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Individual

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

No

Group

NPCC

Guy Zito

Northeast Power Coordinating Council

No

Although we agree with the concept and agree that it is unmeasurable, we do not believe that removal of the concept is acceptable and suggest regarding to "as soon as possible but not more than..."

Yes

No

We agree that not every SOL requires communications to another entity. However, there are subsets of SOLs that have the potential to become IROLs or, outside of that subset, left unmitigated, there are other SOLs which will become IROLs. We believe that there should be a requirement to inform the RC when these conditions occur.

No

Change the definition of Simulated Contingencies to: "The act of using planning and operating

models to replicate Contingency responses."

Yes

We agree that having evidence of proof for non-events has no value. The focus should be to have evidence of compliance for instances when an event in which compliance was required occurred.

No

TOP-001 - all VRFs but R4 should be HIGH (change R5 and R7). TOP-002 - raise R1 from Low to Medium. It is more than just an administrative requirement.

Yes

NPCC participant members agree provided that only the data specified is required to be dated, not the actual data.

Yes

Yes

No

The note next to R4 in TOP-006 reads: "Load patterns now covered in the new TOP-005. Remainder not required for reliability." We understand that TOP-005 is to be retired, and we are unable to find the new TOP-005 that covers this requirement.

No

No

Individual

Cleyton Tewksbury

Montenay Power Corp.

Yes

No

Yes

Yes

Yes

Yes

No

Group

Santee Cooper

Terry L. Blackwell

South Carolina Public Service Authority

Yes

Yes

No

Notification should be provided to the RC only when an IROL is exceeded. Too much information flowing to the RC could potentially mask a reliability problem.

No

Don't believe the current definition implies that a simulator is required. However, the definition of Simulated Contingency is not clear and very ambiguous. Suggested definition for Simulated Contingency is a contingency evaluated using planning and operating models of the BES.

Yes

Yes

No

OK with the measures and data retention with the exception of our concerns discussed in Question 12.

No

OK with the VSLs with the exception of our concerns discussed in Question 12.

Yes

Yes

No

Yes

TOP001-2 R2 the disconnections prior to switching portion of this requirement. Does this mean the RC and TOPs have to be called prior to switching in emergency situations? (e.g. a line is about to burn down) TOP004-3 R2 what is meant by Agreements in this context? An Agreement is a contract written or verbal. Do Interchange Agreements between TOPs fulfill this obligation? What is meant by synchronous BES tie line and should this be a defined term? Is this just to differentiate between AC and DC tie lines?

Individual
John McCawley
PECO Energy
Group
SERC OC Standards Review Group
Jim Griffith
Southern Co. Transmission

Yes

This phrase is not measureable!

Yes

Although we agree with the SDT's change regarding SOLs, TOPs should not allow an unintended consequence of this change to be less emphasis on resolving or mitigating SOLs.

Yes

We interpret this requirement to indicate that a TOP is required to inform the RC only if action is taken to mitigate an SOL, i.e., if the TOP decides that no action is required for an SOL, the TOP is not required to notify the RC.

No

For additional clarification, we suggest the following alternative wording for the Definition of Simulated Contingencies: "The act of using planning and operating models to model single branch or unit outages in the modeled network."

Yes

No

For TOP-001, R1, R2, R4 - the risk factor should not be the same for each time horizon shown. i.e., for operations planning, same day operations, real-time operations. We suggest R5 should have a Low VRF. For TOP-002-3, the time horizon for each of these requirements (R1-R3) should be "Operations Planning".

No

If the changes suggested above are agreed to by the SDT, please make the appropriate corresponding changes to the measurements.

No

TOP-001, R4. We suggesting changing the words "affect and affected" to "impact and impacted", respectively.

No

The SDT may want to consider a closer implementation date since there are no new requirements included in the proposed revisions to these standards.

Yes

Although we agree with the retirements of TOP-005, 006, 007 and 008, the following discrepancies are noted: Top-006-1, R5 indicates this requirement has been removed to new TOP-005. TOP-005 is being eliminated and a new TOP-005 is not being developed. Where does this requirement reside? or is it really needed? TOP-008-0, R1 indicates this requirement has been moved to TOP-003-1, which is the standard for Operational Reliability Data. Should this read that it has been moved to TOP-004? Per-001-0, R1. We agree with the elimination of this Standard The authority of the system operator is mandated in FERC Order 693, paragraph 112.

Yes

We suggest eliminating R2 of TOP-004-3. An interconnection agreement between two entities will include this requirement.

Individual

Craig McLean
Manitoba Hydro

Yes

Yes

No

As per TOP-004-3, exceeding an SOL does not necessarily put the BES at risk. The SOL for a thermal limit could very well be set for an ambient temperature much higher than the actual ambient temperature. Notifying the RC for such an event would be a waste of resources. We feel it is not necessary to make it mandatory to notify the RC when exceeding a SOL. TOPs should be mandated by a Requirement to document all SOL violations and action taken. Such action may include but is not limited to: simply further monitoring or making a temporary alarm level adjustment.

Yes

Yes

No

TOP-001-2. Data retention for all requirements should be the same. That is, current year plus the previous year.

No

TOP-001-2 R5.. SOLs should be removed from the requirement and the VSLs.

Yes

Yes

No

No

Group

PJM Interconnection

Patrick Brown

PJM Interconnection

Yes

PJM supports the deletion and recognizes the problem in measuring "intent".

Yes

The SDT has correctly balanced the need for flexible responses to non-impactive problems.

No

The issue here is in defining what is impactive and what is not. A flow value that creates a temporary overload on a radial line may not be of concern to an RC, thus informing the RC that the flows are under the limit is merely a distraction. During Emergency Conditions such nonrelevant information can be more than distracting it can needlessly tie up people to the point of causing those people to overlook real problems. The standard could be written to include a requirement that the RC must inform the TOP of any overloads that it, the RC, requires to be informed of. Then the TOP is obligated to provide information about the critical SOLs and mandated to report on the relief of every SOL.

No

The definition needs more work to avoid confusion. The word "simulated" will itself likely be a point of contention. One solution would be to delete the word "simulated". If this issue of postcontingency

simulation becomes a problem, then a Standard Interpretation can be issued.

Yes

No

TOP-001 - all VRFs but R4 should be HIGH (change R5 and R7) TOP-002 - raise R1 from Low to Medium some type of OPB assessment is required, it is more than just an administrative requirement.

No

TOP-003 M1-M5 - they all introduce a new requirement (i.e. the the report be dated) - that requirement should be dropped from the measures.

Yes

Yes

Yes

No

No

Individual

Scott Berry

Indiana Municipal Power Agency

Yes

TOP-003-1 Requirement 4. Entities are to provide data, as specified in R1, to their Transmission Operators. Does R1.2 (mutually agreeable format) cover the entities who are reporting data to their Transmission Operators? If the request for data is not done on a regular basis, the entities in R4 need to receive a proper request from the Transmission Operator and be given time to gather the data. Neither R1 or R4 clearly address this process and the standard should address how the entities in R4 will be made aware of any specification of data needed by the Transmission Operator or Balancing Authority.

Individual

Jianmei Chai

Consumers Energy Company

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

No

No

Individual

Kirit Shah

Ameren

Yes

Yes

This change is consistent with the fact that BES operation is a risk-based endeavor. While IROL risk is so severe it is unlikely to be properly evaluated by a TOP, SOLs should be considered as part of the normal risk assessment.

No

This has proven to be a duplicative effort since the RC is monitoring the facilities also. Change the text to say, "to the extent that the RC does not have systems in place, the TOP will â€¦".

No

This change is not necessary. The "Contingency" definition is for things that could but are not certain to happen. Obviously, there is no basis for a contingency that has occurred. Once occurred, it is an event.

Yes

An absence is sufficient.

Yes

No

There are inconsistencies in specified retention periods among several requirements. While we do not know the reason for this, we recommend that the SDT review the different retention periods and provide as much consistencies as possible.

No

1. For the TOP-001-2 VSLs for R4, what if the TOP or GOP does not coordinate because of system conditions. Is it possible that those entities might disagree as to what is a system condition? How would this disagreement be handled? 2. For the TOP-001-2 VSLs for R6, the timing is only one element of the evidence. These VSLs should be rewritten because the VSLs add to the requirement. The VSL should be changed to replace "the timing of when it acted" with "its actions" plus, add the text "when it" between the words "or" and "directed others".

Yes

Yes

No

Yes

Standard TOP-004-3, section "1.5 Additional Compliance Information" - should this be included in R1/M1? Why is there a separate section at the end?

Individual

Darryl Curtis

Oncor Electric Delivery

Yes

Yes

Yes

No

"Study Contingency" may be a better choice and would remove the possible link between simulator and simulated contingency

Yes

Yes

Yes

Yes

Yes

Yes

No

No

Group

Dominion - Electric Market Policy

Louis Slade

Dominion Resources Services, Inc

Yes

Yes

Yes

Suggest revising R5 to read "Each Transmission Operator shall inform its Reliability Coordinator of actions being taken to return the system to within limits when a reportable SOL (as identified by its Reliability Coordinator) has been exceeded. Suggest revising R6 to read "The Transmission Operator shall act or direct others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv and shall inform its Reliability Coordinator of such actions.

No

We suggest revising the stated purpose rather than creating a new definition. We suggest revising purpose to read " To ensure that reliability entities have coordinated plans for meeting expected operating conditions including contingencies that could occur based on projected system topology."

Yes

No

TOP-001-2 We believe that R5 and R7 warrant high VRF. TOP-002-3 R1 warrants something higher than low. How can the TOP meet the intent of R2 (VRF = high) if it has failed at R1? We suggest that R1 and R2 should be high. R3 should be reduced to low since the RC is required by IRO-004-1 @R3 to develop action plans in conjunction with its TOPs. The heavier burden should be placed on the RC. The time horizon for R1-3 should be changed to Operations Planning

No

TOP-001-2 @M4 - We don't agree with the underlying requirement (see comment to question 12). We do not agree with data retention requirements for M1 and M3 this standard. In our mind, there are two tenants that must be honored above all. The first is to follow reliability directives whenever possible, the 2nd is to provide data necessary for reliability assessments. Where an entity fails to comply, the requestor should immediately file a complaint with the region or NERC. We expect either of these to perform a prompt review. So, we don't see the need to keep data for a year nor do we see value in keeping data until next compliance audit when found non compliant. TOP-002-3 @ M3 should be removed as we do not agree with underlying requirement (see comment to question 12).

No

TOP-001-2 R1 - Could be interpreted that non-compliance is based on number of occasions whereby entity invoked safety, equipment, regulatory, or statutory requirements as opposed to number of occasions whereby entity failed to comply with reliability directives. Suggest revising to read "did not comply with reliability directives issued by the Transmission Operator and did not inform the Transmission Operator that such actions would violate safety, equipment, regulatory, or statutory requirements, on one occasion." Suggest use of similar language for each Severity Level. R3 - Suggest revising to read "The Transmission Operator, Balancing Authority, or Generator Operator did not render emergency assistance to others, as requested and did not inform the requestor that such actions would violate safety, equipment, regulatory, or statutory requirements. R4 - Revise to conform to comment in question 12. TOP-003-1 R4 - Do not agree that a any failure to provide data warrants severe. Is reliable operations jeopardized for failure to report an outage on a 10 Mw peaking CT as it is for a 1000 Mw base load unit? We don't see them as the same and would rather see something akin to the following: Low - Failed to provide > 25% of data required Moderate - failed to provide 26-50% of data required High - Failed to provide 51-75% of data required Severe - failed to provide > 75% of data required

Yes

While we agree with the SDT that all prerequisites must occur prior to implementation of this plan, we wish to cite, for the record, the sheer volume of draft standards that are now

'dependant' for prerequisite action on preceding drafts. We would like to see a moratorium on new drafts until the current back log is cleared. We are concerned that new drafts are being reviewed with the potential that ramifications of underlying/preceding drafts aren't being fully understood and/or that modifications made to any such drafts may not follow through in later draft standards predicated upon them.

No

We believe that the existing standards are more clear those contained in this draft. This draft seems to be trying to delineate TOP and BA standards/requirements from RC standards/requirements. In doing so, the draft loses the feeling of cohesiveness of the existing standards.

Yes

Typically, GO, GOP, PSE, LSE entities are prohibited from by federal and/or state Standards/Codes of Conduct from access to much of the information that would be required to perform any type of 'reliability assessment', determination of criticality or adverse impact. Only entities such as the RC, TO, TOP and perhaps BA have access to all the necessary information to make such determinations. For the GO, GOP, PSE, LSE entities, any such determination is really a business risk assessment, not a reliability assessment.

Yes

Generic comment - There appears to be a hierarchy created by Reliability Standards with the RC being highest, followed by (equally?) the BA and TOP. If this is true, we'd prefer that the RC identify requirements necessary to enable it to meet its requirements under the standards. As new standards are being created, there appears to be the potential for some entities to have to provide the same information or have to coordinate actions with multiple entities but at different times, using different protocols. As examples: IRO-002-2 already requires the RC "to determine the data requirements to support its reliability coordination tasks and shall request such data from its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities, or adjacent Reliability Coordinators." EOP-002-2 states "A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load." In order to meet this requirement, the BA will likely have to request GO/GOP to provided unit availability data (outages, derates) and the DP, TOP and/or LSE to provide load projections. This same information will likely be needed (and required) by the RC to perform its assessments. In this project TOP-001-008@ R4 states "Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to affect other reliability entities." and TOP-003-1@ R4 requires entities to provide data, as specified in Requirement R1, to its Transmission Operator(s). If these entities have provided the information required by their respective RC and the RC is required to coordinate with other RCs (IRO-014-1) there appears to be duplication which increases the workload of each entity and introduces opportunity for miscommunication or what may appear to conflicting submission of data (assuming that format and timeline differ). Specific comments TOP-001-2 R3 - concern about ambiguity of phrase "to others", particularly from the GOP perspective. For reliability standards, the GOP should only be required to provide such assistance when so requested by its RC. Any other obligations should be included in the terms and conditions of its Interconnection Agreement with the TO or DP and, as such, is outside the scope of these standards. R4 - Concern about phrase "coordinate its respective operations known or expected to affect other reliability entities with those entities", particularly as it applies to GOP. GOP doesn't have access to data, nor the expertise, to make reliability assessments and may be precluded by Codes/Standards from coordinating with other entities. Suggest revising to require GOP to provide data as required by its RC to perform reliability assessments. Since GOP has to follow emergency directives issued by RC or TOP, there is nothing for the GOP to coordinate. If GOP actions or planned actions are deemed to have the potential to result in adverse impact to reliability, the RC or TOP should issue a directive to GOP to cancel such actions. TOP-002-3 - R3 should be deleted given that IRO-004@R3 states that "Each RC shall, in conjunction with its Transmission Operators and Balancing Authorities, develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs." TOP-003 R1.2 - Am concerned about the term "mutually agreeable format". Does the phrase 'mutually agreeable' apply to ALL applicable entities, or just the TOP and BA? Aren't there

enough protocols and tools currently in existence (SDX, ICCP, RCIS) that the standard could at least address use of existing formats as opposed to 'mutually agreeable'? R4 - Does not require entities to provide data to BA although R1 requires BA to "have a documented specification for data..." and R3 requires each BA to "distribute its data specification to entities". We suggest revising R4 to read "Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, and Transmission Owner shall provide data, as specified in Requirement R1, to its Transmission Operator and Balancing Authority." We removed the plural indicator as we believe that each entity's facility can be in only one TOP and BA area. If information relative to that facility is needed by multiple TOPs or BAs, those entities should share information. The entity should not be required to submit data for the same facility to multiple reliability entities.

Individual

Will Franklin

Entergy System Planning & Operations (Gen & Mktg)

Yes

No

The RC should be aware of SOL exceedances in order to perform their function and maintain situational awareness.

Yes

The definition of "Simulated Contingency" provides enough clarity to avoid confusion.

Yes

Yes

Yes

The Implementation Plan refers to items in other proposed standards that will take the place of existing requirements, some of which are referred to by project number and others by standard number. In either case, the proposed standard that will contain the requirement should be presented or easily referenced. For example the proposed IRO standards that will accommodate requirements moved from the TOP standards are not available for review and confirmation. Also, several requirements were deleted because they were "immeasurable". Some of these items should be revisited and determined if an alternative "measurable" requirement can be drafted. For example, it is important that an entity not continue to operate in an unknown operating state (TOP-004 R3) and promptly return to an analyzed condition/or perform an analysis for the current condition.

Individual

Edward J Davis

Entergy Services

No

There is merit in holding entities accountable for making timely notifications, etc. Would an entity be compliant if they waited 6 months to notify the TOP of a change in Real Power capability?

Perhaps the measures can be worded such that proof of the event's time and proof of the notification's time are not significantly different. However, we suspect that entities for which the requirement is applicable would WANT guidance on what is timely and what is not. Leaving that much up to the interpretation of audit teams is not very desirable.

Yes

We agree as this was the original intention of the NERC OLDTF that first developed the terms SOL and IROL.

No

SOLs should be removed. While certain SOLs may need to be communicated to the RC per internal processes, only IROLs should be required to be reported. Reporting of every SOL could "water down" the communications to the RC and add confusion when IROLs are reported.

No

There can be much confusion with the standards when terms are used in multiple ways. The poster child for this is "critical facilities." I agree with the intent of the SDT, but suggest the term "Postulated Contingencies."

Yes

No

TOP-002-3 R1: VRF should be Medium since you can't do R2 or R3 without it. TOP-003-1 R5 - VRF should be Medium, the same as R4

No

TOP-002-3 M1: We suggest a good example of compliance evidence be power flow models and study results instead of operator logs. If not, what does "assessment" mean in R1?

Yes

Yes

No

Yes

Please expound upon the reasons why the SDT determined that TOP-002-2 R19 and TOP-004-2 R4 are unmeasurable. TOP-001-2 R4 is going to be very difficult to measure. Any guidance the SDT can provide on how to demonstrate compliance would be appreciated. TOP-002-3 R3: The requirement that was mapped to this in the implementation plan used the phrase "shall coordinate." We think that R3, as written, is too vague. Also, it is more command and control versus a collaborative effort as implied by the previous use of "coordinate."

Group

Southern Company Transmission

Roman Carter

Southern Transmission

Yes

Yes

No

Requirement 2 of TOP-001-2 already contains a provision for the TOP to inform its RC of realtime or anticipated emergency conditions. If a particular SOL is considered an emergency condition, then it would be reported. Otherwise, it is not required. Therefore, we agree that notifying the RC of every SOL is not necessary.

No

The proposed definition of "Simulated Contingency" is not clear. Also, it is not apparent why a new definition is even needed. Make the definition part of the requirement. Why couldn't "Simulated" be replaced with something like "depicted", "represented" or "portrayed". Possible wording for the Requirement 1 might be "The Transmission Operator shall have an assessment for the next day's operation that indicates whether it will exceed any of its System Operating Limits (SOLs) during anticipated normal conditions and Contingency events represented through planning and operational analysis models reflecting design parameters and system conditions." In the event the drafting team does not agree to implement our suggested change above, the drafting needs to address this issue also in IRO-004-01, R1 where the requirement states normal or anticipated contingency events and not "simulated events". The two requirements should be consistent in terms.

Yes

Yes

Yes

Yes

No

Both TOP-001-1, R1, and PER-001-0, R1, were deleted. These standard requirements require operating personnel under the TOP and BA to have the responsibility and authority to implement real time actions to ensure the stable and reliable operation of the bulk electric system. Additionally, in paragraph 1330 of FERC Order 693, FERC approved PER-001-0 as mandatory and enforceable. Accordingly, FERC is clear in its intention that the operating personnel of the TOP and BA have authority to take action without any managerial approval being required. Also, in paragraph 1582 of the Order 693, FERC states R3 of Reliability Standard IRO-001-0 establishes the decision-making authority of the reliability coordinator, but not operating personnel of the TOP or BA. These facts stated above could be exposing a reliability gap if this standard is approved as written because the entities performing the TOP and BA functions must have the support of a NERC standard to be able to take immediate action without management approval or intervention. Reliability Standards Compliance programs are based on abiding by the NERC standards. By the TOP and BA not having clear decision-making authority from a NERC standard could lead to senior management of a company stepping in and requiring their approval before operating personnel are allowed to take action to alleviate problem. This could lead to jeopardizing reliability. IRO-001-1, R2 has been deleted. It would seem logical that a requirement for the TOP to take immediate action to alleviate operating emergencies including curtailing transmission service or energy schedules, operating equipment (e.g., generators, phase shifters, breakers), shedding firm load, etc., would be worthy of being kept in the

standard. If it is a duplication of an existing requirement, then please reference where the duplicate requirement is located. ¶ Under TOP-001-2, R2 the phrase "including potential impacts caused by disconnections prior to switching" was added to the requirement. This addition seems to provide too much specificity and provides a very granular view for the requirement. It is best to remove this phrase and bring the requirement back to a higher level and end the sentence after "emergency conditions". ¶ It was noted that TOP-001-2, R3 replaces TOP-001-1, R6 and that the following component of the old R3 was deleted: "provided that the requesting entity has implemented its comparable emergency procedures". For an entity to render emergency assistance to another entity who has not implemented their own internal company emergency procedures prior to seeking help from others is not a wise decision. Deleting this phrase would create a burden on others providing the emergency assistance. Unless it can be shown there are other standard requirements already containing this required action, we recommend NOT removing this phrase. ¶ Removal of the BA from requirement (TOP-002-2, R1) to plan operations into the future is not appropriate. Although it is agreed that CPS and DCS are much of the real-time basis for reliable operation, due to the physical requirements to start or even change output of many units, it is absolutely necessary that the BA plan a near-term operating horizon of several hours so that DCS and Energy Emergencies can be avoided. Removing the requirement for the BA to plan because DCS covers everything would be like removing the requirement for TOP to plan and just rely on the fact that the TOP has to correct SOLA™s and IROLA™s under TOP-004-1, R1 without any planning. Also, without this requirement to plan, under what basis would the BA have to request the generator output planning information currently in TOP-002-2, R15 that the SDT says will become part of TOP-003-1 data specifications? The Generator Operator could say there is no need for the BA to plan beyond what is needed for DCS and CPS and thus claim such requests are not needed. By removing this requirement the SDT has removed any basis for doing near-term planning. ¶ Similarly to the comment above for R1, the BA has a need to plan for the items covered in TOP-002-2, R5. Such a requirement should be included in the new R1 of TOP-002-3. ¶ TOP-002-2, R8 requires the need to plan to meet Interchange Schedules and ramps, and should be carried forward to TOP-002-3. Even though INT-006 requires the BA to consider ramping capability in approving/denying Arranged Interchange, generation dispatch and unit capability can change significantly after an Arranged Interchange is approved. The BA must consider (i.e. plan) near term ramps in being able to meet an upcoming Interchange ramp. The result of not planning for a ramp that can no longer be met is a frequency deviation. The ability to ramp is not a parameter in the BAL-001 and BAL-002 standards. ACE is the basis for BAL-001 and BAL-002 and ramping capability is only one contribution to ACE and thus those standards should not be used as a reason for removing this requirement. In addition, the CPS criteria of BAL-001 are not granular enough (CPS1 is 12 month rolling average and CPS2 is a calendar month number) to manage real-time issues that can cause reliability problems. ¶ In the new TOP-003-1 which addresses reliability data needs, R2 and R3 require distribution to entities "that provide Facility status". Why is the term "oestatus" used? Why would not the distribution be to any entity that is the source of data under the specification R1 and not limit it to a "Facility status" source? ¶ In the mapping table of the Implementation Plan, TOP-006-1 R5, R6 and R7 were deleted with a reason given by the SDT that the monitoring activities are covered in the certification process. It is unclear how a one time verification of the activity during certification translates into a requirement that the monitoring processes continue " and more importantly that violations have a penalty. It is recommended that these requirements be retained (and perhaps others deleted added back as well). ¶ Under TOP-004-3, R2 states that Agreements between TOPs are required for switching of BES tie lines. It is felt that this type of detailed information would be contained in the Interconnection Agreements between the two parties. Only when there are not existing Agreements in place would this requirement be necessary. In those cases where it is necessary, it is recommended that "specify switching" be replaced with "specify the procedures for switching". ¶ Under TOP-003-1, R4, the Balancing Authority should be added along with the Transmission Operator as receiving data as specified in R1. Requirement 1 requires the TOP and BA to have documented specification for data, and R4 requires the responsible entities to provide this data only to the TOP. If the BA is required to have the documented specification for data support, then the responsible entities should be required to provide appropriate data not only to the TOP but to the BA as well.

Yes

In the purpose statement the term "functional entities" is used. The term creates a confusion of

terms between the purpose statement and requirements. Requirements 4 and 7 call for coordination among "other reliability entities" and "reliability entities" respectively. Therefore, recommend replacing "functional" with "reliability". The limits mentioned in TOP-001-2, R5 need more description. The recommended change is as follows: "Each Transmission Operator shall inform its Reliability Coordinator of actions being taken to return the system to within the IROL limits when an IROL or SOL has been exceeded." Requirement 7 of TOP-001-2 is duplicative as it applies to the TOP to that of standard IRO-005-2, R13. Could this result in a double jeopardy for non compliance with this requirement? In TOP-003-1, in the Purpose statement replace "system" with "System". In R1 of TOP-003-1, it is recommended that the term "specification" throughout the standard be replaced with a better term to describe what is meant in the standard. For example, the word "catalog" may be a better term. Also, it recommended that in the sub-bullet R1.3 the word "providing" should be replaced with "exchanging". In TOP-001-2, in section 1.4 of Data Retention the term "reliability entities" is capitalized. Should it be in lower case? On several requirements (e.g., TOP-006-1, R1; TOP-008-1, R1) recommended for retirement, there is a comment in the redline version stating that the requirement is covered in another standard. Upon reviewing the other standard, the requirement was not found. Was the latest version of the standard posted properly on the NERC website?

Individual

Dan Rochester

Independent Electricity System Operator

No

This phrase should not be removed. If measurability is required, similar language ("without delay") in R4 of the recently approved IRO-009 standard should be used, with a condition to assess if there was a 5 minute delay for assigning a High VSL.

No

We strongly disagree with removing the requirement for the TOP to operate within SOLs. We are unable to understand the argument that this requirement will "reduce the operational flexibility by eliminating th TOP's ability to determine that a mitigation, such as load shedding, was more severe than the risk of the SOL violation itself, such as exceeding a thermal limit for a short time." SOLs are determined to set upper bounds beyond which transmission facilities may be overloaded or system voltage may be depressed or the operators will be operating in an unknown state. If such upper bounds are to be ignored to enhance operating flexibility, then why should SOLs be determined in the first place and how do we ensure operating reliability? Further, FAC-014 requires TOPs to develop SOLs, why would we be requiring the TOPs to do so while we suggest that they do not need to operate within the bounds that they themselves develop in the first place? Do the two sets of standards contradict each other? We are also very concerned that R1/R2 in TOP-002 requires the TOP to assess potential exceedence of IROLs only but not SOLs. This sends a the wrong message to the industry that TOPs do not need to plan their operations to within established SOLs. So why do we mandate the TOPs to calculate SOLs to begin with? We feel strongly that R2 in TOP-002 should be revised so that it includes as part of the requirement, preclusion of operating in excess of any SOLs. We believe that completely removing SOLs from the requirement is contrary to the long-term objective of enhancing reliability. Further, we believe that all SOLs should be respected in the planning time-frame and in real time with the exception of low likelihood or rare circumstances. We do recognize that there are instances where post-contingency, a TOP may not be able to respect its reparation limits for the next contingency. Those instances must however be limited to situations in which, after applying available means to eliminate the violation short of firm load shedding, and where it can be demonstrated that the SOL violation cannot propagate into an IROL violation following the next worst contingency. That is, the reparation limit is non-impactive to the BES. We need only recall that some blackout events started by exceedence of local area limits (SOLs). When sufficient events occur (such as when a line rating is not observed or its overload not corrected), cascade overloading on another transmission line and yet another transmission line and so on may occur. An apparently non-impactive SOL, if not observed and whose exceedence not corrected, can result in cascading outages.

Yes

SOLs are intended to ensure reliabile operation of the BES. TOPs, who calculate these SOLs to begin with, shall not intentionally operate its system to be very near or exceeding SOLs. Thus, we do not expect SOL exceedences to occur so frequently that reporting to the RC will create an overload of messages.

No

We do not see the need to define this new term. Further, the definition is inaccurate (mixing contingency which is a "what-if" event with system response) and confusing (we are unable to understand the meaning of "the net effect of design considerations" in an operational planning assessment domain. Having said that, we do not interpret the term to mean the requirement for a "simulator". To eliminate the concern of misinterpretation, we suggest that R1 be reworded to "during anticipated normal conditions and analyzed contingency events."

No

First of all, we do not agree with the removal of SOL from R1 so we do not agree with M1. On the approach the SDT is proposing, we do not agree with the rationale that the absence of an IROL violation report is a sufficient measure. We believe the TOP should be required to provide evidence to demonstrate compliance (in this case, the data showing operating within IROL and Tv).

No

TOP-001 R1: We do not agree with a High VRF. Not complying with the TOP's directives does not necessarily result in cascading outages or instability. And since the responsible entities are allowed to not comply with the directives for safety and other reasons, we are unable to ratiolanlize how impactive a risk can be when an entity violates this requirement. R2: We are unable to assess the VRF for this requirement since we do not understand the meaning of "a potential impacts caused by disconnections prior to switching." R3: We do not agree with a Hgh VRF for the same reason as for R1, viz. if provisions for not complying is given, how high a risk it is if a responsible entity violates this requirement? TOP-002 R1: We suggest raising the VRF for R1 to a Medium. Day ahead operationL assessment of system conditions against established limits is essential in ensuring sufficient resources are available and operational plans are in place to prevent exceeding limits and to provide mitigating measures when such exceedence occurs. This assessment uses established limitis and as such, is equally impactive, if not more impactive, than developing the limits themselves. TOP-003 R5: We do not agree with a Low VRF assigned to this requirement whose intent is essentially the same as R4 except R5 goes beyond the local TOPs and BAs to the adjacent or higher level entities, which also need this data to ensure reliable operation. We suggest this VRF should be Medium - the same for R4.

No

We do not agree with some of the requirements (see above) and hence do not agree with some of the Measures. Other than that, we generally agree with the measures and retention periods for those requirements that we agree with.

No

a. We do not agree with some of the requirements, and suspect other commenters may express disagreements with some requirements. This may result in changes to the requirements and as such, the VSLs will need to be revised. b. A number of the VSLs proposed in the TOP standards, e.g. TOP-001, R1 and R2, are graded according to the number of repeated violations. This approach may need to be changed since recent FERC NOPR proposes that repeated violation is not to be the basis for different violation levels. c. TOP-003, R1: It appears that missing one of the subrequirements is assigned a Low VSL, missing 2 of them is assigned a Medium VSL and missing all 3 or having no documented specification is assigned a Severe. We suggest to move the first 2 conditions to Medium and High.

Yes

We generally agree with the implementation timeframes that are dependent on the implementation of other standards. However, we reserve judgment on any specific issues that may arise when more definitive dates are proposed.

No

The note next to R4 in the red-line version of TOP-006 says: "Load patterns now covered in the new TOP-005. Remainder not required for reliability." Since TOP-005 is to be retired, we are unable to find a new TOP-005 that covers this requirement. Please explain the relevance of this note.

No

No

Individual

Greg Rowland

Duke Energy

Yes

Yes

We agree with the SDT's logic in eliminating SOLs from TOP-004-2 Requirement R1.

Yes

R5 should be revised to also require the TOP to notify the RC of the particular IROL or SOL that has been exceeded.

No

We believe that the definition of Simulated Contingencies should be revised as follows: The act of using planning and operating models to model single branch or unit outages in the modeled network.

Yes

Yes

Yes

No

TOP-003-1 Requirement R5 VSLs should be patterned after the VSLs for Requirements R2 and R3, i.e. a graduated scale since R5 is not a binary requirement. TOP-002-3 Requirement R3 - if only one reliability entity is identified in plans to preclude exceeding an IROL, and that entity is not notified, which VSL would apply - "Lower" or "Severe"?

Yes

Yes

TOP-005-1 Requirement R2 has been deleted because it is not a reliability concern. Has this requirement been picked up in NERC Rules of Procedure or business practices? TOP-006-1 Requirement R4 is being deleted, and the comment says that load patterns are covered under TOP-005. But TOP-005 is also being deleted - is it intended that load data will be covered by TOP-003 now?

No

Yes

TOP-001-2 Requirement R4, Measure M4 and VSLs for R4 : What does the word "affect" mean? Any operation by a TO or GO could have a slight affect on other reliability entities. The word "affect" should be qualified in some manner, to avoid a requirement to coordinate operations with negligible impact. We suggest using the phrase "have a reliability impact upon" instead of the word "affect". TOP-004-3 Requirement R2, Measure M2 : What does "specify switching" mean? We suggest this wording be removed from the requirement. This requirement may have been moved from TOP-004-1 Requirement R6, but it is unclear. TOP-008-0 Requirement R1 is being deleted. The Comment says that this is now covered by TOP-003-1, and in consideration of TOP-001 and TOP-004 requirements in combination. We think the Comment should not reference TOP-003-1. TOP-002-2 Requirement R11 contains a requirement for a seasonal assessments to determine SOLs. Where is this requirement in the revised standards?

Group

Bonneville Power Administration

Denise Koehn

Transmission Reliability Program

Yes

Yes

No

Agree that it would increase workload while trying to return the system within limits. This requirement should probably move to TOP-004-3. R6 should maybe move there also as Real-Time Operations?

No

Change the definition from "design considerations" to "planned outages".

Yes

SDT has cleaned up TOP-004-3 well, removing duplicate requirements from other standards. I don't believe R2 (Agreements of switching) is necessary since TOP-001-2 R3 appears to cover assisting to mitigate emergencies/IROLs. It seems to me TOP-001 R5 and R6 are also real time operations and should go to TOP-004-3 has R2 and R3.

Yes

Yes

Yes

I think TOP-001-2 R6 would be better to say the TOP "shall act to ensure mitigation of the magnitude of the event" thus eliminating extraneous phrasing "direct others".

Yes

Yes

Yes

WECC TOP-STD-007-0 would now need to link to TOP-004-3 (R1).

Yes

Good Ideas - thanks. However, do not see anything analogous to the current TOP-001 R1. and think we should retain something of this nature.

Group

Midwest ISO Stakeholders Standards Collaborators

Jason Marshall

Midwest ISO

Yes

Intent is an enforcement issue. Thus, it does not belong in the standard.

No

The TOP should be required to operate within SOLs. SOLs by definition can be voltage or stability limited. SOLs, if exceeded, can become IROLs. What in the standards will ensure that the TOP is sure the exceeding the SOL will not result in an IROL. The situation described in the question may not even require that an SOL be defined. No where in the standards is there a requirement that every thermal limit must be encompassed in a SOL. If a TOP decides to "ride" out an SOL rather than mitigate the violation, in reality the TOP has indicated that the current SOL is invalid. Why can't the TOP just determine what the new SOL is?

Yes

We believe that the TOP notifying the RC of every SOL that has been violated does not create an overload messages. The TOPs in the Midwest ISO reliability footprint already notify the RC of all SOL violations and we have not found it to be a burden. In fact, we have found it actually improves operations because it causes the RC to continuously validate the results of the realtime contingency analysis against the TOPs. We do believe that the requirement should not be prescriptive to require a particular type of communication such as via the phone. To a certain degree this requirement can be met by simply having redundant models and contingency analysis in the EMS. We observe that the requirement is not for the TOP to notify the RC every time that an SOL is violated. In fact, the requirement is only to notify the RC of the actions to be taken. Thus, if no actions are taken, the TOP does not have to notify the RC. We believe the language should be strengthened to clarify that the TOP should notify the RC everytime an SOL is violated even when no mitigation is taken.

No

Why can't you just use the term potential in front of Contingency?

Yes

Individual

Thad Ness

AEP

Yes

Yes

The purpose statement in TOP-004-1 is consistent with the IROL NERC defined term. We suggest keeping the original purpose statement from TOP-004-1. If SOL are to be reported then some prioritization needs to be given. We suggest reporting the largest SOL if there are several common to an area of congestion.

Yes

The TOP-001-1 purpose statement deals with emergencies and taking actions to resolve them.

The TOP-001-2 purpose statement deals with coordination. We concur that notifying the RC of every SOL violation could be overwhelming and counter productive to reliability. If SOL are to be reported then some prioritization needs to be given. We suggest reporting the largest SOL if there are several common to an area of congestion.

No

The "Simulated Contingency" definition lacks clarity and its use in TOP-002-3 R1 does imply that an offline load flow program would be required when conducting a next day assessment.

Suggested wording: Replace "and Simulated Contingency" with "and/or potential contingency".

No

Refer to question 3 response. The TOP-001-2 three year data retention for SOL violations seems excessive. Data that has been retained this long tends to lose its value. We would like to hear an

argument from the SDT how this improves system reliability. Similarly, the three year data retention for distributing data specifications in TOP-003-1 (R2/M2, R3,M3) also seems excessive. We propose that the current and previous calendar years would suffice.

Yes

Yes

Yes

The intent of TOP-004-03 R2 requires some clarification. It seems unnecessary to have an agreement for switching every BES tieline. It seems unlikely that every conceivable situation for switching a tieline could be covered in any type of agreement.

Group

FirstEnergy

Dave Folk

FirstEnergy

Yes

Yes

No

However, the SDT should develop rules that will drive the reporting of incidences where entities exceed SOLs on a regular basis. As an example: the operating studies show that the facility emergency thermal limit is expected to be exceeded by 25% for 4 consecutive hours of 5 consecutive operating days. The goal should be to flag instances where SOLs are exceeded on a regular or routine basis in an effort to highlight situations where mitigation actions or system reinforcement projects may be needed or required to preserve the reliability of the BES.

No

We believe that the definition is not needed and that the use of the word "simulated" in and of itself provides sufficient clarity that the requirement does not refer to actual Contingency events. The premise of the requirement is an assessment of "next day" system condition so it is unclear how this could in anyway be construed to be an actual contingency event. However, what is not clear in the requirements is what type of contingencies are to be evaluated? Is it single Contingency (N-1) events only. What if bus faults were not studied would there be a potential for non-compliance? There should be some tie to the TPL standards to specifically identify which Contingencies must be evaluated for Next Day analysis.

Yes

No

The VRF for TOP-001-2 R7 should be a "High." Failure to follow the most conservative limit in times of uncertainty could negatively impact real-time reliability. The VRF for TOP-002-1 R4 seems inconsistent. It has a qualifying concept of urgency of time in the phrase "unless System conditions do not permit such coordination." which implies critical to the reliability of the BES yet it has been assigned a Medium VRF. Also, failure to coordinate an action may not always result in an impact on the BES, but the action does in theory bear a risk to the reliability of the BES. This VRF should be a High. The VRFs for TOP-002-3 seem inconsistent. Requirement 2 which requires planning to mitigate a potential IROL discovered in the study required under R1 has a High VRF while R1 which requires the study be done has a Low. It is difficult to understand how a source requirement such as R1 can have a lower VRF than a derivative requirement such as R2. R1 and R2 should both have Medium VRFs since they are planning in nature and do not have an immediate impact on the BES. The VRF for TOP-003-1 R4 and R5 seem inconsistent. The drafting team appears to consider it a Medium risk for an entity not to supply operating data to its Transmission Operator, but a Low risk for that Transmission Operator not to supply the operating data to an entity "with immediate responsibility for operational reliability." The VRF for R5 should also be a Medium.

Yes

No

The VSL for TOP-001 R1 should all be revised to state, "The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with reliability directives issued by the Transmission Operator, and the respective entity failed to inform the Transmission Operator that such actions would violate safety, equipment, regulatory, or statutory requirements on (one, two, three, four or more) occasion." The VSL for TOP-001 R3 should be revised to state, "The Transmission Operator, Balancing Authority or Generator Operator did not render emergency assistance to others, as requested and available, and such actions would not violate safety, equipment, regulatory, or statutory requirements. The VSL for TOP-001 R4 should

be revised in a similar fashion to R1 and R3 above. The VSL for TOP-002 R3 as written implies that an entity that interacts with only one reliability entity would not receive a violation greater than "lower." In addition, as written these VSLs seem to allow the Compliance Auditor the opportunity to choose how to apply the VSL. As an example the entity with one reliability entity could be found to be guilty of a "Lower" violation because they missed their one reliability entity or they could be guilty of a "Severe" violation because they missed 100% of their reliability entities. Suggest the drafting team eliminate the first sentence of each of these VSLs and use percentages as the test of violation severity. The VSL for TOP-003 R2 as written implies that an entity that interacts with only one data supplier would not receive a violation greater than "lower." In addition, as written these VSLs seem to allow the Compliance Auditor the opportunity to choose how to apply the VSL. As an example the entity with one data supplier could be found to be guilty of a "Lower" violation because they missed their one data supplier entity or they could be guilty of a "Severe" violation because they missed 100% of their data supplier entities. Suggest the drafting team eliminate the first sentence of each of these VSLs and use percentages as the test of violation severity. The VSL for TOP-003 R3 has the same problem as R2. Suggest the drafting team eliminate the first sentence of each of these VSLs and use percentages as the test of violation severity. The VSL for TOP-004 R1 states, "The Transmission Operator did not operate within an identified Interconnection Reliability Operating Limits (IROL) and the associated IROL Tv for any single occasion." This should be changed to state, "The Transmission Operator failed to mitigate an identified Interconnection Reliability Operating Limits (IROL) and within the allotted IROL Tv for any single occasion." The VSL for TOP-004 R2 as written implies that an entity with only 1 tie line would not receive a violation greater than "lower." In addition, as written these VSLs seem to allow the Compliance Auditor the opportunity to choose how to apply the VSL. As an example the entity with one tie line could be found to be guilty of a "Lower" violation because they missed their one directly connected entity or they could be guilty of a "Severe" violation because they missed 100% of their directly connected entities. Suggest the drafting team eliminate the first sentence of each of these VSLs and use percentages as the test of violation severity.

Yes

Yes

While we support the reduction in the overall number of standards, the deleted standards contained some requirements whose deletion we can not support. We have communicated these requirements and the issues surrounding them in the responses to other questions on this form including question 12 at the end of this form.

Not aware of any.

Yes

In TOP-001-2 R2, the term "disconnections" is ambiguous. In addition, as written this requires the RC be notified prior to operator action. While we agree that we do not want operators taking actions that sacrifice accuracy for speed, we do not support the concept of approving all mitigation actions prior to implementation. Nor do we believe this concept serves to preserve or enhance reliability in situations where time is of the essence. The motivations behind the original requirements were 1) to preserve the reliability of the interconnection through recognition and mitigation actions and 2) to ensure that removal of overloaded transmission facilities was done only when it preserved or enhanced reliability. We feel these two concepts should be managed as individual requirements similar to the requirements in effect today. The Drafting Team should include the system conditions of overload, abnormal voltage, and reactive conditions, and endangered equipment as system conditions permissible for action then communication. In TOP-001-2 R3, the Drafting Team dropped the concept of the requesting entity implementing its comparable emergency procedures prior to an entity being required to lend assistance. This could lead to a request and requirement for TOp A to shed load in its area when TOp B, the entity requesting the assistance, has not shed load that would mitigate the emergency in its own area. This requirement should be revised to state, "Each Transmission Operator, Balancing Authority, and Generator Operator shall render emergency assistance to others, as requested and available, unless such actions would violate safety, equipment, regulatory or statutory requirements and provided the requesting entity has implemented its comparable emergency procedures." In TOP-001-2 R4, the Drafting Team preserved limiting the delay in notifications to system conditions. This change as written does not provide additional clarity as to which system conditions require and do not require notification in advance of action. This seems to make this Requirement too vague to be measurable. As currently proposed, this requirement means someone must decide

which system conditions require and do not require advance coordination. Additional rules need to be developed by the team concerning the system conditions that require notification in advance of action. While we agree that we do not want operators taking actions that sacrifice accuracy for speed, we do not support the concept of approving all mitigation actions prior to implementation. Nor do we believe such a concept serves to preserve or enhance reliability in situations where time is of the essence. We recommend the drafting team restore TOP-001-1 R7.3 that states, "When time does not permit such notifications and coordination, or when immediate action is required to prevent a hazard to the public, lengthy customer service interruption, or damage to facilities, GOp notifies TOP, TOP notifies RC and adjacent TOPs at earliest possible time." As currently written this proposed requirement leaves it open for the operator to complete the mitigation actions prior to notifications taking place when system conditions do not permit such coordination which is inconsistent with the Drafting Team's action on other requirements, but is appropriate considering the potential system conditions. In TOP-001-2 R5, the Drafting Team is supporting action in advance of communication, we support this stance. The Drafting Team proposes to delete TOP-007-0 R3 that states, "A Transmission Operator shall take all appropriate actions up to and including shedding firm load, or directing the shedding of firm load, in order to comply with Requirement R2" because the authority already exists and does not need to be cited in a requirement. Other than the Reliability Standards, where does this authority exist? It seems that the drafting team intends to remove all requirements that provide for this authority in the Reliability Standards. We cannot support this stance. Without this provision in the standards, there is nothing to preclude an organization from requiring its operators to obtain approval from superiors within the organization prior to taking an action such as load shed, redispatch, reconfiguration, etc. that they know will preserve or enhance the reliability of the BES. While we agree these requirements do not provide any legal protection to the operator, they do enhance reliability of the BES by ensuring authority to act remains in the hands of the operator at the controls of the System. The Drafting Team deleted TOP-002-2 R1 because they feel the BA only needs to respond to CPS and DCS. Does the BA only have responsibility for responding to CPS and DCS? How does the TOP meet its obligations without BA assistance? How about MVAR support? It is not realistic to require a TOP to issue a reliability directive to a BA, GOp, GO, DP, etc. each time it needs some assistance in preparing a plan for future system conditions. We request the Drafting Team reconsider the application of the "BA only needs to respond to CPS and DCS" concept and instead apply the measure of reliability of the BES as the litmus test for requirements. The Drafting Team deleted TOP-002-2 R2 as a good utility practice that is not measurable. We support this change since the TPL standards will support the interface between operations and planning. The Drafting Team deleted TOP-002-2 R3 as the LSE and GOP are governed by their Interconnection Operating Agreements. We are concerned with relying on agreements as a sole means of providing for BES Reliability. Reliability related behavior is best governed by reliability standards. Therefore, we request the drafting team reinstate R3 of TOP-002-2. In TOP-002-3 R1 and R2 the drafting team dropped the BA plan from the requirement. How will the TOP obtain information and assistance needed from the BA necessary to plan to meet scheduled system configuration in light of the fact that the work plan for these standards does not include any revisions to the BAL standards to require that support? The Drafting Team deleted TOP-002-2 R7. With this deletion, how will the BA's plan for energy reserves insure its deliverability without TOP assistance? The implementation plan does not include any revisions to the BAL standards to verify deliverability. This deletion seems to segment the planning activities too much to ensure reliability. The Drafting Team deleted TOP-002-2 R8 and R10. With this deletion, how does the TOP meet its voltage and reactive obligations without BA assistance? The implementation plan does not include any revisions to the BAL standards and CPS and DCS do not cover reactive support. What's left in the standards to ensure reactive capacity is available on generating units to support voltage needs? The Drafting Team deleted TOP-002-2 R18. This requirement should be retained and revised to state, "Neighboring BAs, TOPs, TOs, use identical Tie- line names based on terminal end facility names when referring to transmission facilities." The purpose of this requirement is to ensure Company A and Company B are sure they are talking about the same Tie-line. The Drafting Team deleted TOP-003-0 R1. This deletion eliminates the requirement for the GOp to provide outage data to the TOP. This requirement should be retained. The Drafting Team has developed this standard based on the changes planned or proposed for other standards. This standard should not be finalized until all other standards that these changes are based on have been regulatory approved in order to avoid creating a reliability gap through deletion of an existing

standard and the failed adoption of a proposed standard. TOP-004-3 R2 uses the term "Agreement" that is currently defined as "A contract or arrangement, either written or verbal and sometimes enforceable by law." Until the proposed revision to the definition of the term "Agreement" that would include "mutually agreed upon procedures and protocols" this requirement should be revised to state, "Top has Agreements or mutually agreed upon procedures or protocols with directly interconnected TOPs that specify switching of synchronous BES tie lines." TOP-003-1 R1 be revised to state, "Each Transmission Operator, Balancing Authority, Generator Operator, Generator Owner, Transmission Owner, Purchasing-Selling Entity, Load Serving Entity, and Distribution Provider shall provide all data requested in writing by the Transmission Operator or Balancing Authority using the periodicity and in the format requested." With the adoption of this change, TOP-003-1 R2, R3, and R5 could be dropped because R1 covers all entities and data requirements. In addition, with this change, the VRF for R1 should be changed to "High." The PSE should be added to the applicability of this requirement as they may have information that intermediary TOPs need concerning large magnitude near-term sales and purchase power transfers that are unconfirmed with a high probability of implementation that should be studied by operations planners for potential impacts on the reliability of the BES. The Drafting Team proposes to delete the TOP-006-1 R5, R6 and R7 as they are "covered by the certification process and no longer necessary." The certification program is being scaled back in part due to the reliability standards and the drafting team is removing requirements from the standards because the certification program covers it. We should not rely on programs outside of the reliability standards to provide for the reliability of the BES. These three requirements should be reinstated and revised to improve clarity and measurability.

Group

MRO NERC Standards Review Subcommittee

Jim Haigh

WAPA

Yes

Yes

Yes

Yes

No

This question is not consistent with TOP-004-2 M1, you either need the report or the data. You should be able to prove compliance with the report, stating absence of an IROL Violation Report in the question does not make sense.

Yes

No

1. The measures seem to repeat the requirements perhaps this could be avoided since additional detail in the measures are not enforceable only the requirements are. 2. In the standard TOP-001-2 the retention period for requirement 5 and measure 5 is longer than required for R1 through R4, what is the reasoning for this? 3. In the standard TOP-001-2, there is no retention period given for requirement 6 and measure 6. 4. In all of the standards and in the last sentence of the section "1.4 Data Retention", isn't it extreme to retain "all" requested and submitted subsequent audit records? 5. In the standard TOP-002-3, requirement 3 depends on requirement 2 but these requirements don't have the same retention period, should they? 6. Measure 5 of the standard TOP-003-1 references requirement 9, shouldn't it reference requirement 5? 7. In the standard TOP-003-1, the retention periods for R4/M4 and R5/M5 are only for 90 calendar days but the rest of the requirements have a retention period for 3 years, shouldn't R4/M4 and R5/M5 have the same retention period as the rest of the requirements in this standard? 8. The MRO has concerns about storing large amounts of real-time data. In TOP-003-01, should R1, R4, and R5 data retention be set at 90 days? 9. In the standard TOP-004-3, M2's last sentence references the text "confirmation". What is needed for confirmation? Would a signature page be an example?

No

1. For the TOP-001-2 VSLs for R1, these VSLs should be reworded because complying to the requirement would meet those VSLs. The MRO would suggest replacing "unless" with an "and" plus change the trailing text to read "â€¦ the respective entity did not inform the transmission operator â€¦". 2. For the TOP-001-2 VSLs for R2, what about the situation where the transmission operator did inform the RC and the affected TOP of a real-time emergency condition on an occasion but the notification was after the disconnection of switches? 3. For the TOP-001-2

VSLs for R4, what if the TOP or GOP does not coordinate because of system conditions. Is it possible that those entities might disagree as to what is a system condition? How would this disagreement be handled? 4. For the TOP-001-2 VSLs for R6, the timing is only one element of the evidence. These VSLs should be rewritten because the VSLs add to the requirement. The VSL should be changed to replace "the timing of when it acted" with "its actions" plus, add the text "when it" between the words "or" and "directed others".

Yes

Yes

Yes

Yes

In standard TOP-004-3 and in section "1.5 Additional Compliance Information", what if you don't meet this reporting process? What will happen?

Individual

Rick White

Northeast Utilities

Yes

Yes

No

We do not believe that the TOP informing the RC of every SOL exceedance should be required, and would not facilitate preserving reliability. Suggest removing "or SOL" from the requirement.

No

Suggest adding the words "such as P/SSE, power flow, etc." to the definition after the word "models". This might help to clarify the intent. Ending the definition after the word "responses" would make it a cleaner definition. Additionally, the defined term is "Simulated Contingencies". R1 uses the term "Simulated Contingency". This should be reconciled by either changing the defined term, or R1 should use the defined term and drop the word "events" from the end of the sentence.

Yes

We agree that having evidence of non-events has little value.

No

TOP-002 - Raise R1 from Low to Medium.

Yes

Yes

Yes

Yes

No

No

Group

ITCTransmission

Michael Ayotte

ITCTransmission

Yes

Yes

No

Presumably the RC should be aware when an SOL has been exceeded by their own EMS and contingency analysis program.

No

Suggest using the phrase "potential contingency" rather than "simulated contingency".

Yes

Yes

No

In TOP-001, the majority of retention requirements are current year plus one, except one is 3 years and one isn't specified. All retention requirements in this standard should be the same. In TOP-002 M1 add operating plans or guides as evidence that an assessment was performed. In TOP-002 retention requirements should be the same for all requirements.

No

TOP-001 R1 Failure to follow a directive one even one occasion without reason should be treated as a severe VSL, similar to R3. TOP-002 R1 & R2 VSL should not be severe, there should be VSLs at all levels. It is not logical to have a severe VSL for not performing a day ahead analysis,

and a Lower VSL for not following a reliability directive. TOP-004 R4 should have VSL for all levels, similar to R2,R3

Yes

Yes

No

Yes

TOP-001 R2 the phrase "disconnections prior to switching" needs to be clarified. Does this refer to individual facilities or complete disconnection from an interconnection? TOP-001 R3 It would be helpful to have a definition of 'emergency', recognizing this is a broader issue than just this standard. TOP-003 R1 It is unclear who is this data exchange requirement is applicable to. By reading on to R2 and R3, one can assume the intended audience, however the requirement should be written to clear as a standalone item. TOP-004 R1 This requirement should be incorporated into TOP-001, as it logically flows from the requirements there. This would facilitate possible eliminate of TOP-004 altogether. TOP-004 R2 The phrase "specify switching" is unclear. Believe this is an unnecessary requirement as TOP-001 R4 already requires the coordination of operations.

Group

IRC Standards Review Committee

Charles Yeung

Southwest Power Pool

Yes

We agree with the change. The drafting team could address the timeliness of actions in the VSLs. If directed by the FERC to maintain the language, we suggest the wording to be "as soon as possible but within the time limitation of the associated SOL".

Yes

SOLs should be mitigated within their equipment time limits. Though we are not prepared to propose a specific time period due to the limited time to provide comments on such a complex issue, we ask that the SDT work with industry to develop an appropriate time period that is measurable and propose it for consideration. The procedures should give appropriate consideration to consequences that are more severe than the violation.

No

We suggest using the term "potential contingencies" and avoid coming up with a new definition. The proposed definition is unclear and will lead to confusion.

Yes

We agree that having evidence of proof for non-events does not make sense. These are eventtriggered

standards and the focus should be to have evidence of compliance when an event in which compliance was required occurred. Some would argue that evidence is needed because a TOP could fail to report an event. It should be kept in mind that a TOP that fails to report a violation would also be able to manipulate data to show continuous compliance.

No

TOP-001 R1: A High VRF may not be appropriate in all cases. There are some directives that relate to local limits that would by no means result in cascading outages or instability. Perhaps the VSL matrix should assign a low VSL for non IROL directives. R2: We are unable to assess the VRF for this requirement since we do not understand the meaning of "potential impacts caused by disconnections prior to switching." R3: We do not necessarily agree with a High VRF for the same reason as for R1, unless the VSL matrix addresses the difference between extreme events and local issues. TOP-002 R1: We suggest raising the VRF for R1 to a Medium. TOP-003 R5: Should perhaps be elevated to Medium if the measure were more specific. An entity can't prove the negative (prove you've provided data to every entity that requested it). The measure and VSL should deal with a complaint being submitted by an operating entity that did not get the data it needed and requested.

No

In general, TOP-001 is an event triggered standard. For example, a limit is violated and not corrected, an entity failed to followed a directive, etc.. Since it's impossible to prove the negative when there isn't an event, what these measures will cause is entities to pass requests around to get statements from others to have something to show an auditor. TOP-003 It should be acceptable (rather that keeping evidence that each entity was sent a specification) that the specification be available to an accessible site and that the entities were made aware of its

location. The measures should revolve around failure to obtain or provide data and either an event occurred or a complaint arose.

No

In general, these are binary requirements. An entity followed a directive or not, data was provided or it was not, a study was done or it was not. The true fix is to develop a sanctions matrix that deals with binary requirements rather than coming up with subjective ways to measure something that is yes/no. That said, we would not recommend spending a great deal of time making modifications, as there will most likely be an order directing modifications once the standard is filed.

Yes

Yes

No

Yes

We appreciate this as a first effort in reducing the redundancy in the VO standards. There should be some clarity in the use of the term SOL in these standards. According to the NERC Glossary, SOLs include both IROLs and local facility limits. These standards use SOL in the context of only a local facility limit. The temporary exceedance of local facility limit (within the time limitations of the rating) should not be construed to be a violation in these standards. Failure to correct a local facility limit to the point where it leads to an IROL or damages equipment should be a violation. Records should only be maintained if the local limit is exceeded and not corrected within the allowable time of the limit. The record keeping required for non-violations in these standards is unnecessary.

Individual

Jason Shaver

American Transmission Company

Yes

Yes

Yes

No

The phrase "Simulated Contingency" should be replaced with a more concrete concept. ATC suggest that the SDT link the requirement to FAC-011. The purpose of FAC-011 is to ensure that SOLs used in the reliability operations of the BES are determined based on an established SOL methodology.

Yes

Yes

Yes

No

TOP-001-2 VSL: VSLs for R1 and R2 are written for when an entity does not follow a directive multiple times. Per FERC VSL should be based on the single non-compliance event. ATC suggest that the VSLs be re-written based on FERC guidelines. VSLs for R5 and R6 are based on the entity not having evidence of compliance not on the fact that they did not comply with the requirement. ATC suggest that the VSL be rewritten in order to address the requirement not the evidence to support the requirement. VSL for TOP-002-3 Requirement 3: If in a plan you identify one reliability entity and fail to notify that entity what is the VSL level that will be assigned. This seems to fall in both Lower and Severe. ATC believes that the VSL's should only have a single method for determining the VSL level in order to prevent conflicting determinations.

Yes

Yes

No

Yes

TOP-001-2 Requirement 2: First Concern: NERC Definition for Emergency: "Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System" ATC's believe that anticipating an abnormal system condition that could result in an Emergency would be very difficult to certify compliance. It's our position that the requirement should be limited to actual Real-Time Emergency conditions. If the SDT disagrees than we request information on how a company could certify compliance on its ability to anticipate an emergency. Second Concern: Currently the requirement requires notification of an automatic or immediate manual action prior to the action for an Emergency. We believe that

notification prior to switching may put the system and/or equipment at a greater level of risk. The requirement should contain language that states notification should be done "if time permits" otherwise it should be done following the action. TOP-001-2 Requirement 4: What is the minimum level of "affect" that requires communication? TOP-002-3 Requirement 1: Would a single assessment of next day's operation satisfy this requirement? or, Is the requirement asking for multiple next day operations to account for load changes expected throughout the day?