Unofficial Comment Form

Project 2009-02 Real-time Monitoring and Analysis Capabilities
IRO-018-1 and TOP-010-1

DO NOT use this form for submitting comments. Use the electronic form to submit comments on IRO-018-1 – Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities and TOP-010-1 – Real-time Reliability Monitoring and Analysis Capabilities. The electronic comment form must be completed by 8 p.m. Eastern, Monday, November 9, 2015.

Documents and information about this project are available on the project page. If you have any questions, contact Standards Developer, Mark Olson (via email), or at (404) 446-9760.

Background Information

Project 2009-02 Real-time Monitoring and Analysis Capabilities originated in 2009 in response to work done by the NERC Operating Committee's Real-time Tools Best Practices Task Force (RTBPTF). The project SAR was revised earlier this year to account for proposed revisions to TOP and IRO standards developed in Project 2014-03 that are pending regulatory approval. Project 2009-02 is developing requirements to address monitoring and analysis capability issues identified in the 2008 RTBPTF report and the 2011 Southwest Outage Report, as well as addressing FERC Order No. 693 directives.

The Standard Drafting Team (SDT) developed two proposed Reliability Standards to meet the objectives outlined in the project SAR. IRO-018-1 – Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities addresses issues related to the quality and availability of Reliability Coordinator (RC) monitoring and analysis capabilities. TOP-010-1 – Real-time Reliability Monitoring and Analysis Capabilities contains similar proposed requirements for Transmission Operators (TOPs) and Balancing Authorities (BAs).
Questions

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. The SDT has proposed a new standard IRO-018-1 to address RC monitoring and analysis capability issues identified in project SAR. Do you agree with the proposed standard? If you do not agree, or if you agree but have comments or suggestions for the proposed standard provide your recommendation and explanation.

☐ Yes
☒ No
Comments: By Part 1.1 stating “Criteria for evaluating potential Real-time data quality discrepancies...” implies that a contingency analysis has to be done. Suggest removing “potential” from Part 1.1.

Language in R1.1 uses “but not limited to”. That language is too open ended and cannot be audited. Compare it to R3 use of “shall include”. “But not limited to” only belongs in a Measurement.

R2 is a bit ambiguous in whether a single data point of bad quality needs to be flagged or if the aggregate data is so bad that the state estimator can’t solve.

Suggest replacing the word “any” from R3 and R4 (relative to “any analysis”) and replacing with “reliability related” as “any” could be too broadly applied or interpreted. Additionally, the term analysis is broad. Standards related to Project 2014-03, approved through NERC as of this time, define such things as Real Time Assessments and Operational Planning Analysis. It’s not exactly clear what analysis would be referring to.

2. The SDT has proposed a new standard TOP-010-1 to address TOP and BA monitoring and analysis capability issues identified in project SAR. Do you agree with the proposed standard? If you do not agree, or if you agree but have comments or suggestions for the proposed standard provide your recommendation and explanation.

☐ Yes
☒ No
Comments: Each requirement is unique to a particular functional entity. Requirements can be eliminated by having each requirement refer to Transmission Operator and Balancing Authority.
Similarly to IRO-018-1, language in R1.1 uses “but not limited to”. That language is too open ended and cannot be audited. Compare it to R3 use of “shall include”. “But not limited to” only belongs in a Measurement.

R2 is a bit ambiguous in whether a single data point of bad quality needs to be flagged or if the aggregate data is so bad that the state estimator can’t solve.

Suggest replacing the word “any” from R5 and R6 (relative to “any analysis”) and replacing with “reliability related” as “any” could be too broadly applied or interpreted. Additionally, the term analysis is broad. Standards related to Project 2014-03, approved through NERC as of this time, define such things as Real Time Assessments and Operational Planning Analysis. It’s not exactly clear what analysis would be referring to.

3. 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:

4. 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 your recommendation and explanation.

☐ Yes
☐ No
Comments:

5. Provide any additional comments for the Standard Drafting Team (SDT) to consider, if desired.
Comments:

Even though IRO-018-1 and TOP-010-1 are applicable to different functional entities, the contents are repetitive. It would be less cumbersome if one standard could be generated that would be applicable to all the functional entities.

Results based standards should focus on the “what” or objective opinions express by some are that the standard is overly prescriptive and could be more suited to a guideline document.