Unofficial Comment Form
Project 2016-01 Modifications to TOP and IRO Standards
Standards Authorization Request

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the Standards Authorization Request (SAR) developed by NERC Staff. The electronic comment form must be completed and submitted by 8:00 p.m. Eastern, Monday, February 22, 2016.

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

Background Information
On November 19, 2015, the Federal Energy Regulatory Commission (Commission) issued Order No. 817 approving nine TOP and IRO standards from Project 2014-03 and retiring or superseding 18 currently-enforceable standards. The proposed standards were developed in Project 2014-03 to address Commission concerns and reliability issues identified in the 2011 Southwest Outage Report, the Independent Experts Review Panel project, and stakeholder technical conferences. In approving the new TOP and IRO standards, the Commission issued three directives to modify the TOP and IRO standards to address additional reliability issues.

As described in the SAR, the Standard Drafting Team (SDT) for this project will develop modifications to TOP-001-3 - Transmission Operations and IRO-002-4 - Reliability Coordination: Monitoring and Analysis to address Order No. 817 directives, or develop an equally efficient and effective alternative.

The modifications to TOP and IRO standards developed in this project will address the following reliability concerns identified in Order No. 817:

- **Monitoring non-Bulk Electric System facilities.** The Commission noted that "in some instances the absence of real-time monitoring of non-BES facilities by the transmission operator within and outside its TOP area as necessary for determining SOL exceedances in proposed TOP-001-3, Requirement R10 creates a reliability gap." (P.35)

- **Redundancy and Diverse Routing of Data Exchange Capabilities.** The Commission determined that, with respect to data exchange capabilities, the TOP and IRO standards requirements for Reliability Coordinators (RCs), Transmission Operators (TOPs), and Balancing Authorities (BAs) "do not clearly address redundancy and diverse routing so that registered entities will unambiguously recognize that they have an obligation to address redundancy and diverse routing as part of their TOP and IRO compliance obligations." (P. 47)

- **Testing of the Alternate or Less Frequently Used Data Exchange Capability.** The Commission determined that existing requirements do not establish a clear obligation for RCs, TOPs, and BAs to test alternative data exchange capabilities (P. 51).
Per Order No. 817, revised Reliability Standards addressing these issues must be filed for approval by July 2017.

Questions

1. Do you agree with the proposed scope for Project 2016-01 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

☐ Yes
☐ No
Comments:

2. Provide any additional comments for the SDT to consider, if desired.

Comments:

The SAR should allow the SDT to explain the meaning of “diverse routing” and “redundancy”. A glossary term may not be needed but an explanation of the intent will be required to facilitate compliance. Also, as a general comment, FERC wanted to limit “redundancy and diversity” to data exchange between RC, TOP and BA so the SDT will need to avoid capturing other entities like TO and DP into this requirement.