Unofficial Comment Form

Project 2018-03 Standards Efficiency Review Retirements

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on Project 2018-03 Standards Efficiency Review Retirements. Comments must be submitted by 8 p.m. Eastern, Friday, April 12, 2019.

Additional information is available on the project page. If you have questions, contact Standards Developer, Laura Anderson (via email), or at 404-446-9671.

Background Information

In 2017, NERC initiated the Standards Efficiency Review (SER). The scope of this project was to use a risk-based approach to identify potential efficiencies through retirement of Reliability Standard Requirements. Following the completion of the first phase of work, the SER Team submitted a Standard Authorization Request (SAR) to the NERC Standards Committee, which the Standards Committee accepted in August 2018.

Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR. This project proposes to:

- Retire several Reliability Standards on the grounds that the requirements contained therein are duplicative to other requirements, administrative in nature, or are otherwise unnecessary for reliability;
- Revise several currently-effective Reliability Standards to remove duplicative, administrative, or otherwise unnecessary requirements (thereby retiring those requirements); and
- Withdraw a Reliability Standard, MOD-001-2, which is currently pending approval by applicable governmental authorities.

Based on the expertise of the Standard Drafting Team (SDT) and from consideration of the comments received in the SAR posting, the SDT considered the recommendations for retirements listed in the SAR and determined that it would not proceed with several of the recommended retirements for the following reasons:

1. The SDT has determined that additional work is necessary to ensure the retirement of certain standard requirements does not create a reliability gap. The SDT recommends that these standards requirements be considered as part of the SER Phase II effort. These requirements include:
   - BAL-005-1, Requirements R4 and R6
   - COM-002-4, Requirement R2
2. The SDT is proposing to take no action on two standards already scheduled for retirement.
   - PRC-015-1, Requirements R1, R2 and R3
   - PRC-018-1, Requirements, R1, R2, R3, R4, R5 and R6

3. The SDT determined the following requirements are inappropriate for retirement because they serve a reliability benefit:
   - IRO-002-5, Requirements R4 and R6
     - Requirements R4 and R6 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES. The inclusion of the Energy Management System (EMS), IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1.
   - IRO-008-2, Requirement R6
     - Although Requirement R6 appears to be administrative in nature, there are reliability benefits to knowing what actions were taken to prevent or mitigate the exceedance.
   - TOP-001-4, Requirements R16 and R17
     - Requirements R16 and R17 are necessary to make it clear that the System Operator has the authority to postpone, cancel or recall planned outages of EMS, IT or communications-related equipment. Although some Reliability Coordinators may include this type of equipment in their outage coordination process (IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1.

The SDT created a justification document that is posted as a supporting document on the project page.
Questions

1. The SDT has determined that additional work is necessary to ensure the retirement of certain standard requirements does not create a reliability gap. The SDT recommends that these standards requirements be considered as part of the SER Phase II effort. These requirements include: BAL-005-1, Requirements R4 and R6; COM-002-4, Requirement R2; EOP-005-3, Requirement R8; EOP-006-3, Requirement R7; IRO-014-3, Requirement R3; IRO-017-1, Requirement R3; and VAR-001-5, Requirement R3. Do you agree with the SDT’s recommendation that these standards requirements be considered as part of the SER Phase II effort? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation.

☑ Yes
☐ No

Comments:

2. The SDT is proposing to take no action on two standards already scheduled for retirement: PRC-015-1, Requirements R1, R2 and R3; and PRC-018-1, Requirements, R1, R2, R3, R4, R5 and R6. Do you agree with the SDT’s recommendation to take no action for these standards already scheduled for retirement? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation.

☑ Yes
☐ No

Comments:

3. The SDT determined the following requirements are inappropriate for retirement because they serve a reliability benefit: IRO-002-5, Requirements R4 and R6; IRO-008-2, Requirement R6, and TOP-001-4, Requirements R16 and R17. Do you agree with the SDT’s recommendation to retain these requirements? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation.

☑ Yes
☐ No

Comments:
4. The SDT is proposing to retire FAC-008-3, Requirements R7 and R8. Do you agree with the SDT’s proposal to retire these requirements? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes
☒ No

Comments:
We recommend a separate standards development project be initiated to holistically address issues identified during the periodic review of FAC-008-3 and the potential retirement of FAC-008-3 requirements identified during the Standards Efficiency Review. On March 18, 2010, Docket No. RR09-6-000, FERC issued an order directing NERC to propose modification of electric reliability organization rules of procedure. This order included FERC’s concerns regarding facility ratings and limiting elements. (Please see paragraph 13 and 14 of the FERC order.) We believe that additional consideration is needed regarding the Facility Ratings requirements and the relationship to the data requirements of MOD-032, IRO-010, and TOP-003 to ensure that most limiting elements are determined. The equipment data that is required to be provided per the other reliability standards may not be sufficient to determine Facility Ratings, including for use in Real Time Models.

5. The SDT is proposing to retire FAC-013-2, Requirements R1, R2, R4, R5 and R6 (all). Do you agree with the SDT’s proposal to retire FAC-013-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☒ Yes
☐ No

Comments:

6. The SDT is proposing to retire INT-004-3.1, Requirements R1, R2, and R3 (all). Do you agree with the SDT’s proposal to retire INT-004-3.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☒ Yes
☐ No

Comments:

7. The SDT is proposing to retire INT-006-4, Requirements R3.1, R4, and R5. Do you agree with the SDT’s proposal to retire Requirements R3.1, R4, and R5 of INT-006-4? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.
8. The SDT is proposing to retire INT-009-2.1, Requirement R2. Do you agree with the SDT’s proposal to retire Requirement R2 of INT-009-2.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes
☐ No

Comments:

9. The SDT is proposing to retire INT-010-2.1, Requirements R1, R2, and R3 (all). Do you agree with the SDT’s proposal to retire INT-010-2.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes
☒ No

Comments:
NPCC agrees that the specific content of INT-010, creating RFI or Reliability Adjusted Arranged Interchange after-the-fact, does not impact reliability. However, if INT-010 is to be retired, then INT-009 R1 must also be modified and that revision is not addressed in the Implementation Plan. INT-009-3 proposed as part of this effort continues to reference INT-010, Therefore, NPCC recommends that either INT-009 R1 be modified to simply remove the cross reference to INT-010 or that the retirement of INT-010 and corresponding changes required INT-009 R1 be moved to Phase 2 of this effort.

10. The SDT is proposing to retire IRO-002-5, Requirement R1. Do you agree with the SDT’s proposal to retire Requirement R1 of IRO-002-5? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☒ Yes
☐ No

Comments:

11. The SDT is proposing to retire MOD-004-1, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, and R12 (all). Do you agree with the SDT’s proposal to retire MOD-004-1? If you do not agree,
12. The SDT is proposing to retire MOD-008-1, Requirements R1, R2, R3, R4, and R5 (all). Do you agree with the SDT’s proposal to retire MOD-008-1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes
☐ No

Comments:

13. The SDT is proposing to retire MOD-028-2, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, and R11 (all). Do you agree with the SDT’s proposal to retire MOD-028-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes
☐ No

Comments:

14. The SDT is proposing to retire MOD-029-2a, Requirements R1, R2, R3, R4, R5, R6, R7, and R8 (all). Do you agree with the SDT’s proposal to retire MOD-029-2a? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes
☐ No

Comments:

15. The SDT is proposing to retire MOD-030-3, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9 and R10 (all). Do you agree with the SDT’s proposal to retire MOD-030-3? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.
16. The SDT is proposing to retire MOD-001-1a, Requirements R1, R2, R3, R4, R5, R6, R7, R8 and R9 (all). Do you agree with the SDT’s proposal to retire MOD-001-1a? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes  
☐ No

Comments:

17. The SDT is proposing to withdraw Reliability Standard, MOD-001-2, which is currently pending approval by applicable governmental authorities. Do you agree with the SDT’s proposal to withdraw Reliability Standard MOD-001-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes  
☐ No

Comments:

18. The SDT is proposing to retire MOD-020-0, Requirement R1 (all). Do you agree with the SDT’s proposal to retire MOD-020-0? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes  
☐ No

Comments:

19. The SDT is proposing to retire PRC-004-5(i), Requirement R4. Do you agree with the SDT’s proposal to retire Requirement R4 of PRC-004-5(i)? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☐ Yes  
☒ No

Comments:
The retirement of PRC-004-5(i) could potentially burden the entity with an open item, with no closing date, hoping that a new technological break-through will finally determine the cause of misoperation. We believe entities will simply declare that no cause for the misoperation was identified and be done with it.

If R4 is retired, one or both of the following approaches will likely be taken by entities:

- Delaying formal declaration of a misoperation for all disturbances until the root cause is identified or until 120 days expires.
- Declaring the cause for a greater percentage of misoperations as “unknown” and not performing the detailed testing to find the true root cause for an issue that is intermittent.

This is not beneficial to the goal of reliability improvements and reduced misoperations.

We recommend that the SDT consider how the ability to declare that “no cause of a misoperation was identified” be retained within the standard to document the end of an investigation. We are concerned that the removal of the ability to declare that no cause of a misoperation was identified may result in audit and compliance concerns.

20. The SDT is proposing to retire TOP-001-4, Requirements R19 and R22. Do you agree with the SDT’s proposal to retire Requirements R19 and R22 of TOP-001-4? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☑ Yes
☐ No

Comments:
NPCC supports the SDTs position. However, we would consider supporting a position in which these Requirements would be recommended to the phase two analysis, and that they should be incorporated into the entity certification process.

21. The SDT is proposing to retire VAR-001-5, Requirement R2. Do you agree with the SDT’s proposal to retire Requirement R2 of VAR-001-5? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

☑ Yes
☐ No

Comments:

22. Please provide any additional comments for the SDT to consider that have not already been provided in the questions above.

Comments: