

Meeting Notes

Project 2015-04 - Alignment of Terms

Drafting Team Meeting

Thursday, May 7, 2015 | 8:00 AM – 5:00 PM, EST
Friday, May 8, 2015 | 8:00 AM – 3:30 PM, EST

NERC Washington DC Office
1325 G Street NW, Suite 600
Washington, DC 20005

Dial In: 1-866-740-1260 | Access Code: 5216143 | Security Code: 050415
WebEx: www.readytalk.com | Access Code 5216143

Meeting Attendees:

Name	Company	Member/ Observer	In-person (IP) Web (W)	
			5/7	5/8
Jerry Rust	Northwest Power Pool	Chair	IP	IP
Chris Scanlon	Exelon	Vice-chair	IP	IP
Mark Cole	Georgia System Operation Corporation	Member	IP	IP
Jill Loewer	Utility Services, Inc.	Member	W	W
Diana McMahon	Salt River Project	Member	IP	IP
Shannon Mickens	Southwest Power Pool, Inc.	Member	IP	IP
Heather Moreno	Luminant Energy	Member	IP	IP
Patrick O'Connor	ReliabilityFirst	Member	W	W
Wayne Van Liere	LG&E and KU	Member	N/A	N/A
Shane Crowe	Entergy	Member	W	N/A
Andrew Pusztai	American Transmission Company	Observer	IP	IP
Christina Koncz	PSEG	Observer	IP	IP
Andres Lopez	Federal Energy Regulatory Commission	FERC staff	IP	N/A
Kenneth Hubona	Federal Energy Regulatory Commission	FERC staff	W	IP
Lacey Ourso	NERC – Standards	NERC	IP	IP

Name	Company	Member/ Observer	In-person (IP) Web (W)	
			5/7	5/8
Lauren Perotti	NERC – Legal	NERC	IP	IP
Laura Anderson	NERC – Standards	NERC	W	N/A
Sean Bodkin	NERC – Standards	NERC	IP	IP
Caroline Clause	NERC – External Affairs	NERC	W	N/A

Agenda Items:

Agenda Item 1 - NERC Antitrust Guidelines and Public Meeting Announcement

At the start of the meeting on both days, the NERC Antitrust Compliance Guidelines were presented to the team.

Agenda Item 2 - Discuss meeting objective(s)

The objectives for the meeting were outlined as follows:

1. For each cross-over term, review research and information gathered by sub-teams, and revise Glossary and/or ROP definitions as appropriate
2. Develop justification document for proposed revisions

Agenda Items 3-5

SDT discussion regarding background research obtained by sub-team, including examination of the history of the term’s definition, previous drafting teams’ intent, relevant NERC filings to FERC, and any FERC orders approving the term’s definition. Additionally, the SDT examined how each term is used in the Glossary, Reliability Standards, and ROP provisions. Based on this thorough examination, the SDT determined whether revisions to the Glossary definition, ROP definition, or both definitions were appropriate. In some instances, the SDT concluded that alignment revisions were not appropriate due to differing application of the terms in the Glossary and/or ROP. Also, for a number of terms, the SDT identified areas where the definition language could be improved, given industry usage. For such terms, the SDT will develop a Standards Authorization Request (SAR) outlining the identified issues, and the team’s proposal for how to address each issue.

Agenda Item 3 - Group 1 cross-over terms: Individual drafting team member presentations regarding completed templates; drafting team discussion regarding recommendations; drafting team determination regarding revision approach for each cross-over term.

- Term 1: Adjacent Balancing Authority – Jerry, Wayne, Mark
- Term 6: Bulk Power System – Mark, Chris
- Term 17: Generator Operator – Diana, Wayne
- Term 18: Generator Owner – Diana, Wayne

- Term 29: Net Energy for Load or NEL – Jerry, Shannon
- Term 40: Reliability Standard – Andy, Patrick
- Term 44: Sink Balancing Authority – Jerry, Wayne, Mark
- Term 45: Source Balancing Authority – Jerry, Wayne, Mark
- Term 48: System Operating Limit – Shannon, Shane, Laura

Agenda Item 4 - Group 3 cross-over terms: Jerry Rust overview regarding proposed approach; drafting team discussion regarding recommendations; drafting team determination regarding revision approach for each cross-over term.

Agenda Item 5 - Group 4 cross-over terms: Patrick O’Connor overview regarding proposed approach; drafting team discussion regarding recommendations; drafting team determination regarding revision approach for each cross-over term.

Of the fifty-five cross-over terms, forty contain inconsistencies or differences in the definition narratives. To achieve consistency and alignment of these cross-over terms, the SDT will propose revisions to twenty-six Glossary terms and sixteen ROP terms.

Throughout the discussion regarding proposed revisions to cross-over terms in Groups 1-4, the SDT continued to develop a list of recommendations based upon issues identified during the meeting. The following issues and/or recommendations were discussed:

1. Develop a process to ensure revisions or changes to existing cross-over terms incorporate changes to either Glossary / ROP.
 - a. Under the current revision process, the Glossary was revised to correct an errata error; however, the corresponding changes were not made to the ROP definition (despite the fact the definition is marked with a double asterisk ** to indicate that it was adopted from the Glossary). See, Term 34: Protection System – omitted the word “station” from both the Glossary and ROP definition; when the error was discovered, the Glossary was fixed but not the ROP.
2. Recommend a process for development of new or revised defined terms. The process should include an assessment of the impact for all existing occurrences of term throughout Reliability Standards and ROP.
 - a. For example, when BES definition was developed, it included the defined term “Transmission.” However, that term is not defined in the ROP but was still included in the definition narrative. See also, Term 16 – Flowgate.
3. SDT to recommend future effort undertaken to examine all occurrences of defined terms contained in both ROP/Glossary to determine whether should/not be capitalized, including:
 - a. Term is capitalized but should not be because:
 - i. It is not a defined term in any source

1. For example, in the Glossary definition for Reserve Sharing Group Reporting ACE, “Planning Authority Area” is capitalized but this is not a defined term. (Same with Transmission Planner)
 - ii. It is not defined in that particular source
 - iii. The term is defined in that particular source, but it is not intended to have the meaning of the defined term

- b. Term is not capitalized but it should be: Term in the ROP or Glossary is a defined term within that particular source, and it is used in the lowercase instead of capitalized (to indicate use of the defined term). For each of these, SDT to assess whether the term is intended to have the meaning of the defined term.
 - i. See, for example, Term 16 – Flowgate: in part (2) of definition narrative, “transmission” is not capitalized but should be.
 - ii. Also, if 2015-04 revisions are approved, and Transmission is added as a new defined term to the ROP, then will need to assess every occurrence of the term to determine whether it is intended to have the defined meaning (and thus, should be capitalized). List of ROP lowercase
 - Balancing Authority Area (lowercase)
 - Bulk Electric System (both capitalized and lowercase)
 - Bulk Power System (lowercase)
 - Critical Energy Infrastructure Information (lowercase)
 - Distribution Factor (lowercase)
 - Distribution Provider (lowercase)
 - Element (lowercase)
 - Flowgate (lowercase)
 - ISO/RTO (lowercase)
 - Open Access Transmission Tariff (lowercase)
 - Planning Authority (lowercase)
 - Point of Delivery (lowercase)
 - Point of Receipt (lowercase)
 - Reactive Power (lowercase)
 - Reliability Coordinator (lowercase)
 - Reliability Coordinator Area (lowercase)
 - Reliability Standard (lowercase)
 - System (lowercase)
 - Transmission Operator (lowercase)
 - Transmission Owner (lowercase)
 - Transmission Planner (lowercase)
 - Transmission Service Provider (lowercase)

4. SDT to submit a SAR to revise existing definitions that are deficient, incorrect, inadequate, or need clarification, including:
 - a. Load
 - b. Net Energy for Load - Consider submitting a SAR to propose revising the definition to cover both the ROP and Glossary uses.
 - c. Transmission Customer – As currently written, it is unclear how the definition is intended to be applied. Is it Part (1) and (2) vs. Part (1) or (2)?
 - d. Balancing Authority – see: load-interchange-generation. Need to clarify the meaning of this term.
 - e. Interconnection – consider submitting a SAR related to improving the first sentence of this definition to provide greater technical clarity
 - f. Facility – See explanation in SDT recommendations re Generator Owner and Generator Operator
 - g. All CIP-related defined terms from Version 5 revisions, including four cross-over terms:
 - i. Critical Asset
 - ii. Critical Cyber Asset
 - iii. Cyber Asset
 - iv. Cyber Security Incident

As part of review/recommendation, SDT should review **all** of the defined terms to specifically identify those that are believed to be deficient or in need of revision.

5. SDT to consider recommendation to add explanation in preface of both the Glossary and ROP that plural form of defined term intended to have same definitional meaning as is defined in the singular.
6. (Andy) Should “agreement” be capitalized? It is defined term in the Glossary, but not the ROP. SDT discussion regarding approach for sentence structure when there are two consecutive defined terms. Want to avoid confusion that the group is a defined term (see Term 49: Transmission Customer: Service for Transmission vs. Transmission Service). For example, change Transmission Service Agreement to Agreement for Transmission Services (instead of using 2 defined terms together). See also, Transmission Service Provider.
7. Standardize structure – Use of bullets, numbering, etc.
 - a. Also use of “quotation marks” to set off words that are not defined; or are being used as a phrase/intended to have a collective meaning. For example, see Term 50 Transmission Operator, which includes the use of quotes around “local”
8. Note: For Reliability Standard – did not revise individual ROP sections or appendices that repeat definition. This should be included as part of phase 2 revisions, including:

- a. Appendix 3A
 - b. Appendix 4E
9. For Generator Owner and Generator Operator – removed proposed revisions to adjust definition in Appendix 5B. All necessary adjustments to definition should be made as part of phase 2.

The team scheduled additional conference calls to finalize the documents, and discussed a tentative date for the next in-person meeting. The goal is to request SC authorization for an initial posting at the June 10 meeting. The deadline for submitting documents to NERC staff is May 27.

- May 19, 9:00am-11:00am, EST – Conference call
- May 21, 10:00am -11:00am, EST – Conference call
- May 26, 9:00am-11:00am, EST – Conference call
- August 25-27 – In-person meeting (TENTATIVE)

Implementation Plan – the team discussed the implementation plan for the Glossary terms. It was decided that the effective date should be the first day of the first calendar quarter after FERC/governmental approval, but no earlier than July 1, 2016 (to reflect the effective date of Interconnection).

The team discussed upcoming outreach opportunities. Also, the team to host a webinar approximately one month after the posting date. Tentatively July 9 or July 16.