

Consideration of Comments on First Draft of Revised TOP Standards Real-time Operations — Project 2007-03

The Standards Committee thanks all commenters who submitted comments on the 1st draft of the revised TOP standards, Real-time Operations Project. These standards were posted for a 45-day public comment period from October 7, 2008 through November 20, 2008. The stakeholders were asked to provide feedback on the SAR through a special Standard Comment Form. There were more than 26 sets of comments, including comments from more than 90 different people from approximately 50 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Real-time_Operations_Project_2007-03.html

The SDT is recommending that the standards be re-posted to allow for feedback on the changes made due to industry comments to the first posting.

Changes have been made to the following:

- TOP-001-2 & TOP-003-1 Purpose statements
- Requirements:
 - TOP-001-2: R1, R2, R3, R4, and R7
 - TOP-002-3: R1, R2, and R3
 - TOP-003-1: R1, R4, and R5
 - TOP-004-3, R2
- Measures:
 - TOP-001-2, M1, M2, M3, M4, and M7
 - TOP-003-1, M1, and M4
 - TOP-004-3, M2
- Data retention:
 - TOP-001-2, R1 through R7
 - TOP-002-3, R3
 - Top-003-1, R1, R4, and R5
- VSLs:
 - TOP-001-2, R1, R3, R4, and R6
 - TOP-002-3, R1 and R3
 - TOP-003-1, R1, R2, R3, and R4
 - TOP-004-3, R1 and R2
- In addition, two bullets were added to TOP-003-1, Requirement R1.1 to address directives in FERC Order 693.

Definitions:

- Deleted the definition of "Simulated Contingencies" as stakeholders indicated the definition is not needed.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

Index to Questions, Comments, and Responses

1. The SDT has deleted the phrase ‘without intentional delay’ from all situations that require specific actions or responses as it was felt that this term is unmeasurable and that operator action and response in a timely manner is part of good utility practice and common sense. Do you agree with this change? If not, please provide specific suggestions for improvement.10
2. The SDT has eliminated SOLs from TOP-004-2, Requirement R1. The SDT felt that requiring a TOP to operate within all SOLs could effectively reduce the TOPs operational flexibility by eliminating the 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. The SDT determined that operating within each IROL and its IROL T_v was the reliability issue in this requirement. Do you agree with deleting the language about SOLs in TOP-004-2, Requirement R1? If not, please provide specific suggestions for improvement.13
3. The SDT is concerned about the inclusion of SOL in TOP-001-2, Requirement R5. The SDT thinks that the TOP notifying its RC of every SOL that has been exceeded may create an overload of messages for the RC that does not facilitate preserving reliability. Do you agree that SOL should remain in this requirement? If not, please provide specific suggestions for improvement.17
4. TOP-002-3 Requirement R1 uses the new proposed term Simulated Contingency. The term’s use is intended to clarify that the Contingencies used in the next day assessment are intended to model Contingencies that could occur based on the projected System topology and not Contingencies that have actually occurred on the System. The SDT is concerned that the definition may inadvertently lead the reader to believe that a power System simulator is required. Do you believe that the definition and term accomplish the intention of clarifying TOP-002-3 Requirement R1 without confusing the reading into believing a power System simulator is required? If not, please suggest alternative wording for TOP-002-3 Requirement R1 that communicates the SDT’s intent.21
5. TOP-004-2, Measure M1: The SDT has adopted the position for this measure and others like it that the absence of an IROL Violation Report is a sufficient measure as opposed to retaining massive amounts of data for later audit. Do you agree with this assessment? If not, please provide specific suggestions for improvement.26
6. The SDT has included VRFs and Time Horizons with this posting. Do you agree with the assignments that have been made? If not, please make specific suggestions for improvement.29
7. The SDT has included Measures and Data Retention with this posting. Do you agree with the assignments that have been made? If not, please make specific suggestions for improvement.37
8. The SDT has included compliance elements including VSL for this posting. Do you agree with the assignments that have been made? If not, please provide specific suggestions for change.44
9. The SDT has provided an Implementation Plan with this posting. Do you agree with the implementation timeframes? If not, please provide specific suggestions for improvement.61
10. The SDT is recommending retirement of TOP-005-1, TOP-006-1, TOP-007-0, TOP-008-0, and PER-001-0. Do you agree with these retirements? If not, please provide specific reasons for your position.64

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- 11. If you are aware of any regional variances or any conflicts between the proposed standards and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement that would be required as a result of these standards, please identify them here.71
- 12. Are there any other issues that need to be addressed? Please be specific.73

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Commenter		Organization	Industry Segment																	
			1	2	3	4	5	6	7	8	9	10								
1.	Guy Zito	NPCC																		✓
	Additional Member	Additional Organization	Region																	
1.	Ralph Rufrano	New York Power Authority	NPCC	5																
2.	Roger Champagne	Hydro-Quebec TransEnergie	NPCC	2																
3.	Mike Gildea	Constellation Energy		6																
4.	Greg Campoli	New York Independent System Operator	NPCC	2																
5.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
6.	Chris De Graffenried	Consolidated Edison Company of New York, Inc.	NPCC	1																
7.	Don Nelson	Massachusetts Dept. of Public Utilities	NPCC	9																
8.	Brian Evans-Mongeon	Utility Services, LLC	NPCC	6																
9.	Brian Gooder	Ontario Power Generation Incorporated	NPCC	5																
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1																
11.	Lee Pedowicz	NPCC	NPCC	10																
12.	Kathleen Goodman	ISO - New England	NPCC	2																
2.	Terry L. Blackwell	Santee Cooper		✓																

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Commenter	Organization	Industry Segment									
		1	2	3	4	5	6	7	8	9	10
		Additional Member		Additional Organization		Region		Segment Selection			
1.	S. T. Abrams	Santee Cooper	SERC	1							
2.	Glenn Stephens	Santee Cooper	SERC	1							
3.	Jim Peterson	Santee Cooper	SERC	1							
4.	Vicky Budreau	Santee Cooper	SERC	1							
5.	Kristi Boland	Santee Cooper	SERC	1							
6.	Rene' Free	Santee Cooper	SERC	1							
3.	Jim Griffith	SERC OC Standards Review Group	✓		✓		✓				
		Additional Member		Additional Organization		Region		Segment Selection			
1.	Jeff Brown	Big Rivers Electric Cooperative	SERC	1, 3, 5							
2.	Robert Thomasson	Big Rivers Electric Cooperative	SERC	1, 3, 5							
3.	Raleigh Nobles	Georgia System Operations Corp.	SERC	3							
4.	Sam Holeman	Duke Energy Carolinas	SERC	1, 3, 5							
5.	Greg Rowland	Duke Energy Carolinas	SERC	1, 3, 5							
6.	Dan Jewell	Louisiana Generating, LLC	SERC	1, 3, 5							
7.	Jason Marshall	MISO	SERC	2							
8.	Larry Rodriguez	Entegra Power Group;	SERC	5							
9.	Melinda Montgomery	Entergy	SERC	1, 3, 5							
10.	Jim Case	Entergy	SERC	1, 3, 5							
11.	John Troha	SERC	SERC	10							
4.	Patrick Brown	PJM Interconnection		✓							
		Additional Member		Additional Organization		Region		Segment Selection			
1.	Al DiCaprio	PJM interconnection	RFC	2							
5.	Louis Slade	Dominion - Electric Market Policy			✓		✓	✓			

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Commenter	Organization	Industry Segment									
		1	2	3	4	5	6	7	8	9	10
Additional Member	Additional Organization	Region	Segment Selection								
1. Jalal Babik		NA - Not Applicable	3, 5, 6								
2. Mike Garton		NA - Not Applicable	3, 5, 6								
6.	Roman Carter	Southern Company Transmission	✓								
Additional Member	Additional Organization	Region	Segment Selection								
1. Chris Wilson	Southern Transmission	SERC	1								
2. Terry Coggins	Southern Transmission	SERC	1								
3. JT Wood	Southern Transmission	SERC	1								
4. Jim Busbin	Southern Transmission	SERC	1								
5. Mike Oatts	Southern Transmission	SERC	1								
6. Jim Viikansalo	Southern Transmission	SERC	1								
7. Dushaune Carter	Southern Transmission	SERC	1								
7.	Denise Koehn	Bonneville Power Administration	✓		✓			✓			
Additional Member	Additional Organization	Region	Segment Selection								
1. Ted Snodgrass	Transmission Dispatch	WECC	1								
2. Jim Burns	Transmission Technical Operations	WECC	1								
8.	Jason Marshall	Midwest ISO Stakeholders Standards Collaborators		✓							
Additional Member	Additional Organization	Region	Segment Selection								
1. Jim Cyrulewski	JDRJC Associates	RFC	8								
9.	Dave Folk	FirstEnergy	✓		✓		✓	✓			
Additional Member	Additional Organization	Region	Segment Selection								
1. Doug Hohlbaugh	FirstEnergy	RFC	1, 3, 5, 6								
2. Sam Ciccone	FirstEnergy	RFC	1, 3, 5, 6								
3. John Martinez	FirstEnergy	RFC	1								
4. Steve Megay	FirstEnergy	RFC	1								

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Commenter		Organization		Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
10.	Jim Haigh	MRO NERC Standards Review Subcommittee		✓						✓				
Additional Member Additional Organization Region Segment Selection														
1.	Neal Balu	WPS	MRO	3, 4, 5, 6										
2.	Terry Bilke	MISO	MRO	2										
3.	Carol Gerou	MP	MRO	1, 3, 5, 6										
4.	Charles Lawrence	ATC	MRO	1										
5.	Ken Goldsmith	ALTW	MRO	4										
6.	Terry Harbour	MEC	MRO	1, 3, 5, 6										
7.	Pam Sordet	XCEL	MRO	1, 3, 5, 6										
8.	Dave Rudolph	BEPC	MRO	1, 3, 5, 6										
9.	Eric Ruskamp	LES	MRO	1, 3, 5, 6										
10.	Joseph Knight	GRE	MRO	1, 3, 5, 6										
11.	Joe Depoorter	MGE	MRO	3, 4, 5, 6										
12.	Larry Brusseau	MRO	MRO	10										
13.	Michael Brytowski	MRO	MRO	10										
11.	Michael Ayotte	ITC Transmission		✓										
12.	Charles Yeung	IRC Standards Review Committee			✓									
Additional Member Additional Organization Region Segment Selection														
1.	Patrick Brown	PJM	NPCC	2										
2.	Jim Castle	NYISO	NPCC	2										
3.	Matt Goldberg	ISONE	NPCC	2										
4.	Lourdes Estrada-Saliner	CAISO	WECC	2										
5.	Anita Lee	AESO	WECC	2										
6.	Steve Myers	ERCOT	ERCOT	2										
7.	Bill Phillips	MISO	RFC	2										
8.	Dan Rochester	IESO	NPCC	2										

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
13.	Cleyton Tewksbury	Montenay Power Corp.					✓							
14.	John McCawley	PECO Energy	✓		✓									
15.	Craig McLean	Manitoba Hydro	✓		✓		✓	✓						
16.	Scott Berry	Indiana Municipal Power Agency				✓								
17.	Jianmei Chai	Consumers Energy Company			✓	✓	✓							
18.	Kirit Shah	Ameren	✓		✓		✓	✓						
19.	Darryl Curtis	Oncor Electric Delivery	✓											
20.	Will Franklin	Energy System Planning & Operations (Gen & Mktg)							✓					
21.	Edward J Davis	Energy Services	✓		✓		✓	✓						
22.	Dan Rochester	Independent Electricity System Operator		✓										
23.	Greg Rowland	Duke Energy	✓		✓		✓	✓						
24.	Thad Ness	AEP	✓		✓		✓	✓						
25.	Rick White	Northeast Utilities	✓											
26.	Jason Shaver	American Transmission Company	✓											

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1. The SDT has deleted the phrase ‘without intentional delay’ from all situations that require specific actions or responses as it was felt that this term is unmeasurable and that operator action and response in a timely manner is part of good utility practice and common sense. Do you agree with this change? If not, please provide specific suggestions for improvement.

Summary Consideration:

The majority of respondents agreed with the deletion of the phrase ‘without intentional delay’ and thus no changes have been made to the standard.

Organization	Yes or No	Question 1 Comment
ISO-NE NPCC	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 reording to "as soon as possible but not more than..."
ISO-NE	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".
<p>Response: The use of the term “without intentional delay” was used in context with how quickly the responsible entity acts and not how quickly its actions achieved the desired response. Your suggestion appears to attempt to time bound the amount of time it takes to achieve results from the actions taken by the responsible entity. Thus, the SDT does not agree with your suggestion. Additionally, the definition of SOL does not include a time limit.</p>		
IRC Standards ISO-NE NPCC Review Committee	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".
<p>Response: The SDT does not believe that timeliness should be addressed in the VSLs unless there is a clear measurable requirement for timeliness. The Commission established in their VSL order several guidelines, one of which requires that VSLs do not add to the requirement. Establishing timeliness in the VSLs when there is not a clear measurable requirement for timeliness would thus violate the Commission’s guideline.</p>		
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 changed 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.

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Organization	Yes or No	Question 1 Comment
<p>Response: While the SDT agrees with your point that entities would want guidance on what is timely and agree that the extreme example of six months would be far too long, the SDT noticed that you have not suggested a time requirement. Thus, the SDT concludes that you must have detected the problems with establishing a time requirement. Some of the problems include that what is timely in one situation and one applicable entity may ultimately vary with another. Thus, setting a specific time requirement that is measurable and usable in all situations is not appropriate. The SDT also agrees that it is not desirable to leave the interpretation of what is timely up to the compliance auditors but do not see a better way. Applicable entities will have to work with their TOP to assess what their expectations are as far as timeliness.</p>		
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.
<p>Response: This is the only comment that was received in this regard and the SDT (and the remainder of the industry as seen from comments received) continues to believe that removing the phrase is correct for TOP standards.</p>		
Santee Cooper	Yes	
SERC OC Standards Review Group	Yes	This phrase is not measureable!
PJM InterconnectiC OC Standaon	Yes	PJM supports the deletion and recognizes the problem in measuring "intent".
Dominion - Electric Market Policy	Yes	
Southern Company Transmission	Yes	
Bonneville Power Administration	Yes	
Midwest ISO Stakholders Standards Collaborators	Yes	Intent is an enforcement issue. Thus, it does not belong in the standard.

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Organization	Yes or No	Question 1 Comment
FirstEnergy	Yes	
MRO NERC Standards Review Subcommittee	Yes	
ITC Transmission	Yes	
Montenay Power Corp.	Yes	
Manitoba Hydro	Yes	
Consumers Energy Company	Yes	
Ameren	Yes	
Oncor Electric Delivery	Yes	
Entergy System Planning & Operations (Gen & Mktg)	Yes	
Duke Energy	Yes	
AEP	Yes	
Northeast Utilities	Yes	
American Transmission Company	Yes	
<p>Response: Thank you for your response.</p>		

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2. The SDT has eliminated SOLs from TOP-004-2, Requirement R1. The SDT felt that requiring a TOP to operate within all SOLs could effectively reduce the TOPs operational flexibility by eliminating the 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. The SDT determined that operating within each IROL and its IROL T_v was the reliability issue in this requirement. Do you agree with deleting the language about SOLs in TOP-004-2, Requirement R1? If not, please provide specific suggestions for improvement.

Summary Consideration:

There was a general consensus amongst responders that the elimination was appropriate.

Organization	Yes or No	Question 2 Comment
SERC OC Standards Review Group	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.
Response: The SDT agrees with you that the TOPs should not de-emphasize resolving or mitigating SOLs and do not believe the revised standard does this.		
Midwest ISO Stakeholders Standards Collaborators	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?
Response: IROLs must be determined by studies. To the extent that a TOP has an expectation that an SOL might be exceeded, the TOP and RC are obligated to verify that an IROL will not be exceeded. In other words, when determining the operating region, the TOP and RC must be aware of both the SOL operating region and the IROL operating region. Honoring every SOL could present problems to the TOP where they may have to choose to violate another requirement to meet the requirement to operate within all SOLs. For example, when two or more limits are in danger of violation, and mitigating one would exacerbate the other, the TOP clearly is faced with a reliability and compliance conundrum. Under the SDT's proposal, however, the TOP has the opportunity to monitor the status of the systems and make the wisest possible choice to preserve reliability. The SDT feels that the FAC standards address thermal limits.		
Independent Electricity System Operator	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 the 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."

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Organization	Yes or No	Question 2 Comment
		<p>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?</p> <p>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?</p> <p>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.</p> <p>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.</p>
<p>Response: Your initial argument that exceeding an SOL may be the point where “system voltage may be depressed” focus on the subset of SOLs that are IROLs. There is an explicit requirement still in the proposed standards to operate within IROLs. Thus, the only SOLs that these proposed draft standards do require a TOP to operate within are those that exclude the IROL subset.</p> <p>The SDT does not believe that the proposed TOP standards conflict with the FAC-014 standard. Determining SOLs is required to operate the System and SOLs will be operated within in most instances. However, SOLs do not represent limits that if exceeded could cause cascading, uncontrolled outages or blackouts. Furthermore, part of the purpose of FAC-014 is to communicate your SOLs to other entities so that they can respect your operational limits.</p>		
IRC Standards Review Committee	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

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Organization	Yes or No	Question 2 Comment
		give appropriate consideration to consequences that are more severe than the violation.
<p>Response: SOLs may be based on equipment time limits but by definition there is not an associated T_v and any decision to associate a time limit with the SOL to protect the equipment from damage is an independent operational decision that is made by the TOP and TO. Thus, the SDT does not believe it is necessary to establish a time limit.</p>		
AEP	Yes	<p>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.</p> <p>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.</p>
<p>Response: Purpose statement – No other comments were received and the SDT feels that the changes properly reflect what was changed in the standard so no changes made.</p> <p>Prioritization or largest SOL – Most commenters support the removal of SOLs. Therefore, no change is required.</p>		
ISO-NE	Yes	SOLs should be mitigated within a defined time period with appropriate consideration to the consequences
NPCC	Yes	
Santee Cooper	Yes	
PJM Interconnection	Yes	The SDT has correctly balanced the need for flexible responses to non-impactive problems.
Dominion - Electric Market Policy	Yes	
Southern Company Transmission	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	

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Organization	Yes or No	Question 2 Comment
MRO NERC Standards Review Subcommittee	Yes	
ITC Transmission	Yes	
Manitoba Hydro	Yes	
Consumers Energy Company	Yes	
Ameren	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.
Oncor Electric Delivery	Yes	
Entergy Services	Yes	We agree as this was the original intention of the NERC OLDTF that first developed the terms SOL and IROL.
Duke Energy	Yes	We agree with the SDT's logic in eliminating SOLs from TOP-004-2 Requirement R1.
Northeast Utilities	Yes	
American Transmission Company	Yes	
Response: Thank you for your response.		

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3. The SDT is concerned about the inclusion of SOL in TOP-001-2, Requirement R5. The SDT thinks that the TOP notifying its RC of every SOL that has been exceeded may create an overload of messages for the RC that does not facilitate preserving reliability. Do you agree that SOL should remain in this requirement? If not, please provide specific suggestions for improvement.

Summary Consideration:

This question was poorly worded and as a result the commenters may have been led astray. The consensus of the industry at this point is that not all SOLs need to be reported but that some subset of them should. The SDT will re-phrase the question in the second posting so that the intent is clear and so that a definitive position on the issue can be established.

Organization	Yes or No	Question 3 Comment
NPCC	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.
ISO-NE	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.
Santee Cooper	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.
SERC OC Standards Review Group	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.
Manitoba Hydro	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.
PJM Interconnection	No	The issue here is in defining what is impactful 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 non-relevant information can be more than distracting it can needlessly tie up people

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Organization	Yes or No	Question 3 Comment
		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.
Dominion - Electric Market Policy	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.
Southern Company Transmission	No	Requirement 2 of TOP-001-2 already contains a provision for the TOP to inform its RC of real-time 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.
Ameren	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 ?."
Midwest ISO Stakeholders Standards Collaborators	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 real-time 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 every time an SOL is violated even when no mitigation is taken.
FirstEnergy	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.
ITC Transmission	No	Presumably the RC should be aware when an SOL has been exceeded by their own EMS and contingency analysis program.

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Organization	Yes or No	Question 3 Comment
Montenay Power Corp.	No	
Ameren	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 ?."
Entergy System Planning & Operations (Gen & Mktg)	No	The RC should be aware of SOL exceedances in order to perform their function and maintain situational awareness.
Entergy Services	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.
Independent Electricity System Operator	Yes	SOLs are intended to ensure reliable 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 exceedances to occur so frequently that reporting to the RC will create an overload of messages.
Northeast Utilities	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.
Duke Energy	Yes	R5 should be revised to also require the TOP to notify the RC of the particular IROL or SOL that has been exceeded.
AEP	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.
<p>Response: This question was poorly worded and as a result the commenters may have been led astray. The consensus of the industry at this point is that not all SOLs need to be reported but that some subset of them should. The SDT will re-phrase the question in the second posting so that the intent is clear and so that a definitive position on the issue can be established.</p>		
Bonneville Power Administration	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?

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Organization	Yes or No	Question 3 Comment
<p>Response: The SDT believes that it could be moved and be equally effective however this is the only comment received on this matter so the SDT is not going to make a change.</p>		
American Transmission Company	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Consumers Energy Company	Yes	
Oncor Electric Delivery	Yes	
<p>Response: Thank you for your response.</p>		

4. TOP-002-3 Requirement R1 uses the new proposed term Simulated Contingency. The term’s use is intended to clarify that the Contingencies used in the next day assessment are intended to model Contingencies that could occur based on the projected System topology and not Contingencies that have actually occurred on the System. The SDT is concerned that the definition may inadvertently lead the reader to believe that a power System simulator is required. Do you believe that the definition and term accomplish the intention of clarifying TOP-002-3 Requirement R1 without confusing the reader into believing a power System simulator is required? If not, please suggest alternative wording for TOP-002-3 Requirement R1 that communicates the SDT’s intent.

Summary Consideration:

After review of all comments received, the SDT believes that the addition of the definition is not necessary. Accordingly, the definition will be eliminated and the wording of TOP-002-3, Requirement R1 has been revised accordingly.

TOP-002-3, R1: 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 potential Contingency events. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

Organization	Yes or No	Question 4 Comment
NPCC	No	Change the definition of Simulated Contingencies to: "The act of using planning and operating models to replicate Contingency responses."
Santee Cooper	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.
Oncor Electric Delivery	No	"Study Contingency" may be a better choice and would remove the possible link between simulator and simulated contingency
American Transmission Company	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.
<p>Response: The definition was intended to indicate that, although studies are not required for an assessment, the assessment should include all expected results from the System response to Contingencies which had been modeled in the development of System Operating Limits. The methodology of developing the SOLs includes the Contingencies that are to be considered in the development of those limits. The SDT has revised the wording of Requirement R1 to simplify and clarify</p>		

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Organization	Yes or No	Question 4 Comment
<p>expectations.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
SERC OC Standards Review Group	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."
Duke Energy	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.
<p>Response: The SDT feels that the information you suggest is addressed in the required methodology to be used in the development of System Operating Limits. The definition was intended to indicate that, although studies are not required for an assessment, the assessment should include all expected results from the System response to Contingencies which had been modeled in the development of System Operating Limits. The methodology of developing the SOLs includes the Contingencies that are to be considered in the development of those limits. The SDT has revised the wording of Requirement R1 to simplify and clarify expectations.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
PJM Interconnection	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 post-contingency simulation becomes a problem, then a Standard Interpretation can be issued.
Southern Company Transmission	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 (SOL's) 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.
Bonneville Power Administration	No	Change the definition from "design considerations" to "planned outages".
<p>Response: After reviewing all comments submitted, the SDT agrees that the definition seems to lack needed clarity. The definition was intended to indicate that,</p>		

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Organization	Yes or No	Question 4 Comment
<p>although studies are not required for an assessment, the assessment should include all expected results from the System response to Contingencies which had been modeled in the development of System Operating Limits. The methodology of developing the SOLs includes the Contingencies that are to be considered in the development of those limits. The SDT has revised the wording of Requirement R1 to simplify and clarify expectations.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
Dominion - Electric Market Policy	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."
<p>Response: The SDT believes that the existing purpose statement is appropriate and that required methodologies for determination of system operating limits include the concept of contingencies that could occur and the projected system topology. After reviewing all comments submitted, the SDT agrees that the definition seems to lack needed clarity The definition was intended to indicate that, although studies are not required for an assessment, the assessment should include all expected results from the System response to Contingencies which had been modeled in the development of System Operating Limits. The methodology of developing the SOLs includes the Contingencies that are to be considered in the development of those limits. The SDT has revised the wording of Requirement R1 to simplify and clarify expectations.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
Midwest ISO Stakeholders Standards Collaborators	No	Why can't you just use the term potential in front of Contingency?
ITC Transmission	No	Suggest using the phrase "potential contingency" rather than "simulated contingency".
ISO-NE	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.
IRC Standards Review Committee	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.
AEP	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".

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Organization	Yes or No	Question 4 Comment
<p>Response: After reviewing all comments submitted, the SDT agrees that the definition does not lend added clarity. Your suggestion is a good one. The SDT has revised the wording of TOP-002-3, Requirement R1.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
FirstEnergy	No	<p>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.</p>
Ameren	No	<p>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.</p>
<p>Response: After reviewing all comments submitted, the SDT agrees that the definition is not needed. The SDT has revised the wording of TOP-002-3, Requirement R1.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>As to what type of Contingency must be considered, the Transmission Operator is not limited to single Contingencies or bus faults but must study any and all conditions that may result in exceeding any of its System Operating Limits during anticipated normal conditions as stated in the Requirement. The potential Contingencies to be studied are limited to those spelled out in the TPL standard.</p>		
Entergy Services	No	<p>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."</p>
Independent Electricity System Operator	No	<p>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 understanding 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."</p>
<p>Response: After reviewing all comments submitted, the SDT believes that use of the term "potential Contingencies" is appropriate. The SDT will revise the wording</p>		

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Organization	Yes or No	Question 4 Comment
<p>of TOP-002-3, Requirement R1 to simplify and clarify.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning].</i></p>		
Northeast Utilities	No	<p>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.</p>
<p>Response: After reviewing all comments received, the SDT believes the definition does not lend needed clarity. Further, the SDT recognizes that an assessment does not necessarily require a study to be performed each time the assessment is made. The SDT agrees that a robust underlying power flow study or model effort may be a good basis for an assessment, but is not required in all cases. After reviewing all comments submitted, the SDT believes that use of the term "potential Contingencies" is appropriate. The SDT has revised the wording of TOP-002-3, Requirement R1 to simplify and clarify expectations.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
MRO NERC Standards Review Subcommittee	Yes	
Consumers Energy Company	Yes	
Entergy System Planning & Operations (Gen & Mktg)	Yes	<p>The definition of "Simulated Contingency" provides enough clarity to avoid confusion.</p>
<p>Response: Thank you for your response. Note that most commenters indicated that the definition wasn't needed or was unclear. After reviewing all comments submitted, the SDT believes that use of the term "potential Contingencies" is appropriate. The SDT has revised the wording of TOP-002-3, Requirement R1 to simplify and clarify expectations.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		

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5. TOP-004-2, Measure M1: The SDT has adopted the position for this measure and others like it that the absence of an IROL Violation Report is a sufficient measure as opposed to retaining massive amounts of data for later audit. Do you agree with this assessment? If not, please provide specific suggestions for improvement.

Summary Consideration:

The consensus of comments received from industry is in agreement with the SDT position so no changes were made.

Organization	Yes or No	Question 5 Comment
MRO NERC Standards Review Subcommittee	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.
Independent Electricity System Operator	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).
<p>Response: If there has been no IROL violation, then there will be no violation data. The SDT believes that requiring retention of massive amounts of normal operating data does not make sense. The SDT believes that IROL Violation Reports, and the required supporting information, serves the purpose. Absence of the report indicates there has been no violation.</p>		
Bonneville Power Administration	Yes	<p>SDT has cleaned up TOP-004-3 well, removing duplicate requirements from other standards.</p> <p>I don't believe R2 (Agreements of switching) is necessary since TOP-001-2 R3 appears to cover assisting to mitigate emergencies/IROLs.</p> <p>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.</p>
<p>Response: The SDT believes that you have raised a legitimate point on TOP-004-3, R2 and will raise a question in the next posting to see what the industry feels on this topic.</p> <p>The SDT believes that it could be moved and be equally effective however this is the only comment received on this matter so the SDT is not going to make a change</p>		
ISO-NE	Yes	We agree that having evidence of proof for non-events does not make sense. These are event-triggered standards and the focus should be to have evidence of compliance when an event in which compliance was required occurred. Some

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Organization	Yes or No	Question 5 Comment
		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.
IRC Standards Review Committee	Yes	We agree that having evidence of proof for non-events does not make sense. These are event-triggered 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.
NPCC	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.
Santee Cooper	Yes	
SERC OC Standards Review Group	Yes	
PJM Interconnection	Yes	
Dominion - Electric Market Policy	Yes	
Southern Company Transmission	Yes	
Midwest ISO Stakeholders Standards Collaborators	Yes	
FirstEnergy	Yes	
ITC Transmission	Yes	
Manitoba Hydro	Yes	
Consumers Energy	Yes	

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Organization	Yes or No	Question 5 Comment
Company		
Ameren	Yes	An absence is sufficient.
Oncor Electric Delivery	Yes	
Entergy System Planning & Operations (Gen & Mktg)	Yes	
Entergy Services	Yes	
Duke Energy	Yes	
Northeast Utilities	Yes	We agree that having evidence of non-events has little value.
American Transmission Company	Yes	
Response: Thank you for your response.		

6. The SDT has included VRFs and Time Horizons with this posting. Do you agree with the assignments that have been made? If not, please make specific suggestions for improvement.

Summary Consideration:

While the SDT appreciates the perspective of comments for increasing the proposed Violation Risk Factors for various Requirements, the position taken by the SDT was to recognize that these standards represent not best practices, but the threshold of performance below which warrants penalties; including the potential for very severe penalties. The SDT, therefore, drafted and continues to support the position that only non-performance which, in itself, creates an adverse impact on reliability warrants a high VRF. Further, specific non-performance which may exacerbate (but not cause) an adverse impact on reliability generally may not warrant a high VRF because absent the non-performance in the primary area of concern, an adverse impact to reliability would not exist or would be minimal.

In each case, the SDT adopted the most appropriate level of risk assignment. This was done considering the following:

1. Direct correlation of adverse impact to reliability through non-performance of the specific requirement,
2. Whether non-performance of the specific requirement represented less-than-best practice as opposed to or compared with inadequate performance that represents dereliction of duty or imposing burden on others and which warrants penalty (i.e., performance which is merely less than best practice, but still adequate for reliability should not create or exacerbate risk)
3. The timing or urgency for which the adverse impact to reliability could occur

The following changes were made due to industry comments:

TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions

TOP-002-3, R1: 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 potential Contingency events. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]

TOP-002-3, R2: The Transmission Operator shall plan to preclude operating in excess of any Interconnection Reliability Operating Limits (IROLs) including those identified as a result of the assessment performed in Requirement R1. [*Violation Risk Factor: High*] [*Time Horizon: Operations Planning*]

TOP-002-3, R3: The Transmission Operator shall notify all reliability entities identified in the plan(s) cited in Requirement R2 as to their role in the plan(s). [*Violation Risk Factor: High*] [*Time Horizon: Operations Planning*]

TOP-003-1, R5: Each Transmission Operator and Balancing Authority shall provide to other Transmission Operators and Balancing Authorities with immediate responsibility for operational reliability, the data requested by those other Transmission Operators and Balancing Authorities necessary for Real-time monitoring and reliability assessments. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning, Same-day Operations, Real-Time Operations*]

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Organization	Yes or No	Question 6 Comment
NPCC	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.
PJM Interconnection	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 then just an administrative requirement.
<p>Response: TOP-001: With no reasons provided for the suggested changes, the SDT doesn't have any basis for making these changes.</p> <p>TOP-002-3, R1: The SDT agrees. The VRF for Requirement R1 has been changed to Medium. The presumption was that while the TOP is required to meet R1 and, therefore, need not have additional requirements to tell <i>HOW</i> Requirement R1 is met. However, comments prompted further consideration. It is apparent that adjacent entities would not be able to meet Requirement R1 without information otherwise unknown to them. That lack of information in the Operations Planning timeframe could cause that planning to be flawed. Therefore, the SDT is increasing this VRF from low to medium.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
SERC OC Standards Review Group	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".
<p>Response: The SDT did not see a need for a different VRF for each Time Horizon.</p> <p>R5 - The SDT disagrees. It is important to advise the Reliability Coordinator of actions being taken to restore limits, etc. Absent such reporting and coordination, the chances increase that the RC may direct others to take actions which are either duplicative or counter to the actions being taken by the TOP to restore operations to within limits. Minimally, informing the RC of actions would enable the RC to assure that the event does not escalate. The risk created by not informing the RC of actions being taken warrants higher than a low VRF.</p> <p>TOP-002-3: The SDT agrees. The Time Horizons for Requirements R1 – R3 have been changed to Operations Planning.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>TOP-002-3, R2: The Transmission Operator shall plan to preclude operating in excess of any Interconnection Reliability Operating Limits (IROLs) including those identified as a result of the assessment performed in Requirement R1. <i>[Violation Risk Factor: High] [Time Horizon: Operations Planning]</i></p>		

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Organization	Yes or No	Question 6 Comment
<p>TOP-002-3, R3: The Transmission Operator shall notify all reliability entities identified in the plan(s) cited in Requirement R2 as to their role in the plan(s). <i>[Violation Risk Factor: High] [Time Horizon: Operations Planning]</i></p>		
<p>Dominion - Electric Market Policy</p>	<p>No</p>	<p>TOP-001-2 We believe that R5 and R7 warrant high VRF.</p> <p>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.</p> <p>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.</p> <p>The time horizon for R1-3 should be changed to Operations Planning</p>
<p>Response: TOP-001-2: With no reasons provided for the suggested changes, the SDT doesn't have any basis for making these changes</p> <p>TOP-002-3, R1: The SDT agrees. The VRF for Requirement R1 has been changed to Medium. However, comments prompted further consideration. It is apparent that adjacent entities would not be able to meet Requirement R1 without information otherwise unknown to them. That lack of information in the Operations Planning timeframe could cause that planning to be flawed. Therefore, the SDT is increasing this VRF from low to medium.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>TOP-002-3, R3: The SDT disagrees. While the burden for "bigger picture" (i.e., the heavier burden) may rest on the RC, communications are required from the TOP for any expected performance or awareness by any other entity included in the plan (includes RC). If conflicting performance expectations occur, or there is a need to revise plans based on the RC review of all respective TOPs plans, then these should be resolved by the RC, as noted in the cited IRO standard. But absent the sharing of this information, it is not clear how others (including the RC) would be made aware of plans (which can then be coordinated among TOPs by the RC as needed).</p> <p>TOP-002-3: The SDT agrees. The Time Horizons for Requirements R1 – R3 have been changed to Operations Planning.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>TOP-002-3, R2: The Transmission Operator shall plan to preclude operating in excess of any Interconnection Reliability Operating Limits (IROLs) including those identified as a result of the assessment performed in Requirement R1. <i>[Violation Risk Factor: High] [Time Horizon: Operations Planning]</i></p> <p>TOP-002-3, R3: The Transmission Operator shall notify all reliability entities identified in the plan(s) cited in Requirement R2 as to their role in the plan(s). <i>[Violation Risk Factor: High] [Time Horizon: Operations Planning]</i></p>		
<p>FirstEnergy</p>	<p>No</p>	<p>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.</p>

Organization	Yes or No	Question 6 Comment
		<p>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.</p> <p>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 then 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.</p> <p>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.</p>
<p>Response: TOP-001-2, R7: The SDT has deleted Requirement R7 as duplicative of IRO-05-3, Requirement R10.</p> <p>TOP-002-3, R4: There is no Requirement R4.</p> <p>TOP-002-3, R1: The SDT agrees. The VRF for Requirement R1 has been changed to Medium. However, comments prompted further consideration. It is apparent that adjacent entities would not be able to meet Requirement R1 without information otherwise unknown to them. That lack of information in the Operations Planning timeframe could cause that planning to be flawed. Therefore, the SDT is increasing this VRF from low to medium.</p> <p>TOP-002-3, R2: The SDT disagrees. Since IROLs are involved, the SDT feels that by definition the VRF must be high.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>TOP-003-1, R4 & R5: The SDT agrees. The VRF for Requirement R5 has been changed to Medium.</p> <p>TOP-003-1, R5: Each Transmission Operator and Balancing Authority shall provide to other Transmission Operators and Balancing Authorities with immediate responsibility for operational reliability, the data requested by those other Transmission Operators and Balancing Authorities necessary for Real-time monitoring and reliability assessments. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-day Operations, Real-Time Operations]</i></p>		
ISO-NE	No	<p>TOP-001R1: 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.</p> <p>R2: We are unable to assess the VRF for this requirement since we do not understand the meaning of "?potential impacts</p>

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Organization	Yes or No	Question 6 Comment
		<p>caused by disconnections prior to switching."</p> <p>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.</p> <p>TOP-002R1: We suggest raising the VRF for R1 to a Medium.</p> <p>TOP-003R5: 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.</p>
IRC Standards Review Committee	No	<p>TOP-001R1: 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.</p> <p>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."</p> <p>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.</p> <p>TOP-002R1: We suggest raising the VRF for R1 to a Medium.</p> <p>TOP-003R5: 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.</p>
Independent Electricity System Operator	No	<p>TOP-001R1: 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 rationalize how impactful a risk can be when an entity violates this requirement.</p> <p>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."</p> <p>R3: We do not agree with a High 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?</p> <p>TOP-002R1: We suggest raising the VRF for R1 to a Medium. Day ahead operational 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 limits and as such, is equally impactful, if not more impactful, than developing the limits themselves.</p>

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Organization	Yes or No	Question 6 Comment
		<p>TOP-003R5: 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.</p>
<p>Response: TOP-001-2, R1: The SDT disagrees. Directives should be followed. What is described here by the commenter is a need to provide better directives... but if a directive is given it must be presumed in Real-time to be needed, and must be followed. As appropriate after the fact, a review of the directive can be made with a goal toward higher quality directives. But in Real-time the SDT position is that if directives are not followed, a high risk to reliability is likely. Therefore, the SDT disagrees with the comment and no change has been made.</p> <p>TOP-001-2, R2: The intent of the phrase was to note one of the areas especially necessary to communicate (i.e., the opening of Interconnections or connections to generators, areas, etc). This is one of many things that need to be communicated if System conditions permit. Since this specific phrase was confusing to some, and since it describes only one of many possible conditions, the SDT has deleted the phrase.</p> <p>TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.</p> <p>TOP-001-2, R3: The SDT disagrees and has left the VRF as is. If emergency assistance is requested it should be rendered if available. If it is requested for improper reasons or is found to be a convenience rather than a necessity, then such a finding should be dealt with after the fact. But during the emergency period, requests should be honored (if possible without threatening life or property, or violating laws or other regulations, standards, etc.).</p> <p>TOP-002-3, R1: The SDT agrees. The VRF for Requirement R1 has been changed to Medium.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>TOP-003-1, R5: The SDT agrees. The VRF for Requirement R5 has been changed to Medium.</p> <p>TOP-003-1, R5: Each Transmission Operator and Balancing Authority shall provide to other Transmission Operators and Balancing Authorities with immediate responsibility for operational reliability, the data requested by those other Transmission Operators and Balancing Authorities necessary for Real-time monitoring and reliability assessments. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-day Operations, Real-Time Operations]</i></p>		
Entergy Services	No	<p>TOP-002-3 R1: VRF should be Medium since you can't do R2 or R3 without it.</p> <p>TOP-003-1 R5 - VRF should be Medium, the same as R4</p>
<p>Response: TOP-002-3, R1: The SDT agrees. The VRF for Requirement R1 has been changed to Medium.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p> <p>TOP-003-1, R5: The SDT agrees. The VRF for Requirement R5 has been changed to Medium.</p>		

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Organization	Yes or No	Question 6 Comment
<p>TOP-003-1, R5: Each Transmission Operator and Balancing Authority shall provide to other Transmission Operators and Balancing Authorities with immediate responsibility for operational reliability, the data requested by those other Transmission Operators and Balancing Authorities necessary for Real-time monitoring and reliability assessments. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-day Operations, Real-Time Operations]</i></p>		
Northeast Utilities	No	TOP-002 - Raise R1 from Low to Medium.
<p>Response: TOP-002-3, R1: The SDT agrees. The VRF for Requirement R1 has been changed to Medium.</p> <p>TOP-002-3, R1: 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 potential Contingency events. <i>[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</i></p>		
American Transmission Company	Yes	
Santee Cooper	Yes	
Southern Company Transmission	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Subcommittee	Yes	
ITC Transmission	Yes	
Montenay Power Corp.	Yes	
Manitoba Hydro	Yes	
Consumers Energy Company	Yes	
Ameren	Yes	

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Organization	Yes or No	Question 6 Comment
Oncor Electric Delivery	Yes	
Duke Energy	Yes	
Response: Thank you for your response.		

7. The SDT has included Measures and Data Retention with this posting. Do you agree with the assignments that have been made? If not, please make specific suggestions for improvement.

Summary Consideration:

While the majority of the commenters agreed with the parameters, the following changes have been made due to industry comments:

Since the data retention for all requirements was the same in TOP-001-2, the data retention requirements for each requirement and measure were deleted and replaced with the following:

TOP-001-2, data retention: The Balancing Authority, Transmission Operator, Distribution Provider, Load-Serving Entity, and Generator Operator shall each keep data or evidence to show compliance ~~as identified below~~ **for each applicable Requirement and Measure for the current calendar year and one previous calendar year** unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

TOP-002-3, M1. The Transmission Operator shall have evidence that it has assessed next day operations in accordance with Requirement R1. Such evidence could include but is not limited to dated power flow study results.

Since the data retention for all requirements was the same in TOP-002-3, the data retention requirements for each requirement and measure were deleted and replaced with the following:

TOP-002-3, data retention: The Transmission Operator shall keep data or evidence to show compliance for each Requirement and Measure for a rolling six month period unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

TOP-004-3, M2: Each Transmission Operator shall make available evidence that it has Agreements with directly interconnected Transmission Operators that specify switching of synchronous BES tie lines in accordance with Requirement R2. Such evidence could include but is not limited to a dated document with confirmation of the Agreement, such as a signature page or a memorandum of understanding, in electronic or hard copy format.

Organization	Yes or No	Question 7 Comment
NPCC	Yes	NPCC participant members agree provided that only the data specified is required to be dated, not the actual data.
<p>Response: The SDT feels that your comment is covered in TOP-003-1, R1.2 which states “a mutually agreed upon format” between the two entities. The specifics of the request for information will be agreed upon by the parties involved and dated accordingly.</p>		
Santee Cooper	No	OK with the measures and data retention with the exception of our concerns discussed in Question 12.
<p>Response: Thank you for your response and please see the response to question 12.</p>		

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Organization	Yes or No	Question 7 Comment
SERC OC Standards Review Group	No	If the changes suggested above are agreed to by the SDT, please make the appropriate corresponding changes to the measurements.
Independent Electricity System Operator	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.
Response: Please see the above responses.		
PJM Interconnection	No	TOP-003 M1-M5 - they all introduce a new requirement (i.e. the report be dated) - that requirement should be dropped from the measures.
<p>Response: M1 - The SDT believes that it is imperative to have dated documentation pertaining to all reliability related information that is passed on between operating entities. This is particularly true whenever system upgrades/changes are done or equipment ratings are changed. Adding the word 'dated' to the Measure does not alter the requirement and is only common sense.</p> <p>M2 – M5: 'Dated' is only employed here with respect to the use of operator logs as a type of evidence. This does not alter the requirement in any fashion and is simply a common sense statement.</p>		
Dominion - Electric Market Policy	No	<p>TOP-001-2 @M4 - We don't agree with the underlying requirement (see comment to question 12).</p> <p>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.</p> <p>TOP-002-3 @ M3 should be removed as we do not agree with underlying requirement (see comment to question 12).</p>
<p>Response: The SDT feels your comment about TOP-001-2, M4 really pertains to TOP-001-2, R4. The SDT believes that this requirement is necessary in order to keep other entities apprised of the status of a generator or plant when that status can directly impact the reliability of the BES. In many cases the RC or BA is not directly responsible for voltage control in a particular area. The TOP in these cases would most likely be the responsible party for monitoring and responding to area voltage concerns. If the GOP were not to advise the TOP in these cases about unit voltage control capability changes it could certainly impact the reliability of the BES.</p> <p>The SDT does not feel that measures M1 and M3 of TOP-001-2 are only associated with conditions of non-compliance. The measures are there to insure that entities simply show that they either complied with a directive or offered emergency assistance. If they couldn't comply for any of the reasons stated in Requirements R1 or R3 of TOP-001-2 they can show proof as to the reason why. The data retention times for both of these measures seems agreeable by all other responders, therefore</p>		

Organization	Yes or No	Question 7 Comment
		<p>the SDT will retain the retention periods as stated in the draft.</p> <p>The SDT feels your comment about TOP-002-3, M3 really pertains to TOP-002-3, R3. The SDT feels this requirement is necessary to insure all entities help in addressing a potential IROL limit and that each entity knows their specific role in the plan. The requirement and measures will remain as drafted.</p>
<p>MRO NERC Standards Review Subcommittee</p>	<p>No</p>	<ol style="list-style-type: none"> 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. 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?
<p>Response: 1. The SDT feels that the measures simply reinforce the requirements and explains what is needed for compliance.</p> <p>2. The SDT has changed the data retention requirements in TOP-001-2 to the same timeframe (current calendar year plus previous calendar year) for all requirements for consistency purposes.</p> <p>TOP-001-2, data retention: The Balancing Authority, Transmission Operator, Distribution Provider, Load-Serving Entity, and Generator Operator shall each keep data or evidence to show compliance as identified below for each applicable Requirement and Measure for the current calendar year and one previous calendar year unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.</p> <p>3. The SDT has changed the data retention requirements in TOP-001-2 to the same timeframe (current calendar year plus previous calendar year) for all requirements for consistency purposes.</p>		

Organization	Yes or No	Question 7 Comment
<p>4. The interpretation of the SDT on "all" requested and submitted subsequent audit records" means any supporting data required to be provided following a compliance audit. This would be a reasonable request, and that data should be kept with the original audit records.</p> <p>5. The SDT agrees that all data retention requirements in TOP-002-3 should be the same.</p> <p>TOP-002-3, data retention: The Transmission Operator shall keep data or evidence to show compliance for each Requirement and Measure for a rolling six month period unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.</p> <p>6. The SDT has already taken care of this and the change has been made. Thank You for the comment.</p> <p>7&8. The data retention periods for TOP-003-1 have been changed so that they are all the same - 3 calendar years (except for Requirement/Measure 1). The SDT feels a signature page would be acceptable and has changed the standard accordingly.</p> <p>TOP-004-3, M2: Each Transmission Operator shall make available evidence that it has Agreements with directly interconnected Transmission Operators that specify switching of synchronous BES tie lines in accordance with Requirement R2. Such evidence could include but is not limited to a dated document with confirmation of the Agreement, such as a signature page or a memorandum of understanding, in electronic or hard copy format.</p>		
ITC Transmission	No	<p>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.</p> <p>In TOP-002 M1 add operating plans or guides as evidence that an assessment was performed.</p> <p>In TOP-002 retention requirements should be the same for all requirements.</p>
<p>Response: The SDT will change the data retention requirements in TOP-001-2 for all 6 requirements to the same timeframe for consistency purposes (current calendar year plus previous calendar year).</p> <p>TOP-001-2, data retention: The Balancing Authority, Transmission Operator, Distribution Provider, Load-Serving Entity, and Generator Operator shall each keep data or evidence to show compliance as identified below for each applicable Requirement and Measure for the current calendar year and one previous calendar year unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:.</p> <p>The SDT feels that operating plans or guides are not required in TOP-002-3, M1. TOP-002-3, R1 simply states that the TOP needs to do an assessment for the next days operation to identify any potential SOL's . If there are no potential SOL's identified in the assessment then there is no need for plans or guides on how to address SOL's.</p>		
ISO-NE	No	<p>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</p>

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Organization	Yes or No	Question 7 Comment
		<p>cause is entities to pass requests around to get statements from others to have something to show an auditor.</p> <p>TOP-003 It should be acceptable (rather than 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.</p>
IRC Standards Review Committee	No	<p>In general, TOP-001 is an event triggered standard. For example, a limit is violated and not corrected, an entity failed to follow 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.</p> <p>TOP-003 It should be acceptable (rather than 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.</p>
<p>Response: The SDT believes that all the measures in TOP-001-2 are appropriate and should easily be able to be complied with for auditing purposes. If an entity is asked to follow a directive or help in some way during an emergency those directives and conversations should be documented and most likely recorded. Even if there were not an event on the System, the SDT feels that all directives and requests between entities should be required to be written down at a minimum and therefore should be easy to retain for proof at a later time if needed.</p> <p>The SDT believes that mandating all entities to forward all required data specification information to one site is beyond the scope of the SDT. The measures do in fact revolve around failure to obtain or provide data. The SDT will make no changes to TOP-003 based on these comments.</p>		
Manitoba Hydro	No	TOP-001-2. Data retention for all requirements should be the same. That is, current year plus the previous year.
<p>Response: The SDT will change the data retention requirements in TOP-001-2 for all 6 requirements to the same timeframe for consistency purposes (current calendar year plus previous calendar year).</p> <p>TOP-001-2, data retention: The Balancing Authority, Transmission Operator, Distribution Provider, Load-Serving Entity, and Generator Operator shall each keep data or evidence to show compliance as identified below for each applicable Requirement and Measure for the current calendar year and one previous calendar year unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.</p>		
Ameren	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 consistency as possible.
<p>Response: The SDT has reviewed the data retention requirements and made changes for consistency where necessary.</p>		
Energy Services	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?

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Organization	Yes or No	Question 7 Comment
<p>Response: The SDT understands that the term assessment may mean different things to different entities. TOP-002-3, R1 indicates that the TOP needs to assess whether normal or Contingency conditions for the next day may exceed an SOL. Generally speaking this will only be known to the TOP through load flow studies and security analysis. TOP-002-3, M1 states “Such evidence could include but is not limited to dated operator logs or reports”. As for the evidence, the SDT agrees that power flow outputs and study results are more appropriate and has made that change.</p> <p>TOP-002-3, M1. The Transmission Operator shall have evidence that it has assessed next day operations in accordance with Requirement R1. Such evidence could include but is not limited to dated power flow study results.</p>		
AEP	No	<p>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.</p> <p>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.</p>
<p>Response: The SDT will change the data retention requirements in TOP-001-2 for all 6 requirements to the same timeframe for consistency purposes (current calendar year plus previous calendar year).</p> <p>TOP-001-2, data retention: The Balancing Authority, Transmission Operator, Distribution Provider, Load-Serving Entity, and Generator Operator shall each keep data or evidence to show compliance as identified below for each applicable Requirement and Measure for the current calendar year and one previous calendar year unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.</p> <p>The data retention periods for TOP-003-1 have been changed so that they are all the same.</p>		
Northeast Utilities	Yes	
American Transmission Company	Yes	
Southern Company Transmission	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	

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Organization	Yes or No	Question 7 Comment
Montenay Power Corp.	Yes	
Consumers Energy Company	Yes	
Oncor Electric Delivery	Yes	
Duke Energy	Yes	
Response: Thank you for your comments.		

8. The SDT has included compliance elements including VSL for this posting. Do you agree with the assignments that have been made? If not, please provide specific suggestions for change.

Summary Consideration:

Due to industry comments, the SDT has changed the following requirements, measures, and VSLs:

TOP-001-2, R1: Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall comply with each reliability directive issued by the Transmission Operator, unless the respective entity informs the Transmission Operator that such actions would violate safety, equipment, regulatory or statutory requirements.

TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.

TOP-001-2, R4: Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to have a reliability impact on other reliability entities with those entities unless conditions do not permit such coordination.

VSL

TOP-001-2, R1:

R1	N/A	N/A	N/A	The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with a reliability directive issued by the Transmission Operator, and the respective entity did not inform the Transmission Operator that such action would violate safety, equipment, regulatory, or statutory requirements
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TOP-001-1, R3, Severe VSL: The Transmission Operator did not render emergency assistance to other Transmission Operators, as requested and available, and such actions would not violate safety, equipment, regulatory, or statutory requirements.

TOP-001-2, R4 VSL:

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R4	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with 25% or less of the affected reliability entities unless conditions did not permit such coordination	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with more than 25% or less than or equal to 50% of the affected reliability entities unless conditions did not permit such coordination	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with more than 50% or less than or equal to 75% of the affected reliability entities unless conditions did not permit such coordination.	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with more than 75% of the affected entities unless conditions did not permit such coordination.
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TOP-001-2, R6 VSL:

R6	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's T_v on one occasion.	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's T_v on two occasions.	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's T_v on three occasions.	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's T_v on four or more occasions.
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TOP-002-3, R3 VSL:

R3	The Transmission Operator did not notify 25% or less of the reliability entities identified in the plan(s) cited as to their role in the plan(s).	The Transmission Operator did not notify more than 25% and less than or equal to 50% of the reliability entities identified in the plan(s) as to their role in the plan(s).	The Transmission Operator did not notify more than 50% and less than or equal to 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).	The Transmission Operator did not notify more than 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).
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TOP-003-1, R2 VSL:

R2	The Transmission Operator did not distribute its data specification to 25% or less of the entities that has Facilities monitored by the Transmission Operator or to 25% or less of the entities that provide Facility status to the Transmission Operator.	The Transmission Operator did not distribute its data specification to more than 25% and less than or equal to 50% of the entities that have Facilities monitored by the Transmission Operator or to more than 25% and less than or equal to 50% of the entities that provide Facility status to the Transmission Operator.	The Transmission Operator did not distribute its data specification to more than 50% and less than or equal to 75% of the entities that have Facilities monitored by the Transmission Operator or more than 50% and less than or equal to 75% of the entities that provide Facility status to the Transmission Operator.	The Transmission Operator did not distribute its data specification to more than 75% of the entities that have Facilities monitored by the Transmission Operator or more than 75% of the entities that provide Facility status to the Transmission Operator.
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TOP-003-1, R3 VSL:

R3	The Balancing Authority did not distribute its data specification to 25% or less of the entities that provide Facility status to the Balancing Authority.	The Balancing Authority did not distribute its data specification to more than 25% and less than or equal to 50% of the entities that provide Facility status to the Balancing Authority.	The Balancing Authority did not distribute its data specification to more than 50% and less than or equal to 75% of the entities that provide Facility status to the Balancing Authority.	The Balancing Authority did not distribute its data specification to more than 75% of the entities that provide Facility status to the Balancing Authority.
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Organization	Yes or No	Question 8 Comment
Santee Cooper	No	OK with the VSLs with the exception of our concerns discussed in Question 12.
Response: Thank you for your response and please see the response to question 12.		
SERC OC Standards Review Group	No	TOP-001, R4. We suggesting changing the words "affect and affected" to "impact and impacted", respectively.

Organization	Yes or No	Question 8 Comment		
<p>Response: The SDT has changed the requirement.</p> <p>TOP-001-2, R4: Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to have a reliability impact on other reliability entities with those entities unless conditions do not permit such coordination.</p>				
<p>Dominion - Electric Market Policy</p>	<p>No</p>	<p>TOP-001-2R1 - 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.</p> <p>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.</p> <p>R4 - Revise to conform to comment in question 12.</p> <p>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</p>		
<p>Response: On TOP-001-2, R1, the SDT agrees with your suggestion and has made conforming changes to clarify that noncompliance is based on a single occurrence where directions were not obeyed except in those cases where the TOP was not informed of safety, equipment, regulatory, or statutory requirements that prevented compliance with the directives. We also removed the Lower, Moderate and High VSLs at the suggestion of ITC Transmission.</p> <p>TOP-001-2, R1 VSL:</p>				
<p>R1</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with a reliability directive</p>

Organization	Yes or No	Question 8 Comment
		<p>issued by the Transmission Operator, and the respective entity did not inform the Transmission Operator that such action would violate safety, equipment, regulatory, or statutory requirements.</p>
<p>:</p> <p>On TOP-001-2, R3, the SDT agrees and has made conforming changes for the same reasoning as indicated in our response for TOP-001-1, R1, above.</p> <p>TOP-001-1, R3, Severe VSL: The Transmission Operator did not render emergency assistance to other Transmission Operators, as requested and available, and such actions would not violate safety, equipment, regulatory, or statutory requirements.</p> <p>On TOP-001-2, R4: The SDT will ask a specific question of the industry on deleting the GOP from this requirement in the next posting.</p> <p>On TOP-003-1, R4, the SDT thanks you for your comment, but does not agree. The intent of this requirement is to guarantee that the TOP will have all the data necessary to perform Real-time monitoring and reliability assessments. As such, the data that is requested is either supplied or it isn't, creating a binary situation. Attempting to divine 4 levels of non-compliance in a binary situation results in imprecise boundaries and increased auditor discretion, both of which lead to regulatory uncertainty, which is what the SDT is attempting to minimize.</p>		
Bonneville Power Administration	Yes	I think TOP-001-2 R6 would be better to say the TOP "shall act to ensure mitigation of the magnitude?" thus eliminating extraneous phrasing "direct others".
<p>Response: The phrase "ensure mitigation" potentially introduces new obligations on the TOP via the compliance process, e.g., how would we measure that the TOP "ensured mitigation" when the term "ensure" means to essentially guarantee in all situations? Therefore, the SDT did not change the language of Requirement R6.</p>		
FirstEnergy	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,

Organization	Yes or No	Question 8 Comment
		<p>or statutory requirements on (one, two, three, four or more) occasion. "</p> <p>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.</p> <p>The VSL for TOP-001 R4 should be revised in a similar fashion to R1 and R3 above.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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. "</p> <p>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.</p>
<p>Response: On TOP-001-2, R1 and R3 VSL, the SDT made changes to accommodate industry concerns.</p> <p>TOP-001-2, R1 VSL:</p>		

Organization	Yes or No	Question 8 Comment			
R1	N/A	N/A	N/A	N/A	The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with a reliability directive issued by the Transmission Operator, and the respective entity did not inform the Transmission Operator that such action would violate safety, equipment, regulatory, or statutory requirements
<p>TOP-001-1, R3, Severe VSL: The Transmission Operator did not render emergency assistance to other Transmission Operators, as requested and available, and such actions would not violate safety, equipment, regulatory, or statutory requirements.</p> <p>On TOP-001-2, R4, the SDT cannot determine your intent as to why the VSL for R4 should be revised, because the comment indicates that it should be revised “in a similar fashion to R1 and R3”, yet, R4 does not have the clarifying clause that was the subject of the comments in R1 and R3. Therefore, no change was made with regard to binary VSL but wording changes for clarity have been made.</p> <p>TOP-001-2, R4 VSL:</p>					
R4	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not

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Organization	Yes or No	Question 8 Comment			
	coordinate their respective operations known or expected to impact other reliability entities with 25% or less of the affected reliability entities unless conditions did not permit such coordination	coordinate their respective operations known or expected to impact other reliability entities with more than 25% or less than or equal to 50% of the affected reliability entities unless conditions did not permit such coordination	coordinate their respective operations known or expected to impact other reliability entities with more than 50% or less than or equal to 75% of the affected reliability entities unless conditions did not permit such coordination.	coordinate their respective operations known or expected to impact other reliability entities with more than 75% of the affected entities unless conditions did not permit such coordination.	
On TOP-002-3, R3 the SDT agrees and has made appropriate changes.					
TOP-002-3, R3 VSL:					
R3	The Transmission Operator did not notify 25% or less of the reliability entities identified in the plan(s) cited as to their role in the plan(s).	The Transmission Operator did not notify more than 25% and less than or equal to 50% of the reliability entities identified in the plan(s) as to their role in the plan(s).	The Transmission Operator did not notify more than 50% and less than or equal to 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).	The Transmission Operator did not notify more than 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).	
On TOP-003-1, R2 and R3, the SDT agrees.					
TOP-003-1, R2 VSL:					
R2	The Transmission Operator did not distribute its data specification to 25%	The Transmission Operator did not distribute its data specification to more	The Transmission Operator did not distribute its data specification to more	The Transmission Operator did not distribute its data specification to more	

Organization	Yes or No	Question 8 Comment			
	or less of the entities that have Facilities monitored by the Transmission Operator or to 25% or less of the entities that provide Facility status to the Transmission Operator.	than 25% and less than or equal to 50% of the entities that have Facilities monitored by the Transmission Operator or to more than 25% and less than or equal to 50% of the entities that provide Facility status to the Transmission Operator.	than 50% and less than or equal to 75% of the entities that have Facilities monitored by the Transmission Operator or more than 50% and less than or equal to 75% of the entities that provide Facility status to the Transmission Operator.	than 75% of the entities that have Facilities monitored by the Transmission Operator or more than 75% of the entities that provide Facility status to the Transmission Operator.	
TOP-003-1, R3 VSL:					
R3	The Balancing Authority did not distribute its data specification to 25% or less of the entities that provide Facility status to the Balancing Authority.	The Balancing Authority did not distribute its data specification to more than 25% and less than or equal to 50% of the entities that provide Facility status to the Balancing Authority.	The Balancing Authority did not distribute its data specification to more than 50% and less than or equal to 75% of the entities that provide Facility status to the Balancing Authority.	The Balancing Authority did not distribute its data specification to more than 75% of the entities that provide Facility status to the Balancing Authority.	
<p>On TOP-004-3, R1, the SDT feels the suggested wording is basically equivalent to what is already there so no change was made.</p> <p>On TOP-004-3, R2, the SDT is going to ask a question on the elimination of this requirement in the next posting so no changes have been made at this time.</p>					

Organization	Yes or No	Question 8 Comment		
MRO NERC Standards Review Subcommittee	No	<p>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 "? the respective entity did not inform the transmission operator ?".</p> <p>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?</p> <p>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?</p> <p>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".</p>		
<p>Response: On TOP-001-1, R1, the SDT has made this change. TOP-001-1, R1 VSL:</p>				
R1	N/A	N/A	N/A	<p>The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with a reliability directive issued by the Transmission Operator, and the respective entity did not inform the Transmission Operator that such action would violate</p>

Organization	Yes or No	Question 8 Comment			
					safety, equipment, regulatory, or statutory requirements
<p>On TOP-001-2, R2, the SDT removed the phrase from the requirement which should alleviate the concern.</p> <p>TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.</p> <p>On TOP-001-2, R4, the SDT believes that the respective entity makes the determination but that they must be prepared to defend their actions on a case by case basis.</p> <p>On TOP-001-2, R6, the RTOSDT agrees with your comment and has made conforming changes.</p> <p>TOP-001-2, R6 VSL:</p>					
R6	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on one occasion.	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on two occasions.	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on three occasions.	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on four or more occasions.	
ITC Transmission	No	<p>TOP-001 R1 Failure to follow a directive one even one occasion without reason should be treated as a severe VSL, similar to R3.</p> <p>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.</p> <p>TOP-004 R4 should have VSL for all levels, similar to R2,R3</p>			
<p>Response: On TOP-001-2, R1, the SDT has made changes accordingly.</p>					

Organization	Yes or No	Question 8 Comment		
TOP-001-2, R1 VSL:				
R1	N/A	N/A	N/A	<p>The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with a reliability directive issued by the Transmission Operator, and the respective entity did not inform the Transmission Operator that such action would violate safety, equipment, regulatory, or statutory requirements</p>
<p>On TOP-002-3, R1 and R2, the SDT agrees and has changed TOP-001-2, R1 VSL. In response to your final comment, there is no TOP-004-3, R4,</p>				
ISO-NE	No	<p>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.</p>		

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Organization	Yes or No	Question 8 Comment			
IRC Standards Review Committee	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.			
Response: The SDT thanks you for your response.					
Manitoba Hydro	No	TOP-001-2 R5.. SOLs should be removed from the requirement and the VSLs.			
Response: The SDT believes that the current wording is appropriate and no change was made.					
Ameren	No	<p>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?</p> <p>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".</p>			
<p>Response: On TOP-001-2, R4, the SDT believes that the respective entity makes the determination but that they must be prepared to defend their actions on a case by case basis.</p> <p>On TOP-001-2, R6, the RTOSDT agrees with your comment and has made conforming changes.</p> <p>TOP-001-2, R6 VSL:</p>					
R6	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on one	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on two	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on three	The Transmission Operator did not make available evidence of its actions or when it directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL's Tv on four or	

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Organization	Yes or No	Question 8 Comment			
	occasion.	occasions.	occasions.	more occasions.	
Independent Electricity System Operator	No	<p>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.</p> <p>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</p> <p>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.</p>			
<p>Response:</p> <p>Understood.</p> <p>The language of the requirement will determine if violations can be accumulated. If the requirement is plural, violations can be accumulated to assess the VSL. Without specific examples, the SDT cannot make specific changes.</p> <p>On TOP-003-1, R1, the RTO SDT agrees with your suggestion and has made conforming changes.</p> <p>TOP-003-1, R1: The SDT disagrees and has not made a change.</p>					
Duke Energy	No	<p>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.</p> <p>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"?</p>			
<p>Response: The SDT continues to view Requirement R5 as a binary requirement, and did not change the VSLs per your suggestion.</p> <p>On TOP-002-3, R3, the SDT has made changes to address your concern.</p> <p>TOP-002-3, R3 VSL:</p>					
R3	The Transmission Operator did not notify 25% or less of the reliability	The Transmission Operator did not notify more than 25% and less than or	The Transmission Operator did not notify more than 50% and less than or	The Transmission Operator did not notify more than 75% of the	

Organization	Yes or No	Question 8 Comment			
	<p>entities identified in the plan(s) cited as to their role in the plan(s).</p>	<p>equal to 50% of the reliability entities identified in the plan(s) as to their role in the plan(s).</p>	<p>equal to 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).</p>	<p>reliability entities identified in the plan(s) as to their role in the plan(s).</p>	
<p>American Transmission Company</p>	<p>No</p>	<p>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.</p> <p>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.</p> <p>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.</p>			
<p>Response: On TOP-001-2, R1, that SDT agrees and has made conforming changes to the VSLs. The language of the requirement will determine if violations can be accumulated. If the requirement is plural, violations can be accumulated to assess the VSL</p> <p>TOP-001-2, R1: Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall comply with each reliability directive issued by the Transmission Operator, unless the respective entity informs the Transmission Operator that such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>TOP-001-2, R1 VSL:</p>					
<p>R1</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>		<p>The Balancing Authority, Distribution Provider, Load-Serving Entity, or Generator Operator did not comply with a reliability directive issued by the</p>

Organization	Yes or No	Question 8 Comment			
					Transmission Operator, and the respective entity did not inform the Transmission Operator that such action would violate safety, equipment, regulatory, or statutory requirements
<p>On TOP-001-2, R2, however, the SDT disagrees that this is a binary requirement and did not change the VSLs.</p> <p>On the VSLs for TOP-001-2, R5 and R6, the SDT understands your concerns, but without evidence of action, how can one prove compliance? The SDT sees no conflict between the VSLs as worded currently and the requirements.</p> <p>On the VSL for TOP-002-3, R3, the SDT has made a change to address your concerns.</p> <p>TOP-002-3, R3 VSL:</p>					
R3	The Transmission Operator did not notify 25% or less of the reliability entities identified in the plan(s) cited as to their role in the plan(s).	The Transmission Operator did not notify more than 25% and less than or equal to 50% of the reliability entities identified in the plan(s) as to their role in the plan(s).	The Transmission Operator did not notify more than 50% and less than or equal to 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).	The Transmission Operator did not notify more than 75% of the reliability entities identified in the plan(s) as to their role in the plan(s).	
NPCC	Yes				
Northeast Utilities	Yes				

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Organization	Yes or No	Question 8 Comment
PJM Interconnection	Yes	
Consumers Energy Company	Yes	
Oncor Electric Delivery	Yes	
Response: Thank you for your response.		

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9. The SDT has provided an Implementation Plan with this posting. Do you agree with the implementation timeframes? If not, please provide specific suggestions for improvement.

Summary Consideration: The SDT feels that the Implementation Plan is well supported by the industry due to the fact there was only a single negative comment received. Therefore, the SDT will follow the timeframe for the Implementation Plan as drafted.

Organization	Yes or No	Question 9 Comment
SERC OC Standards Review Group	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.
<p>Response: The RTO SDT feels the longer implementation dates are necessary in order to ensure that the projects mentioned in the prerequisites: Pre-2006, Operate within Interconnection Reliability Operating Limits; 2006-06, Reliability Coordination; and Project 2006-07, ATC/TTC/AFC and CBM/TRM Revisions have been approved prior to the implementation of this Project 2007-03, Real-Time Operations.</p>		
Dominion - Electric Market Policy	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.
<p>Response: The SDT appreciates your concern but this is outside the scope of the SDT.</p>		
NPCC	Yes	
Santee Cooper	Yes	
PJM Interconnection	Yes	
Southern Company Transmission	Yes	
Bonneville Power Administration	Yes	

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Organization	Yes or No	Question 9 Comment
FirstEnergy	Yes	
MRO NERC Standards Review Subcommittee	Yes	
ITC Transmission	Yes	
IRC Standards Review Committee	Yes	
Montenay Power Corp.	Yes	
PECO Energy		
Manitoba Hydro	Yes	
Consumers Energy Company	Yes	
Ameren	Yes	
Oncor Electric Delivery	Yes	
Entergy System Planning & Operations (Gen & Mktg)	Yes	
Entergy Services	Yes	
Independent Electricity System Operator	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.
Duke Energy	Yes	

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Organization	Yes or No	Question 9 Comment
AEP	Yes	
Northeast Utilities	Yes	
American Transmission Company	Yes	
ISO-NE	Yes	
Response: Thank you for your response.		

10. The SDT is recommending retirement of TOP-005-1, TOP-006-1, TOP-007-0, TOP-008-0, and PER-001-0. Do you agree with these retirements? If not, please provide specific reasons for your position.

Summary Consideration:

Due to industry comments, the following were changed:

TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.

TOP-003-1, Purpose: To ensure that the Transmission Operator and Balancing Authority have the data needed to fulfill their functional responsibilities.

TOP-003-1, R1: Each Transmission Operator and Balancing Authority shall have a documented specification for data required to fulfill their respective responsibilities per the NERC Functional Model. The specification shall include:

TOP-003-1, R4: 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(s) and Balancing Authority(ies).

TOP-003-1, M4: Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, and Transmission Owner shall make available evidence that it has provided data, as specified in Requirement R1, to its Transmission Operator(s) and Balancing Authority(ies) in accordance with Requirement R4. The data is limited to that needed by the Transmission Operator to support Operational Planning Analyses and reliability assessments. Such evidence could include but is not limited to dated operator logs, voice recordings, or e-mail records.

Organization	Yes or No	Question 10 Comment
NPCC	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.
Independent Electricity System Operator	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.
<p>Response: TOP-006-1: There was a problem with the original posted material. You are correct; this is now covered under the data specification requirements of TOP-003-1.</p>		

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Organization	Yes or No	Question 10 Comment
SERC OC Standards Review Group	Yes	<p>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?</p> <p>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?</p> <p>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.</p>
<p>Response: TOP-006-1: There was a problem with the original posted material. You are correct; this is now covered under the data specification requirements of TOP-003-1.</p> <p>TOP-008-0: There was a problem with the original posted material. As re-posted in the Implementation Plan, this should read: Deleted – now covered by TOP-001-2, R6 for IROL. Taking immediate steps for relief of all SOLs experienced or contributed to may not always be prudent, especially if other organizations are addressing the cause. In such cases, uncoordinated immediate actions may be counterproductive. Accordingly, requiring immediate action to relieve all SOLs was deleted in consideration of TOP-001-1 and TOP-004-3 requirements applied in combination.</p> <p>PER-001-0: Thank you for your response.</p>		
Dominion - Electric Market Policy	No	<p>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.</p>
<p>Response: The re-drafting effort is trying to delineate the RC vs. TOP/BA standards as was pointed out in the SAR for this project.</p>		
Southern Company Transmission	No	<p>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</p>

Organization	Yes or No	Question 10 Comment
		<p>reliability.</p> <p>TOP-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.?</p> <p>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".</p> <p>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."</p> <p>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 SOL's and IROL's under TOP-004-1, R1 without any planning.</p> <p>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.</p> <p>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.?</p> <p>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-</p>

Organization	Yes or No	Question 10 Comment
		<p>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.</p> <p>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 status 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?</p> <p>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).</p> <p>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".</p> <p>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.</p>
<p>Response: TOP-001-1, R1 & PER-001-0, R1: Standards are written to a functional entity, not to individuals. How an organization meets the standard is entirely up to them.</p> <p>TOP-001-1, R2: In the opinion of the SDT, TOP-004-3, R1 covers this issue.</p> <p>TOP-001-2, R2: The SDT agrees and the phrase has been deleted.</p> <p>TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.</p> <p>TOP-001-2, R3: The SDT believes that there may be an issue here and will provide a specific question in the next posting to see what the industry thinks.</p> <p>TOP-002-2, R1, R5 & R15: The SDT believes that in order for a BA to comply with CPS and DCS that they must plan and therefore a separate requirement is not required and would actually represent double jeopardy. The BAL standards cover these issues.</p>		

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Organization	Yes or No	Question 10 Comment
<p>TOP-002-2, R8: The SDT believes that your comment contains the answer to the question in that BAL covers ACE and ramping is part of ACE.</p> <p>TOP-003-1, R2 & R3: The SDT feels that the suggested wording is really equivalent and therefore no change was made.</p> <p>TOP-006-1, R5, R6, & R7: Performance to other requirements adequately covers the need to monitor and therefore no separate specific monitoring requirement is needed.</p> <p>TOP-004-3, R2: The SDT is asking a question in the second posting regarding the possible deletion of this requirement.</p> <p>TOP-003-1, R4: Due to your comments, the SDT has changed TOP-003-1 as shown below.</p> <p>TOP-003-1, Purpose: To ensure that the Transmission Operator and Balancing Authority have the data needed to fulfill their functional responsibilities.</p> <p>TOP-003-1, R1: Each Transmission Operator and Balancing Authority shall have a documented specification for data required to fulfill their respective responsibilities per the NERC Functional Model. The specification shall include:</p> <p>TOP-003-1, R4: 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(s) and Balancing Authority(ies).</p> <p>TOP-003-1, M4: Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, and Transmission Owner shall make available evidence that it has provided data, as specified in Requirement R1, to its Transmission Operator(s) and Balancing Authority(ies) in accordance with Requirement R4. The data is limited to that needed by the Transmission Operator to support Operational Planning Analyses and reliability assessments. Such evidence could include but is not limited to dated operator logs, voice recordings, or e-mail records.</p>		
FirstEnergy	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.
<p>Response: Please see the response to question 12.</p>		
Duke Energy	Yes	<p>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?</p> <p>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?</p>
<p>Response: TOP-005-1: The way that the standards have been re-written, data from the ISN is no longer being requested.</p> <p>TOP-006-1: There was a problem with the original posted material. You are correct; this is now covered under the data specification requirements of TOP-003-1.</p>		
MRO NERC Standards	Yes	

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Organization	Yes or No	Question 10 Comment
Review Subcommittee		
ITC Transmission	Yes	
IRC Standards Review Committee	Yes	
Montenay Power Corp.	Yes	
Manitoba Hydro	Yes	
Consumers Energy Company	Yes	
Ameren	Yes	
Oncor Electric Delivery	Yes	
AEP	Yes	
Northeast Utilities	Yes	
American Transmission Company	Yes	
Santee Cooper	Yes	
Entergy Services	Yes	
PJM Interconnection	Yes	
Bonneville Power Administration	Yes	
ISO-NE	Yes	

Organization	Yes or No	Question 10 Comment
Response: Thank you for your response.		

11. If you are aware of any regional variances or any conflicts between the proposed standards and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement that would be required as a result of these standards, please identify them here.

Summary Consideration:

No respondents cited any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement that would impact the revised standards.

Organization	Yes or No	Question 11 Comment
Dominion - Electric Market Policy	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.
Response: The requirement is not for the GO, GOP, PSE, or LSE to perform a reliability assessment. The requirement is the aforementioned entities to supply operational data such as unit output, derates, total load, known interchange schedules, etc., in an agreed upon format and periodicity to the TOP who will perform the reliability assessment.		
MRO NERC Standards Review Subcommittee	Yes	
Response: Without a specific reference, the SDT is unable to respond to your comment.		
Bonneville Power Administration	Yes	WECC TOP-STD-007-0 would now need to link to TOP-004-3 (R1).
Response: That is an administrative matter for WECC and beyond the scope of the SDT.		
NPCC	No	
Santee Cooper	No	

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Organization	Yes or No	Question 11 Comment
PJM Interconnection	No	
FirstEnergy		Not aware of any.
ITC Transmission	No	
IRC Standards Review Committee	No	
Manitoba Hydro	No	
Consumers Energy Company	No	
Ameren	No	
Oncor Electric Delivery	No	
Entergy Services	No	
Independent Electricity System Operator	No	
Duke Energy	No	
Northeast Utilities	No	
American Transmission Company	No	
ISO-NE	No	
Response: Thank you for your response.		

12. Are there any other issues that need to be addressed? Please be specific.

Summary Consideration:

In response to industry comments, the following were changed:

TOP-001-2, Purpose: To ensure coordination between and among reliability entities for the reliability of the Bulk Electric System (BES).

TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.

TOP-001-2, R3: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory or statutory requirements.

TOP-001-2, R4: Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to have a reliability impact on other reliability entities with those entities unless conditions do not permit such coordination.

TOP-001-2, M4: The Transmission Operator and Generator Operator shall each make available upon request, evidence that operations were coordinated among impacted reliability entities in accordance with Requirement R4 unless conditions do not permit such coordination. Such evidence could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence.

TOP-001-2, Data Retention for R5: The Transmission Operator shall make available evidence for the current calendar year and one previous year that it has informed its Reliability Coordinator of actions being taken to return the System to within limits when an IROL or SOL has been exceeded in accordance with Requirement R5 and Measurement M5.

TOP-001-2, Data Retention for R6: The Transmission Operator shall make available evidence for the current calendar year and one previous calendar year of when it acted, or directed others to act, to mitigate the magnitude and duration of exceeding an IROL within the IROL’s Tv in accordance with Requirement R6 and Measurement M6.

TOP-001-2, R4 VSL	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with 25% or less of the affected reliability entities unless conditions did not permit such coordination.	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with more than 25% or less than or equal to 50% of the affected reliability entities unless conditions	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with more than 50% or less than or equal to 75% of the affected reliability entities unless conditions	The Transmission Operator or Generator Operator did not coordinate their respective operations known or expected to impact other reliability entities with more than 75% of the affected entities unless conditions did not permit such coordination.
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		did not permit such coordination.	did not permit such coordination.	
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TOP-003-1, R4: 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(s) and Balancing Authority(ies).

Organization	Yes or No	Question 12 Comment
Santee Cooper	Yes	<p>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)</p> <p>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?</p> <p>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?</p>
<p>Response: TOP-001-2, R2: The SDT has changed the requirement to provide additional clarity as to intent. .</p> <p>TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.</p> <p>TOP-004-3, R2: Agreement is a defined term in the NERC Glossary.</p> <p>The SDT will post a question in the next iteration on this topic.</p>		
SERC OC Standards Review Group	Yes	We suggest eliminating R2 of TOP-004-3. An interconnection agreement between two entities will include this requirement.
<p>Response: The SDT will ask a question on this topic in the next posting. .</p>		
Dominion - Electric Market Policy	Yes	<p>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</p>

Organization	Yes or No	Question 12 Comment
		<p>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).</p> <p>Specific commentsTOP-001-2 R3 - concern about ambiguity of phrase "to others", particularity 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.</p> <p>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.</p> <p>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."</p> <p>TOP-003R1.2 - 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'?</p> <p>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</p>

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Organization	Yes or No	Question 12 Comment
		required to submit data for the same facility to multiple reliability entities.
		<p>Response: Generic –The re-drafting effort is trying to delineate the RC vs. TOP/BA standards as was pointed out in the SAR for this project.</p> <p>TOP-001-2, R3 - The SDT has reviewed this requirement and made changes to provide clarity. BA's have been removed to avoid duplication with EOP-001-0, Requirement R1 and the GOP is essentially under the control of the BA and therefore isn't needed here.</p> <p>TOP-001-2, R3: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>TOP-001-2, R4 – The SDT believes that the industry needs to weigh in on this topic and will ask a specific question in the next posting.</p> <p>TOP-002-3, R3 – The SDT disagrees and believes that it is important for the TOP to study its own system which may not be the same as what the RC studies as the objectives are different. No change made.</p> <p>TOP-003-1, R1.2 –The SDT believes the term “mutually agreeable” gives leeway for the reliability entities to exchange the required data and doesn't preclude any protocols.</p> <p>TOP-003-1, R4 – The SDT agrees with the inclusion of the BA and has changed Requirement R4 accordingly. The plurals are correct as multiple reporting requirements do exist and need to be accommodated in a national standard. If there is a single reporting requirement, then this wording remains intact and should not cause a problem.</p> <p>TOP-003-1, R4: 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(s) and Balancing Authority(ies).</p>
Southern Company Transmission	Yes	<p>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".</p> <p>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.?</p> <p>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?</p> <p>In TOP-003-1, in the Purpose statement replace "system" with "System".</p> <p>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" .</p>

Organization	Yes or No	Question 12 Comment
		<p>In TOP-001-2, In section 1.4 of Data Retention the term "reliability entities" is capitalized. Should it be in lower case?</p> <p>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?</p>
<p>Response: 1 – The SDT thanks you for your comment and will replace ‘functional entity’ with ‘reliability entity’.</p> <p>TOP-001-2, Purpose: To ensure coordination between and among reliability entities for the reliability of the Bulk Electric System (BES).</p> <p>2 – The SDT believes the as written requirement is correct as it includes SOL or IROL limits, as appropriate, with the current wording.</p> <p>3 – Your reference is incorrect, the standard cited has been updated and the correct reference is IRO-005-3, Requirement R10. Having said that, you are correct in your premise and TOP-001-2, Requirement R7 has been deleted.</p> <p>4 – “System” is a defined term, but in the context of the Purpose statement “Transmission System” is not a defined term and therefore should not be capitalized.</p> <p>5 – The SDT believes specification is the correct word. “Catalog” as suggested or “list, file, register, etc.” is limiting in nature. Using the word “specification” augments the sub-requirements. The SDT finds providing and exchanging in this context to be basically equivalent and no change was made.</p> <p>6 – The SDT thanks you for your comment. ‘Reliability entities’ is not a defined term and therefore should be lower case.</p> <p>TOP-006-1: This is now covered under the data specification requirements of TOP-003-1.</p> <p>TOP-008-1: As re-posted in the Implementation Plan, this should read: “Deleted – now covered by TOP-001-2, R6 for IROL. Taking immediate steps for relief of all SOLs experienced or contributed to may not always be prudent, especially if other organizations are addressing the cause. In such cases, uncoordinated immediate actions may be counterproductive. Accordingly, requiring immediate action to relieve all SOLs was deleted in consideration of TOP-001-1 and TOP-004-3 requirements applied in combination.”</p>		
Bonneville Power Administration	Yes	<p>Good Ideas - thanks. However, do not see anything analogous to the current TOP-001 R1. and think we should retain something of this nature.</p>
<p>Response: The SDT thanks you for your comment but believes Requirement R1 of TOP-001-1 is not measurable. Furthermore, as identified in the Implementation Plan, the SDT does not feel that this requirement is needed in a Reliability Standard. Other standards already require the necessary actions. If this statement was intended to protect the operator from liability, it doesn’t provide any real protection.</p>		
FirstEnergy	Yes	<p>1. 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</p>

Organization	Yes or No	Question 12 Comment
		<p>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.</p> <p>2. 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. "</p> <p>3. 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.</p> <p>4. In TOP-001-2 R5, the Drafting Team is supporting action in advance of communication, we support this stance.</p> <p>5. 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</p>

Organization	Yes or No	Question 12 Comment
		<p>System.</p> <p>6. 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.</p> <p>7. 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.</p> <p>8. 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.</p> <p>9. 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?</p> <p>10. 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.</p> <p>11. 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?</p> <p>12. 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.</p> <p>13. 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.</p> <p>14. 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</p>

Organization	Yes or No	Question 12 Comment
		<p>standard.</p> <p>15. 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."</p> <p>16. 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.</p> <p>17. 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.</p> <p>18. 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.</p>

Response: 1 – The SDT has modified TOP-001-2, Requirement R2 for clarity.

TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.

2 – The SDT is going to ask a specific question in the next posting on this issue.

3 – The SDT believes the requirement as written addresses when coordination is required with the statement of “operations known or expected to affect other reliability entities”. The SDT also believes it would be nearly impossible to list every scenario concerning conditions. Furthermore, the SDT believes statements such as “at the earliest possible time” and “as soon as possible” are not measurable. No change made.

4 – Thanks for your comment.

5 – The SDT believes this is covered in EOP-001-0, Requirement R3.3.

6 – The SDT believes DCS and CPS criterion is only applicable to the BA function. Furthermore, the SDT does not fully understand the premise of your question and

Organization	Yes or No	Question 12 Comment
<p>does not see the parallel between your concern and TOP-002-2, Requirement R1.</p> <p>7 – Thanks for your comment.</p> <p>8 – This is addressed in TOP-003-1, R4.</p> <p>9 – This is addressed in TOP-003-1, R5.</p> <p>10 – This is addressed in TOP-003-1, R5.</p> <p>11 – The SDT believes that this is already covered by VAR-001.</p> <p>12 – This is being addressed by Project 2007-02: Operations Communications protocols. .</p> <p>13 – This is addressed in TOP-003-1, R4.</p> <p>14 – This is addressed in the proposed Implementation Plan. Note that in some Canadian jurisdictions, a standard becomes enforceable once the BOT approves a standard, subject to any delays identified in the associated Implementation Plan.</p> <p>15 – The SDT may be deleting this requirement. A specific question will be raised in the next posting on this topic.</p> <p>16 – The SDT believes that the current wording provides the flexibility needed to fulfill this task. No change made.</p> <p>17 – The SDT doesn't believe that a specification falls within the definition of High VRF. The SDT believes that PSE data would be commercial data and not reliability data and has not made this change.</p> <p>18 – TOP-006-1, R5, R6, & R7: Performance to other requirements adequately covers the need to monitor and therefore no separate specific monitoring requirement is needed.</p>		
MRO NERC Standards Review Subcommittee	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?
<p>Response: The SDT believes having a reason to miss the reporting process also means you violated Requirement R1 of the standard and a penalty would be assessed.</p>		
ITC Transmission	Yes	<ol style="list-style-type: none"> 1. 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? 2. TOP-001 R3 It would be helpful to have a definition of 'emergency', recognizing this is a broader issue than just this standard. 3. 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.

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		<p>4. 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.</p> <p>5. 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.</p>
<p>Response: 1 – The SDT has removed this phrase.</p> <p>TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.</p> <p>2 –The SDT will use the word “emergency” as it is consistent with EOP standards.</p> <p>3 – The SDT believes reading the requirements as a whole provides the clarity you are seeking.</p> <p>4 – The SDT will evaluate this idea after the industry responds to the question on elimination of Requirement R2.</p> <p>5 – The SDT will ask a specific question about eliminating this requirement in the next posting.</p>		
ISO-NE	Yes	<p>We appreciate this as a first effort in reducing the redundancy in the V0 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.</p> <p>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.</p>
IRC Standards Review Committee	Yes	<p>We appreciate this as a first effort in reducing the redundancy in the V0 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.</p> <p>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.</p>
<p>Response: While you are technically correct on the use of the terminology, actual review of the requirements doesn't indicate any need to change any of the wording used in the proposed revisions.</p>		

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Organization	Yes or No	Question 12 Comment
<p>The SDT agrees that record keeping for non-violations is unnecessary.</p>		
<p>Indiana Municipal Power Agency</p>	<p>Yes</p>	<p>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.</p>
<p>Response: The SDT believes the standard as drafted covers who needs to provide required data, in what format, and the timeframe and periodicity.</p>		
<p>Ameren</p>	<p>Yes</p>	<p>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?</p>
<p>Response: This statement is dictated by the Compliance Guidelines. Because there is no impact to reliability if the report is not filed, the action of filing the report does not meet the criteria for an enforceable reliability requirement. Note that in accordance with the Sanctions Guidelines, if an entity fails to file the report as identified, then the Compliance Enforcement Authority may determine that the failure to report justifies a larger penalty than would otherwise be assessed.</p>		
<p>Entergy System Planning & Operations (Gen & Mktg)</p>	<p>Yes</p>	<p>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.</p> <p>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 operate in an unknown operating state (TOP-004 R3) and promptly return to an analyzed conditions/or perform an analysis for the current condition.</p>
<p>Response: The referenced standards and projects are all readily available on the NERC web site. To have included them in the Implementation Plan would have created an extremely large and unmanageable document.</p> <p>The SDT did look at alternative measures in each case and where requirements were deleted, decided that there was no suitable alternative.</p>		
<p>Entergy Services</p>	<p>Yes</p>	<p>1. Please expound upon the reasons why the SDT determined that TOP-002-2 R19 and TOP-004-2 R4 are unmeasurable.</p> <p>2. TOP-001-2 R4 is going to be very difficult to measure. Any guidance the SDT can provide on how to demonstrate</p>

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Organization	Yes or No	Question 12 Comment			
		<p>compliance would be appreciated.</p> <p>3. 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."</p>			
<p>Response: 1 –TOP-002-2, R19 is unmeasurable because ‘accurate’ is not a measurable term. TOP-004-2, R4 is unmeasurable because ‘valid’ is a vague term.</p> <p>2 – The SDT believes the criteria are identified in the Measures. Beyond that, the SDT can’t provide compliance guidance.</p> <p>3 – The SDT believes the requirements as drafted provide an appropriate level of reliability and places the responsibility on the TOP where it belongs. No change made.</p>					
Duke Energy	Yes	<p>1. 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".</p> <p>2. 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.</p> <p>3. 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.</p> <p>4. TOP-002-2 Requirement R11 contains a requirement for a seasonal assessments to determine SOLs. Where is this requirement in the revised standards?</p>			
<p>Response: 1 – The SDT has incorporated your suggested language.</p> <p>TOP-001-2, R4: Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to have a reliability impact on other reliability entities with those entities unless conditions do not permit such coordination.</p> <p>TOP-001-2, M4: The Transmission Operator and Generator Operator shall each make available upon request, evidence that operations were coordinated among impacted reliability entities in accordance with Requirement R4 unless conditions do not permit such coordination. Such evidence could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence.</p>					
TOP-001-2, R4 VSL	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not	The Transmission Operator or Generator Operator did not	

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	coordinate their respective operations known or expected to impact other reliability entities with 25% or less of the affected reliability entities unless conditions did not permit such coordination.	coordinate their respective operations known or expected to impact other reliability entities with more than 25% or less than or equal to 50% of the affected reliability entities unless conditions did not permit such coordination.	coordinate their respective operations known or expected to impact other reliability entities with more than 50% or less than or equal to 75% of the affected reliability entities unless conditions did not permit such coordination.	coordinate their respective operations known or expected to impact other reliability entities with more than 75% of the affected entities unless conditions did not permit such coordination.	
<p>2 – The SDT will ask a specific question in the next posting about deleting this requirement.</p> <p>3 – The SDT made this correction in the revised Implementation Plan that was posted during the first comment period.</p> <p>4 – The SDT believes reliability has been improved by requiring an assessment for next day operations and that this is as far out as a requirement needs to cover. You can always do more that the requirements. Longer term studies are done in planning and complement these assessments.</p>					
AEP	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.			
<p>Response: The SDT will ask a question in the next posting about deleting this requirement.</p>					
American Transmission Company	Yes	<p>1. 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.</p> <p>2. 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"</p>			

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		<p>otherwise it should be done following the action.</p> <p>3. TOP-001-2 Requirement 4:What is the minimum level of "affect" that requires communication?</p> <p>4. 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?</p>
<p>Response: 1 – The SDT studied your suggestion but feels that the requirement is clear as written and that your suggestion could result in a reduction in the reliability of the system. To the degree that an entity anticipates an Emergency, that information should be shared and this is what the requirement says.</p> <p>2 – The SDT has changed the requirement to address your concern.</p> <p>TOP-001-2, R2: Each Transmission Operator shall inform its Reliability Coordinator and affected Transmission Operators of actual and anticipated Emergency conditions.</p> <p>3 – The SDT will replace the word “affect” with “have a reliability impact upon”.</p> <p>TOP-001-2, R4: Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to have a reliability impact on other reliability entities with those entities unless conditions do not permit such coordination.</p> <p>4 – There is only one assessment required but an assessment may require multiple studies. It is up to the entity to determine how many studies they must perform in order to assess of their next day operations</p>		
NPCC	No	
PJM Interconnection	No	
Montenay Power Corp.	No	
Manitoba Hydro	No	
Consumers Energy Company	No	
Oncor Electric Delivery	No	
Independent Electricity System Operator	No	

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Northeast Utilities	No	
Response: Thank you for your response.		