Comment Form for 6th Draft of Standards for Real-Time Operations (Project 2007-03)

Comments on the 6th draft and successive ballot of the standards for Real-Time Operations (Project 2007-03) must be submitted by January 12, 2012. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Background Information:
In the 6th posting for Project 2007-03, the Real-Time Operations Standard Drafting Team (RTOSDT) has attempted to clarify the proposed changes to the TOP family of standards based on industry comments received for the 5th posting and suggestions made during the Quality Review. Changes made were:

TOP-001-2:

- Changed the title of the standard to ‘Transmission Operations’ to better reflect the content of the standard.
- Based on Quality Review feedback changed the Purpose of the standard to more fully align with the requirements of the revised standard.
- Revised Requirement R1 to note that a Reliability Directive should be identified as such
- Deleted ‘upon recognition’ from Requirement R2
- Deleted ‘all other’ from Requirement R3
- Added Reliability Coordinator to Requirement R5
- Deleted Generator Operator from Requirement R6 and clarified that the requirement was for ‘telemetry equipment’
- Deleted the 30 minute limit from Requirement R9 and replaced it with references to Facility Rating and Stability criteria
- Deleted the 30 minute limit from Requirement R11 to correspond with the change in Requirement R9
- Made a semantic change for clarity to Measure M2
- Changed the Time Horizons for Requirements R3, R5, and R8
- VSLs for Requirements R3, R5, and R6 were changed to move away from percentages
- The language for the VSLs in Requirements R2, R6, & R8 was clarified
- Based on Quality Review feedback modified the Data Retention section to reflect the current NERC Rules of Procedure.
TOP-002-3:

- Revised Requirement R2 to read as a positive statement rather than as a double negative
- Added the term “NERC” as a modifier of “registered entities” in Requirement R3
- Changed the VRF for Requirement R3 to Medium
- Modified the VSLs for Requirement R1
- Based on Quality Review feedback modified the Data Retention section to reflect the current NERC Rules of Procedure.

TOP-003-1:

- Based on Quality Review feedback, the Purpose of the standard has been modified to more fully align with the requirements of the revised standard.
- The bullets under Requirement R1, Part 1.1 have been deleted.
- Added new Requirement R2 to separate out the responsibilities of Balancing Authorities from Requirement R1.
- In response to Quality Review feedback, modified the language in Requirements R3 and R4 to clarify which data the Transmission Operator and Balancing Authority are to distribute.
- Made conforming changes to Measures to reflect changes to the Requirements.
- Based on Quality Review feedback, modified the Data Retention section to reflect the current NERC Rules of Procedure and Drafting Team Guidelines for evidence retention.
- Made conforming changes to VSLs to reflect changes to Requirements.

Other changes:

- The definition of Reliability Directive has been modified by Project 2006-06 to read as follows:

  “A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impacts.”
You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. The SDT made changes to TOP-001-2 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

   If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

   □ Yes
   □ No

Comments: Requirements R1 and R2 should not be separate. Having them broken out in this manner could potentially put entities in double jeopardy when non-compliance occurs. The original language provided for a very narrow limitation on the reasoning and the contact; and they were tied together. This language somewhat allows for the potentially different reasoning being allowed for one’s inability to provide notice. If each function needs to be separate, then Requirement R4 should be broken down into two requirements. Requirement R4 states that information is being requested, AND is available.

In TOP-001-2 R3 the phrase “known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis” is confusing. The Glossary defines Emergency as any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System. The Glossary defines Operation Planning Analysis as “An analysis of the expected system conditions for the next day’s operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.).” What is the difference between TOPs KNOWN to be effected by an anticipated Emergency from those EXPECTED to be effected by an anticipated Emergency? The Requirement should state TOP’s expected to affected by an anticipated Emergency. Those TOP’s known to be affected are part of the group expected to be affected.

Operations Planning occurs in the Day ahead. An actual Emergency does not occur in the Day Ahead. The word actual should be removed. The SDT should scope R3 to the concept of Operational Planning as defined in the Glossary. The Time Horizon in the Requirement is Operations Planning.

Suggest rewording Requirement R3 to:

   R3. Each Transmission Operator shall inform its Reliability Coordinator and those Transmission Operators that are expected to be affected by an anticipated Emergency based on its assessment of its Operational Planning Analysis.
Without an expressed time period for the notification in R6, doesn’t this create an opportunity for broad interpretations of what is permissible and what’s not? It also allows for inconsistent treatment. An auditor’s view might be very different from an entity’s view. Also, regarding TOP-001-2 R6, which states “Each Balancing Authority and Transmission Operator shall notify the Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetering equipment, control equipment and associated communication channels between the affected entities.” This is a big concern. If there is coordination and notification between Reliability Coordinators, but no notification by one of the Reliability Coordinator’s to the entities within the affected other Reliability Coordinator’s footprint, would that be non-compliant? To ensure proper communications, notifications, and awareness there should only be one Reliability Coordinator communicating to its entities. It is impractical for Balancing Authorities and Transmission Operators to “drill down” and have to notify entities outside of their footprints of the aforementioned planned outages.

Regarding TOP-001, Requirement R8:
The drafting team needs to define the term “internal area reliability” in order to improve the clarity of the standard. Double jeopardy is introduced with TOP-001 R8 and FAC-014 R5.2. Fac-014 R5.2 states “The Transmission Operator shall provide any SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area”; while TOP-001 R8 states “Each Transmission Operator shall inform its Reliability Coordinator of each SOL which, while not IROLs, have been identified by the Transmission Operator as supporting its internal area reliability based on its assessment of its Operational Planning Analysis.”

2. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☒ No

Comments: The phrasing of the Requirement R1 does not match the rationale box. Based on the Rationale R1, suggest that the requirement should either state the requirement for a process to conduct an Operational Planning Analysis for the next day, or shall conduct an Operational Planning Analysis for the next day. It seems the team could phrase this as a Risk Based Requirement.

R1. The Transmission Operator shall CONDUCT an Operational Planning Analysis for the next day’s planned operations within its Transmission Operator Area to identify where Facility Ratings or Stability Limits will be exceeded during anticipated normal and Contingency event conditions.
Requirement R2 uses a phrase each System Operating Limit (SOL) which, while not an IROL, has been identified by the Transmission Operator as supporting its internal area reliability, identified as a result of the Operational Planning Analysis performed in Requirement R1 that implies an SOL exists in the TOP area that was not identified pursuant to FAC-011 R2 and communicated per FAC-014 R5. SOL’s that affect a TOP internal area would also affect the RC area. The Drafting Team needs to define the term “internal area reliability” in order to improve the clarity of the standard (see Question 1 comments regarding TOP-001 Requirement R8).

Regarding Requirement R3, would notifying GO’s of “their roles” in the IROL/SOL mitigation plan provide them market power or represent a violation of Order 888 Firewall?

3. The SDT made changes to TOP-003-1 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

   - [ ] Yes
   - [X] No

   Comments: TOP-003 R1 and R2 require data specifications for real-time monitoring. R5 obligates the TO, LSE, and Generator Owners to provide this real-time data. These entities provide a wealth of SCADA data that is utilized in real-time monitoring by TOPs and BAs. It is not clear that a communication error or data quality error for several contiguous time periods or intermittent quality issues would not trigger a violation. This could become an overwhelming compliance issue.

   TOP-003 R5 has only a severe VSL. Data providers can provide hundreds if not thousands of points to TOPs. If one RTU goes down is the data provider going to be assessed a severe VSL?

4. The VRF, VSL, and Time Horizons are part of a non-binding poll. If you do not support these assignments or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

   - [ ] Yes
   - [ ] No

   Comments:
5. If you have any other comments on this Standard that you have not already provided in response to the prior questions, please provide them here.

Comments: TOP-001-2 is referencing a NERC definition for “Reliability Directive” which is not in effect today and is listed on the Definitions of Terms Used in Standard Section on page 2. It is stated that the definition of “Reliability Directive” would be written by the Reliability Coordinator Standards Drafting Team (Project 2006-06), and post it for vetting by the industry sometime in the future. If this standard is approved now and the definition for “Reliability Directive” changes because of the Project 2006-06 work, the TOP standards will have to be revisited. The Project 2006-06 Drafting Team should be coordinating its work with this project to develop an “across the board” usable definition.

This Comment Form states under Background Information:

   o The definition of Reliability Directive has been modified by Project 2006-06 to read as follows:

   “A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impacts.”

It is not apparent where the 2006-06 team added "Adverse Reliability Impacts" to the definition. This change also impacts compliance to COM-002.