Do not use this form for submitting comments. Use the electronic form to submit comments on Enhanced Periodic Review Standing Review Team – Standards Grading. The electronic form must be submitted by 8 p.m. Eastern, Monday, August 1, 2016.

Additional information is available on the project page. If you have questions, contact Mat Bunch (via email), or at (404) 446-9785.

Background Information
NERC standards development is moving towards a more measured, deliberate pace to development after several years of activity to address outstanding Federal Energy Regulatory Commission directives, Paragraph 81 recommendations, Independent Expert Review Panel (IERP) recommendations, and reliability risks. As the NERC standards move closer to steady state, the focus of standards development has shifted to enhanced periodic reviews as the primary means to determine whether individual standards continue to be necessary, clear, and efficient in addressing reliability risks. The material you are commenting on here is an important part of this process, which is intended to continuously improve the body of NERC standards. Additional information on this process can be found on the presentation from the Standards Grading Webinar held on June 7, 2016.

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.

All requirements of a Reliability Standard must have been in effect, based on the implementation/compliance dates approved by the applicable governmental authority, 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 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.

Standards grading uses the same decisions-tree and grading tools of the Independent Experts, with the addition of one quality question on cost-effectiveness. The cost-effectiveness is not reflected in the score of the currently-posted Standing Review Team (SRT) Preliminary Grades.

The chairs of the SC, Operating Committee (OC), Planning Committee (PC), a Regional representative, and NERC staff comprise the Enhanced Periodic Review Standing Review Team (EPRSRT). EPRSRT members are not tasked to propose solutions to any requirements. Rather, the EPRSRT is tasked with using the grading tool to assign numeric grades to instruct future Enhanced Periodic Reviews. While the SRT’s final
standards grades are important data points for the EPRs to consider, they are intended as one of many inputs to facilitate discussion during the reviews.

The EPRSRT has completed the initial grading of eligible Reliability Standards, which is being posted for stakeholder comment for 30 days. Stakeholder input and additional discussion at the second public meeting of the EPRSRT will result in final grades. Following the closing of this stakeholder comment period, the EPRSRT will consider inputs from stakeholders prior to finalizing grades. Final grades will be appended to the 2017-2019 Reliability Standards Development Plan.

Please note that the posted EPR data analysis matrix represents input from each EPRSRT member and represented a starting point for discussion on consensus grades. Where scoring variances exceeded three points among members, discussion occurred to achieve consensus. The EPRSRT members seek comments here in part to assist them in reaching consensus on requirements whose consensus grades have not yet been achieved.

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

The final grade will be an early input to future EPRs. If an EPR team recommends revising standard requirements that were graded in 2016, the SRT will re-grade those standard requirements based on the recommended revision. The re-graded requirements will also be posted for additional stakeholder comment prior to final SRT grading.

The initial EPRSRT grades are contained in a matrix posted as a .pdf document here. The matrix includes each EPRSRT member’s initial grades on the content and quality for each standard requirement. The EPRSRT used the data contained in the SRT Preliminary Grades workbook posted here in making its initial grades, which also can be accessed on the related files link on the project page. The first four tabs of the SRT Preliminary Grades workbook include the individual grading from each EPRSRT member (OC, PC, Regions, and NERC). The “Data Analysis” tab provides the normalization of the grades and is included (.pdf) as part of the grading material.
Questions

1. The EPRSRT has not yet finalized consensus content scores on EOP-011-1, Requirements R3, R4, R5, and R6. Please provide comments on what you believe the EPRSRT should consider in developing its final content scores on these requirements. In particular, the EPRSRT is interested in confirming from industry’s perspective whether the standard’s content is well-understood by those implementing it.

Comments:

2. The initial PRC-023-4 Content and Quality scoring from each EPRSRT member did not align due to a question on whether additional language is needed to clarify that the standard only applies to BES elements. Therefore, the EPRSRT seeks comments on whether there is a reliability concern not adequately captured by the existing language in PRC-023-4 that would warrant a low content score.

Comments:

3. The EPRSRT seeks comments on FAC-008-3, Requirements R7 and R8. Specifically, is the language of the requirements confusing or ambiguous as to cause a reliability concern not adequately captured by the existing language in FAC-008-3 that would warrant a lower quality and content score? Please explain your response.

☐ Yes
☒ No

Comments: FAC-008-3 Requirements R7 and R8 are not confusing or ambiguous, however, the use of “as scheduled” fill-in-the-blank language results in inherently inconsistent application of the standard. This can lead to administrative compliance issues such as where a Registered Entity has not provided an increased facility rating far enough in-advance of “As scheduled.” If the main concern of the FAC-008-3 standard is decreases to facility ratings, then the standard should be targeted to decreases to facility ratings, not system improvements that may result in increased facility ratings. It should be noted that FAC-008-3 is a commonly violated reliability standard.

4. At least two EPRs will begin in 2017 from the following standards and standards families eligible for EPRs: BAL-001, INT-004, INT-006, INT-009, INT-010, EOP-010, FAC-003, FAC-008, NUC-001, and the PRC family of standards. Based on the ongoing efforts of the EPRSRT, which standards and standards families should have the highest priority for EPR in 2017?

Comments: FAC-008 should be given priority for an ERP in 2017 since the standard contains “as scheduled” fill-in-the-blank language and is a commonly violated standard. EOP-010 should be given priority for an ERP in 2017 because it is the first standard in a new reliability risk topic for the
industry (GMD) and there may be early lessons learned in crafting the required GMD Operating Plans that will be useful for the industry and may influence revised standard requirements language. It is recommended that the EPR include a survey of the industry in order to find out how the utilities to which the standard is applicable (RC, TOPs) have developed their GMD Operating Plans.

5. Please provide any additional comments you believe would improve the standards grading process, the EPRSRT’s approach to standards grading, and any other input you believe would be helpful in instructing the EPRSRT’s final grading.

Comments: “Some have raised a technical concern regarding VAR-002-4. As written, there is concern that synchronous condensers and generations that may be capable of operating as synchronous condensers, may not be able to meet their voltage and reactive schedules because they basically operating as a load. The main requirement for synchronous condensers should be to have their Automatic Voltage Regulators in service. The ability to maintain voltage or reactive schedules is very limited. This should be reviewed from a technical perspective and we believe is a problem requiring clarification with VAR-002-4.”