Final Rule. Our approval of the ERO Compliance Registry criteria to determine which users, owners and operators are responsible for compliance addresses the concerns of APPA and others. 459. However, the Commission believes that there are specific reasons for applying this Reliability Standard to such entities, as discussed in the NOPR. APPA indicates that some small LSEs do not own or operate hard assets that are normally thought of as at risk to sabotage. The

Commission is concerned that, an adversary might determine that a small LSE is the appropriate target when the adversary aims at a particular population or facility. Or an adversary may target a small user, owner or operator because it may have similar equipment or protections as a larger facility, that is, the adversary may use an attack against a smaller facility as a training exercise. The knowledge of sabotage events that occur at any facility (including small facilities) may be helpful to those facilities that are traditionally considered to be the primary targets of adversaries as well as to all members of the electric sector, the law enforcement community and other critical infrastructures. 460. For these reasons, the Commission remains concerned that a wider application of CIP-001-1 may be appropriate for Bulk-Power System reliability. Balancing these concerns with our earlier discussion of the applicability of Reliability Standards to smaller entities, we will not direct the ERO to make any specific modification to CIP-001-1 to address applicability. However, we direct the ERO, as part of its Work Plan, to consider in the Reliability Standards development process, possible revisions to CIP-001-1 that address our concerns regarding the need for wider application of the Reliability Standard. Further, when addressing such applicability issues, the ERO should consider whether separate, less burdensome requirements for smaller entities may be appropriate to address these concerns."

Assigned: Project 2009-01 - Disturbance and Sabotage Reporting

Status: In Drafting Delivery: 2012

Project Report

Project 2010-05.1
Phase 1 of Protection Systems: Misoperations

Directives -

Mandatory Reliability Standards for the Bulk-Power System (Order 693)

DIRECTIVE: S- Ref 10350 - The regional entity should develop procedures for corrective action plans.

Para 1469

"The regional entity should develop procedures for corrective action plans."

Assigned: Project 2010-05.1 - Phase 1 of Protection Systems: Misoperations

DIRECTIVE: S- Ref 10349 - Consider ISO-NEs suggestion that LSEs and transmission operators should be listed as applicable entities.

Para 1469

"Consider ISO-NEs suggestion that LSEs and transmission operators should be listed as applicable entities."

Assigned: Project 2010-05.1 - Phase 1 of Protection Systems: Misoperations

Project Report

Project 2010-13
Relay Loadability Order

Directives -

Transmission Relay Loadability Reliability Standard (Order 733)

DIRECTIVE: S-direct the ERO to modify sub-requirement R1.10 so that it requires entities to verify that the limiting piece of equipment is capable of sustaining the anticipated overload for the longest clearing time associated with the fault.

Para 203

"direct the ERO to modify sub-requirement R1.10 so that it requires entities to verify that the limiting piece of equipment is capable of sustaining the anticipated overload for the longest clearing time associated with the fault."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-and direct the ERO to modify PRC-023-1 to apply an add in approach to certain sub-100 kV facilities that Regional Entities have already identified or will identify in the future as critical facilities for the purposes the Compliance Registry.

Para 47

"and direct the ERO to modify PRC-023-1 to apply an add in approach to certain sub-100 kV facilities that Regional Entities have already identified or will identify in the future as critical facilities for the purposes the Compliance Registry."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to identify all critical facilities.

Para 50

"we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to identify all critical facilities."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-and direct the ERO to modify PRC-023-1 to apply an add in approach to sub-100 kV facilities that are owned or operated by currently-Registered Entities or entities that become Registered Entities in the future, and are associated with a facility that is

Para 60

"and direct the ERO to modify PRC-023-1 to apply an add in approach to sub-100 kV facilities that are owned or operated by currently-Registered Entities or entities that become Registered Entities in the future, and are associated with a facility that is included on a critical facilities list defined by the Regional Entity."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-We also direct that additions to the Regional Entities critical facility list be tested for their applicability to PRC-023-1 and made subject to the Reliability Standard as appropriate.

Para 60

"We also direct that additions to the Regional Entities critical facility list be tested for their applicability to PRC-023-1 and made subject to the Reliability Standard as appropriate."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to determine whether a sub-200 kV facility is critical to the reliability of the Bulk-Power System.

Para 69

"we direct the ERO to modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to determine whether a sub-200 kV facility is critical to the reliability of the Bulk-Power System."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to file its test, and the results of applying the test to a representative sample of utilities from each of the three Interconnections, for Commission approval no later than one year from the date of this Final Rule.

Para 69

"direct the ERO to file its test, and the results of applying the test to a representative sample of utilities from each of the three Interconnections, for Commission approval no later than one year from the date of this Final Rule."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-the ERO must develop a test that: (a) defines expectations of desirable system performance; and (b) describes the steady state and dynamic base cases that the planning coordinator must use in its assessments to carry out Requirement R3. The goal of the

Para 80

"the ERO must develop a test that: (a) defines expectations of desirable system performance; and (b) describes the steady state and dynamic base cases that the planning coordinator must use in its assessments to carry out Requirement R3. The goal of the test must be consistent with the general reliability principles embedded in the existing series of TPL, Transmission Operations (TOP), Reliability Coordination (IRO), and Protection and Control (PRC) Reliability Standards."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-We agree that such a mechanism is appropriate and direct the ERO to develop an appeals process (or point to a process in its existing procedures) and submit it to the Commission no later than one year after the date of this Final Rule

Para 97

"We agree that such a mechanism is appropriate and direct the ERO to develop an appeals process (or point to a process in its existing procedures) and submit it to the Commission no later than one year after the date of this Final Rule"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to develop a Reliability Standard that requires the use of protective relay systems that can differentiate between faults and stable power swings and, when necessary, phases out protective relay systems that cannot meet this requirement.

Para 150

"direct the ERO to develop a Reliability Standard that requires the use of protective relay systems that can differentiate between faults and stable power swings and, when necessary, phases out protective relay systems that cannot meet this requirement."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-We also direct the ERO to file a report no later than 120 days of this Final Rule addressing the issue of protective relay operation due to power swings. The report should include an action plan and timeline that explains how and when the ERO intends to

Para 150

"We also direct the ERO to file a report no later than 120 days of this Final Rule addressing the issue of protective relay operation due to power swings. The report should include an action plan and timeline that explains how and when the ERO intends to address this issue through its Reliability Standards development process"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-Also, pursuant to section 215(d)(5) of the FPA, the Commission adopts some of the proposed modifications in the NOPR and thus directs certain modifications to the Reliability Standard. Unless stated otherwise, the Commission directs the ERO to submit th

Para 16

"Also, pursuant to section 215(d)(5) of the FPA, the Commission adopts some of the proposed modifications in the NOPR and thus directs certain modifications to the Reliability Standard. Unless stated otherwise, the Commission directs the ERO to submit these modifications no later than one year from the date of this Final Rule."

Assigned: Project 2010-13 - Relay Loadability Order

DIRECTIVE: S-direct the ERO to modify PRC-023-1 to require that transmission owners, generator owners, and distribution providers give their transmission operators a list of transmission facilities that implement sub-requirement R1.2.

Para 186

"direct the ERO to modify PRC-023-1 to require that transmission owners, generator owners, and distribution providers give their transmission operators a list of transmission facilities that implement sub-requirement R1.2."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to re-file the violation risk factors associated with the Requirements of PRC-023-1 when it submits its comprehensive plan.

Para Footnote 197

"direct the ERO to re-file the violation risk factors associated with the Requirements of PRC-023-1 when it submits its comprehensive plan."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to document, subject to audit by the Commission, and to make available for review to users, owners and operators of the Bulk-Power System, by request, a list of those facilities that have protective relays set pursuant sub-requirement R1.

Para 224

"direct the ERO to document, subject to audit by the Commission, and to make available for review to users, owners and operators of the Bulk-Power System, by request, a list of those facilities that have protective relays set pursuant sub-requirement R1.12."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to modify the Reliability Standard to add the Regional Entity to the list of entities that receive the critical facilities list.

Para 237

"direct the ERO to modify the Reliability Standard to add the Regional Entity to the list of entities that receive the critical facilities list."

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to include section 2 of Attachment A in the modified Reliability Standard as an additional Requirement with the appropriate violation risk factor and violation severity level.

Para 244

"direct the ERO to include section 2 of Attachment A in the modified Reliability Standard as an additional Requirement with the appropriate violation risk factor and violation severity level."

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to revise section 1 of Attachment A to include supervising relay elements on the list of relays and protection systems that are specifically subject to the Reliability Standard.

Para 264

"direct the ERO to revise section 1 of Attachment A to include supervising relay elements on the list of relays and protection systems that are specifically subject to the Reliability Standard."

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to modify the Reliability Standard to include an implementation plan for sub-100 kV facilities.

Para 283

"direct the ERO to modify the Reliability Standard to include an implementation plan for sub-100 kV facilities."

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to remove the exceptions footnote from the Effective Dates section.

Para 284

"direct the ERO to remove the exceptions footnote from the Effective Dates section."

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2011

DIRECTIVE: S-direct the ERO to assign a high violation risk factor to Requirement R3 and to file the new violation risk factor no later than 30 days after the date of this Final Rule..

Para 297

"direct the ERO to assign a high violation risk factor to Requirement R3 and to file the new violation risk factor no later than 30 days after the date of this Final Rule…"

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to assign a single violation severity level of severe for violations of Requirement R1.

Para 308

"direct the ERO to assign a single violation severity level of severe for violations of Requirement R1."

Assigned: Project 2010-13 - Relay Loadability Order
Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to change the violation severity level assigned to Requirement R2 from lower to severe to be consistent with Guideline 2a.

Para 310

"direct the ERO to change the violation severity level assigned to Requirement R2 from lower to severe to be consistent with Guideline 2a."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to assign a severe violation severity level to Requirement R3.

Para 311

"direct the ERO to assign a severe violation severity level to Requirement R3."

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-direct the ERO to file the new violation severity levels described in our discussion no later than 30 days after the date of this Final Rule

Para 312

"direct the ERO to file the new violation severity levels described in our discussion no later than 30 days after the date of this Final Rule"

Assigned: Project 2010-13 - Relay Loadability Order

Status: Filed Delivery: 2010

DIRECTIVE: S-find that undesirable relay operation due to stable power swings is a specific matter that the ERO must address to carry out the goals of section 215, and we direct the ERO to develop a Reliability Standard addressing undesirable relay operation due to

Para 153

"find that undesirable relay operation due to stable power swings is a specific matter that the ERO must address to carry out the goals of section 215, and we direct the ERO to develop a Reliability Standard addressing undesirable relay operation due to stable power swings."

Assigned: Project 2010-13 - Relay Loadability Order

Project Report

Project 2010-17
Definition of Bulk Electric System

Directives -

Revision to ERO Definition of BES (Order 743)

DIRECTIVE: Directs (soft) NERC to consider comments on radial facilities
Due 1/25/2012

Para 55

"55. As we stated in the NOPR, we do not seek to modify the second part of the definition through this Final Rule, which states that [r]adial transmission facilities serving only load with one transmission source are generally not included in this definition. While commenters would like to expand the scope of the term radial to exclude certain transmission facilities such as tap lines and secondary feeds via a normally open line, we are not persuaded that such categorical exemption is warranted. For example, when the normally open line is closed, it becomes part of the transmission network and therefore should be subject to mandatory Reliability Standards. Commenters also argued that the bright line 100 kV threshold would encourage small utilities to choose not to provide backup service options, reducing overall customer service. We acknowledge these concerns, and direct the ERO to consider these comments regarding radial facilities in crafting an exemption methodology."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (hard) the ERO to modify the definition of BES
Due 1/25/2012

Para 30

"Therefore, pursuant to section 215(d)(5) of the FPA,38 the Commission directs the ERO to modify, through the Standards Development Process, the definition of bulk electric system to address the Commissions technical and policy concerns described more fully herein."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (soft) NERC to use the Standards Development Process to revise the
Due 1/25/2012

Para 16

"The Commission directs the ERO to revise the definition of bulk electric system through the NERC Standards Development Process to address the Commissions concerns discussed herein."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (hard) NERC to work with Regions to develop transition plans
Due 1/25/2012

Para 131

"We direct NERC to work with the Regional Entities affected by this Final Rule to submit for Commission approval transition plans that allow a reasonable period of time for the affected entities within each region to achieve compliance with respect to facilities that are subject to Commission-approved Reliability Standards for the first time based on a revised bulk electric system definition."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012

DIRECTIVE: Directs (hard) NERC to create an exemption process

Due 1/25/2012

Para 112

"Rather than devising a revised exemption process in the Final Rule, we direct the ERO to develop a proposed exemption process."

Assigned: Project 2010-17 - Definition of Bulk Electric System

Status: In Drafting Delivery: 2012