Unofficial Comment Form
Periodic Review Standing Review Team – Standards Grading

Do not use this form for submitting comments. Use the electronic form to submit comments on Periodic Review Standing Review Team – Standards Grading. The electronic form must be submitted by 8 p.m. Eastern, Wednesday, August 2, 2017.

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

Background Information
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 2017 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 2018.

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.

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.

Standards grading uses the same decisions-tree and grading tools of the IERP. The Standing Review Team

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

2 The North American Electric Reliability Corporation (NERC) retained five industry experts (Team) 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 Team 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
(SRT) reviewed each of the standard requirements associated with this year’s grading project for content and quality, with the addition of one question on cost effectiveness.

The chairs of the SC, Operating Committee (OC), and Planning Committee (PC), along with a Regional representative and NERC staff, comprise the SRT. SRT members are not tasked to propose solutions to any requirements. Rather, the SRT uses the grading tool to assign numeric grades to prioritize periodic reviews and instruct the future Periodic Review drafting teams. While the SRT’s 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. Stakeholder input and additional discussion at the second public meeting of the SRT on August 22, 2017 will result in final grades. Following the closing of this stakeholder comment period, the SRT will consider inputs from stakeholders prior to finalizing grades. Final grades will be appended to the 2018-2020 Reliability Standards Development Plan.

Please note that the posted PR data analysis matrix represents input from each SRT member as a starting point for ultimately reaching consensus grades. Where scoring variances exceeded three points among SRT members, discussion occurred 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:** 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 SRT in reaching consensus on its final grading.

The final grade will be an early input to future PRs. If a PR team recommends revising standard requirements that were graded in 2017, 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 a matrix posted as a .pdf document [here](#). The matrix includes each SRT member’s initial grades on the content and quality for each standard requirement. The SRT 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 SRT 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 SRT has not yet finalized consensus on Content and Quality scores on TPL-001-4, Requirements R1, R2, R3, R4, R5, R6, R7, and R8. Please see comments on the RE tab of the Grading Matrix regarding TPL-001-4 and its requirements, and comment on what you believe the SRT should consider in developing its final content scores on these requirements. Also, please comment on whether the standard’s content is clear and well-understood.

Comments:
We generally support the comments made for TPL-001-4 in the RE tab. Additionally, we believe R7 should be retained, but should be the first requirement of the Standard.

The standard needs to further address an existing discrepancy and provide clarification as follows:

- **Use of non-consequential load loss:** In the Table 1 included in the standard, the use of non-consequential load loss is allowed under Footnote 12 conditions for P1, P2, and P3 planning events for elements operated at EHV level. However, the planning events P4 and P5, which would include the same elements as in P1, P2 & P3, do not allow the use of non-consequential load loss at EHV level.

Regarding Table 1, if the performance requirements (steady state / stability) are not being met, and if Table 1 indicates that non-consequential load loss and interruption of Firm Transmission Service are allowed. Is a specific corrective action plan required as per Requirement 2.7 (assuming that non-consequential load loss and/or interruption of Firm Transmission Service would allow for meeting the performance requirements)? This is an example scenario where Footnote 12 does not apply. Recommendation is to clarify within the standard whether or not a specific corrective action plan is required to be documented, as per Requirement 2.7, in the Planning Assessment for this scenario

- **Location of the fault while “component failure of a Protection System” is studied:** Generally, in the planning studies the faults are applied on the buses since they produce the more severe system impacts. However, when the “component failure of a Protection System” is considered, a bus fault or a close in fault may still be cleared remotely by using back up protections (remote 21 timed, 51, 51N etc....). However, when the fault location is moved along the circuits there may be locations on some of the circuits, where the faults will remain un-cleared, since the remote back up protection systems may not be able to detect it.

- **Applying P5 criteria to certain non- BES elements connected to BES buses (e.g., radial circuits supplying loads).** The standard needs to clarify which protection systems are subject to it since an un-cleared close in fault on a non-BES element connected to a BES bus has the same consequence as an un-cleared close in fault on a BES element. Do the protection systems installed on non-BES elements but connected to BES buses and therefore providing protection to the BES bus (the stub bus portion of the non-BES element is part of the BES bus) need to meet redundancy criteria of P5?
An alternative the SRT can consider to revising the standard is to provide a guideline that addresses the discrepancy and provides clarification.

Requirement 4.1 states, “Studies shall be performed for planning events to determine whether the BES meets the performance requirements in Table 1.....” Immediately after 4.1, sub-requirements 4.1.1 through 4.1.3 specify specific performance requirements, which are not mentioned in Table 1. This apparent discrepancy is confusing. Recommendation is to add sub-requirements 4.1.1 through 4.1.3 to Table 1.

2. Is the existing language of MOD-032-1 in Requirement 1, “jointly develop” clear and well-understood? Please explain your response.

☐ Yes
☐ No

Comments:
The language is well understood. However, we would like the SRT to consider the following changes should the standard be considered for review:

(1) Applicable to R2 - we would like to see the removal of the need for each balancing authority, generator owner, load serving entity, resource planner, transmission owner and transmission service provider etc. annually reporting to the PC if data has not changed since last submission (this is an administrative overburden on all parties which adds no value) and report/submit data only if data has changed.

(2) Applicable to R4 - Removal of the need to submit short circuit data to the Electric Reliability Organization (ERO) or its designee to support creation of the Interconnection-wide short circuit cases (no such cases are created) or needed.

3. Is the language of FAC-001-2, Requirements R2, R3, and R4 confusing or ambiguous as to cause a reliability concern or a concern between auditor and entity that is not adequately captured by the existing language? Please explain your response.

☐ Yes
☐ No

Comments:

4. At least two PRs will begin in 2018 from the following standards and standards families eligible for PRs: BAL-003, COM-001, COM-002, FAC-001, FAC-002, IRO-009, MOD-032, and TPL-001 standards.
Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2018? Please explain your response.

Comments:
We believe TPL-001 should be prioritized for review in 2018 since it can benefit from various clarifications.

The SRT should consider the following in determining highest priority for review in 2018:
- BAL-003 – It seems that the process where NERC publishes the list of events for each interconnection at least quarterly so BAs can calculate performance throughout the year is delayed. The SRT should consider whether this publishing timeframe is still feasible.
- Whether any comments received regarding the current content of these standards can be addressed through alternative tools such as guidelines.

Whether past comments received during the balloting of these standards were not sufficiently addressed, and continue to be repeated during the standards grading process.

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

Comments:
The questions for quality and content as indicated on the Grading Workbook are ambiguous in many cases and should be clarified in future versions of Standard Grading Activities.