Unofficial Comment Form
Standards Efficiency Review

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System to provide feedback on the Standards Efficiency Review (SER) Standards Authorization Request. Comments must be submitted by 8 p.m. Eastern, Wednesday, September 26, 2018.

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

Background
Many NERC Reliability Standards have been mandatory and enforceable for 10+ years in North America. Phase 1 of the SER project seeks to identify requirements that are potential candidates for retirement because they are no longer essential for reliability. Retiring these requirements would increase efficiencies by reducing regulatory obligations and/or compliance burden. Using a risk-based approach, three SER teams [Real-time Operations (RT), Long-term Planning (LT), and Operations Planning (OP)] evaluated the reliability benefit of each requirement in the body of NERC Reliability Standards. Based on the analyses, the SER teams are recommending the requirements listed in this posting be retired. The SER Team maintains that these requirements can be retired without impacting any other standards; i.e., no modifications to other requirements in other standards are necessary. Phase 2 of the SER Project will focus on modifying and/or consolidating requirements throughout the body of standards.

Questions
1. Do you agree with the recommendations and rationales to retire the proposed requirements? If not, please state the standard(s) and requirement number(s) in your response(s) along with your rationale(s) for not retiring the requirement(s).

☐ Yes
☒ No

Comments:
We agree with the majority of the retirement recommendations of the SER teams in all but a few instances. These are listed below:

INT-009-2.1 R2
The SAR rationale is that it is redundant with NAESB business practices. However, NAESB rules are not applicable in Ontario. While NAESB is more stringent, during reliability curtailments, system operators require flexibility given to them by INT-010 to manage the e-tags.

IRO-002-5 R4
This requirement is needed for the system operator to manage the grid.

IRO-008-2 R6
Keeping impacted entities informed in a timely fashion is good operating practice.

**TOP-001-4 R16**
This requirement is needed for the system operator to manage the grid.

**TOP-001-4 R17**
This requirement is needed for the system operator to manage the grid.

In the rationale presented to retire COM-002-4 R2, the SER is assuming or expecting that initial training for each of its operating personnel responsible for the Real-time operation of the interconnected Bulk Electric Systemis being covered in PER-005-2. PER-005-2 does not prescribe what training entities must include.

In the rationale presented to retire EOP-005-3 R8, the SER is assuming or expecting that System restoration is a reliability-related task and would be included in an entity's training program for its System Operators. PER-005-2 does not prescribe what training entities must include.

**FAC-003-4 Requirements R5 and R6:** These requirements should be retired because R5 and R6 are controls and good utility practices but do not enhance BES reliability over R1 and R2. R1 and R2 fulfil the purpose of the standard through measurable actions. Also, the NERC Rules of Procedure allow consideration for extenuating circumstances relative to R5.

**FAC-008-3 Requirement R8:** Requirements R.8.1.2 and R8. 2 are not duplicative of TOP-003-3 or IRO-010-2. FAC-008-3 Requirement R8.2 necessitates that TOs provide to their associated RCs, PCs, TPs, TOs and TOPs the Requirement R8.1.2 “identity of the most limiting equipment of the Facilities,” Requirement R8.2.1 “identity of the existing next most limiting equipment of the Facilities,” and Requirement R8.2.2 “Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1,” whereas the TOP-003-3 or IRO-1010-2 standards do not appear to have this requirement.

**IRO-010-2 Requirement R1** specifies the types of data that an RC collects from applicable entities, so that the RC may perform OPAs, RTM and RTAs. The OPA RTM and RTA definitions (in the NERC Glossary of Terms) each mention “Facility Ratings” as an input (into OPA’s, RTM and RTA’s). However, neither IRO-010-2, Requirement R1, nor the OPA, RTM and/or RTA definitions (in the NERC Glossary of Terms) contain the level of specificity in FAC-008-3 Requirement R8 (to “identity the most and the existing next most limiting equipment of the Facilities” and “the Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1”). Similarly, TOP-003-3 Requirement R5 requires identified entities to fulfill a data specification provided by a BA or TOP so that OPAs, RTM, and RTA’s may be performed. As in the case of IRO-010-2 Requirement R1 and the OPA, RTM and RTA definitions, TOP-003-3 does not require identification of the most and the existing next most limiting equipment of the Facilities and the Thermal Rating for the next most limiting equipment identified in FAC-008-3 Requirement R8, Part 8.2.1.”
NUC-001-3 R1: The requirement is administrative in nature, as Requirement R1 actions are inherent in Requirement R2 since each entity “shall have in effect” an agreement.

2. Do you agree that NERC should proceed with this project?
   - Yes
   - No

Comments: