Unofficial Comment Form
Project 2016-01 Modifications to TOP and IRO Standards

Do not use this form for submitting comments. Use the electronic form to submit comments on IRO-002-5 – Reliability Coordination - Monitoring and Analysis and TOP-001-4 – Transmission Operations. The electronic form must be submitted by 8 p.m. Eastern, Wednesday, August 3, 2016.

Additional information about this project is available on the Project 2016-01 Modifications to TOP and IRO Standards project page. If you have questions, contact Senior Standards Developer, Mark Olson (via email), or at (404) 446-9760.

Background Information
On November 19, 2015, the Federal Energy Regulatory Commission (FERC) issued Order No. 817 approving revised TOP and IRO standards and directing modifications to address the following reliability concerns:

- Transmission Operator (TOP) monitoring of non-Bulk Electric System (BES) facilities as necessary for reliability (P. 35);
- Redundancy and diverse routing of data exchange capabilities used by Reliability Coordinators (RC), Balancing Authorities (BA), and TOPs (P. 47); and
- Testing of alternate data exchange capabilities used in RC, TOP, and BA control centers (P. 51).

FERC established a deadline of July 2017 for NERC to file modifications to standards addressing the above directives.

Proposed IRO-002-5 and TOP-001-4 contain revised and new requirements addressing the Order No. 817 directives. The Standards Drafting Team (SDT) provided justification for each requirement in the accompanying rationale boxes. Additionally, the SDT replaced the defined term Special Protection System (SPS) in the approved standards with the approved defined term Remedial Action Scheme (RAS). The SDT did not make any other changes to the requirements in the approved standards.
Questions

1. The SDT has developed TOP-001-4 Requirement R10 to address directives for TOP monitoring of non-BES facilities necessary for reliability. Do you agree with the proposed requirement? If you do not agree, or if you agree but have comments or suggestions for the proposed requirement provide your recommendation and explanation.

☑ Yes
☐ No

Comments:

2. The SDT has developed IRO-002-5 Requirement R2 and TOP-001-4 Requirements R20 and R23 to address directives for redundancy and diverse routing of RC, TOP, and BA data exchange capabilities. Do you agree with the proposed requirements? If you do not agree, or if you agree but have comments or suggestions for the proposed requirements provide your recommendation and explanation.

☐ Yes
☑ No

Comments:
Replace the word diverse routing with another word like “separated” or phrase like “redundancy designed to avoid a single point of failure”.

3. The SDT has developed IRO-002-5 Requirement R3 and TOP-001-4 Requirements R21 and R24 to address directives for testing redundancy of data exchange capabilities used in RC, TOP, and BA control centers. Do you agree with the proposed requirements? If you do not agree, or if you agree but have comments or suggestions for the proposed requirements provide your recommendation and explanation.

☐ Yes
☑ No

Comments:
R21 should be revised to be a quarterly test rather than a monthly test. We propose a complete test (EMS failover from the primary to backup) to be conducted quarterly instead of an incomplete test of different components once a month. A thorough test conducted quarterly is more effective to ensure reliability.

Also in the ‘Rationale for Requirement R21’ box add a statement like ‘for example either planned or unplanned failovers’ immediately after: ‘When an actual event successfully exercises the
redundant functionality, it can be considered a test for the purposes of the proposed requirement.’

4. Do you agree with the Implementation Plan for the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the Implementation Plan provide your recommendation and explanation.

☐ Yes
☐ No

Comments:
5. Do you agree with the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for the requirements in the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the VRFs and VSLs provide your recommendation and explanation.

☐ Yes
☐ No

Comments:

6. Provide any additional comments for the SDT to consider, if desired.

Comments: