Unofficial Comment Form
2018 Periodic Review Standing Review Team – Standards Grading

Do not use this form for submitting comments. Use the electronic form to comment on 2018 Periodic Review Standing Review Team – Standards Grading. Comments must be submitted by 8 p.m. Eastern, Thursday, June 28, 2018.

Additional information is available on the project page. If you have questions, contact Scott Barfield-McGinnis (via email), or at (404) 446-9689.

Background
NERC standards development has moved towards a more deliberate and measured pace after several years of activity to address outstanding Federal Energy Regulatory Commission directives, Paragraph 81 recommendations, Independent Expert Review Panel (IERP) recommendations, and emerging reliability risks. The primary focus of standards development activity has shifted to Periodic Reviews (PRs) to determine whether individual standards are necessary, clear, and efficient in addressing identified reliability risks. The 2018 Standards Grading material and questions posted for comment is an important part of this process to continuously improve the body of NERC standards and prioritize standards projects for 2019.

On March 9, 2016, the Standards Committee (SC) endorsed using an enhanced version of the IERP grading tool as the metric to grade all NERC Reliability Standards.²

Reliability Standards are eligible for grading if all requirements of that standard have been in effect for at least a year. In some instances, a standard may be eligible if:

- it has been a year since the effective date of the governmental order approving that standard if entities are “early adopting” the requirements as they implement their programs to prepare for the effective date; or
- if the standard is a revision to a standard that has been in effect greater than a year.

¹ Paragraph 81 Technical White Paper.
https://www.nerc.com/pa/Stand/Project%20201302%20Paraph%2081%20RF/P81_Phase_I_technical_white_paper_FINAL.pdf

² The North American Electric Reliability Corporation (NERC) retained five industry experts to independently review the NERC Reliability Standards, setting the foundation for a plan that will result in a set of clear, concise, and sustainable body of Reliability Standards. The primary scope was an assessment of the content and quality of the Reliability Standards, including identification of potential bulk power system (BPS) risks that were not adequately mitigated.

The five industry experts established an assessment process to develop recommendations for each requirement. The initial assessment determined whether a requirement should be retired. The remaining requirements were given a content and quality grade. A reliability risk level was assigned and the Team recommended prioritization of future work based on their risk and grades.
http://www.nerc.com/pa/Stand/Resources/Pages/default.aspx
Standards grading uses the same decisions-tree and Standards Grading Tool (“tool”) of the IERP. The Standing Review Team (SRT) reviewed each of the standard requirements associated with this year’s grading project for content, quality, and one question on cost effectiveness.

The SRT is comprised of the chair (or their delegate) of the SC, Operating Committee (OC), and Planning Committee (PC), along with a Regional representative and NERC staff. The SRT members are not tasked to propose solutions to any requirements. Rather, the SRT uses the tool to assign numeric grades to prioritize periodic reviews and instruct the future Periodic Review drafting teams. While the final standards grades are important data points for the PRs to consider, they are intended as one of many inputs to facilitate discussions and aid analyses during the reviews.

The SRT has completed the initial grading of eligible Reliability Standards, which is being posted for stakeholder comment. Following the closing of this stakeholder comment period, the SRT will consider inputs and host additional discussion at the second public meeting of the SRT scheduled for July 19, 2018. The outcome of the second public meeting will result in final grades of each standard requirement. Final grade results will be appended to the 2019-2021 Reliability Standards Development Plan.

The posted PR data tool represents input from each SRT member as a starting point for ultimately reaching consensus on grades. Where scoring variances exceeded three points among SRT members, discussion will be held to achieve consensus grades. The SRT members seek comments here in part to assist them in reaching consensus on requirements whose consensus grades have not yet been achieved.

Commenters: Note that this request for comments does not seek actual standards grades from commenters, but rather answers to the questions posed below to provide input to the SRT in reaching consensus on its final grading.

The final grades will be an input to determining future PRs. If a PR team recommends revising standard requirements that were graded in 2018, the SRT will re-grade those standard requirements based on the recommended revisions. The re-graded requirements will also be posted for additional stakeholder comment prior to final SRT grading.

The initial SRT grades are contained in the tool (MS Excel spreadsheet file) found here. The tool includes each SRT member’s initial grades on the content and quality for each standard requirement. The first four tabs of the SRT preliminary tool include the individual grading from each SRT member (OC, PC, Regions, and NERC). The “2018 Summary Grades” tab provides an aggregation of the content and quality grade, score average, and score deltas. The “2018 Summary Comments” tab provides a compilation of the member’s scores and comments by standard and requirement in the first few columns.
Questions
The tool provides a summary of the scoring for each standard and requirement. The SRT would like industry feedback on each of the questions below. Note that the tool has “Content” (C1-C3) questions and “Quality” (Q1-Q13) questions. If providing comment, indicate the question (e.g., C2, Q5, etc.) that best matches your concern.

1. For **CIP-014-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   - [x] Yes
   - [ ] No
   Comments:

2. For **COM-002-4**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   - [x] Yes
   - [ ] No
   Comments:

3. For **FAC-003-4**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   - [ ] Yes
   - [ ] No
   Comments:

4. For **FAC-013-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   - [x] Yes
   - [ ] No
   Comments:

5. For **IRO-006-5**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   - [x] Yes
   - [ ] No
   Comments:
6. For MOD-020-0, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   ○ Yes
   □ No
   Comments:

7. For MOD-025-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   ○ Yes
   □ No
   Comments:

8. For MOD-026-1, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   ○ Yes
   □ No
   Comments:

9. For MOD-027-1, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
   ○ Yes
   □ No
   Comments:

10. For MOD-028-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
    ○ Yes
    □ No
    Comments:

11. Two Periodic Reviews are planned for 2019 from the following eligible standards and standards families: CIP-014-2, COM-002-4, FAC-003-4, FAC-013-2, IRO-006-5, MOD-020-0, MOD-025-2, MOD-026-1, MOD-027-1, and MOD-028-2. Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2019? Please explain your response.
    Comments:
    Highest priority for review should be MOD-026-1 and MOD-027.1. We believe that the MOD-026-1 and MOD-027-1 standards have a gap in that they have left out elements like SVCs and
STATCOMs. These devices provide essentially reliability services. They are installed to increase transfer limits. The fact that they are omitted results in a reliability gap.

MOD-026-1 only requires tests completed, and relies on the GO or TO to exercise their own judgement/determination on the degree of adequacy and completeness of these tests. For example the Generator, Exciter, PSS, and VC models must be confirmed: "Documentation demonstrating the applicable unit’s model response matches the recorded response for a voltage excursion from either a staged test or a measured system disturbance". One cannot truly provide an accurate model without more than one test. That is to say, one can match the response to a voltage excursion with many parameters being incorrect. The wording in the standard only requires some voltage excursion.

We also find that the wording in both standards is 'loose' on the accuracy of the models, in that it does not provide sufficient specificity/criteria for judging accuracy. This may lead to circular arguments between the GO and TOP. For example, a GO who does not use the models may have a different view of what is accurate as compared to the planners using the models. Therefore they may submit a model and the TP may state it is not accurate enough, and the GO may argue that it is good (with a lot of back and forth and no resolution).

Inaccurate/invalid models of governors have a negative effect on the entire interconnections' ability to study events.

12. Please provide any additional comments here, on improving the standards grading process, the SRT’s approach to standards grading, or any other input you believe would be helpful in instructing the SRT’s final grading.

Comments: