Comment Form for 5th Draft of Standards for Real-Time Operations (Project 2007-03)

Comments on the 5th draft and initial ballot of the standards for Real-Time Operations (Project 2007-03) **must be submitted by June 9, 2011.** If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

**Background Information:**
In the 5th 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 4th posting and suggestions made during the Quality Review. Changes made were:

**TOP-001-2:**
- Update to the definition of Reliability Directive based on the efforts of Project 2006-06 which is responsible for the content of the definition.
- Clarification to Requirement R2 that it is an ‘identified’ Reliability Directive that is in question. Plus, the Time Horizon was adjusted to add ‘Operations Planning’.
- Grammatical change to Requirement R3 changing ‘of’ to ‘by’.
- Grammatical change to Requirements R5 and R6 to eliminate the use of ‘coordinate’.
- Change ‘local’ area reliability to ‘internal’ area reliability in Requirement R8.
- Change the VRF for Requirement R9 from High to Medium.
- Clarification in Requirement R11 that 30 minutes is the timeframe for the indicated SOLs.
- Deleted Requirements R12 & R13 as they will be covered in Project 2009-02.
- Corresponding wording changes were made to the Measures and VSLs to match the revised wording in the Requirements.
- Fix a typo in Measure M10.
- Updated the Compliance Enforcement Authority language.
- Fixed the language in the VSL for Requirement R3 to match the actual requirement language.
- Clarify the intent of the SDT with regard to the VSL for Requirement R5.

**TOP-002-3:**
- Adjusted the Purpose Statement.
- Clarification to the rationale provided for Requirement R1.
- Made grammatical changes to Requirement R2 and updated ‘local’ to ‘internal’ as per TOP-001-2.
- Changed ‘reliability’ to ‘registered’ in Requirement R3.
- Added ‘while not an IROL’ to Measure M2.
- Made corresponding language changes to the Measures and VSLs to match the language changes in the Requirements.
- Updated the Compliance Enforcement Authority language.
- Clarified the intent of the SDT with regard to the VSL for Requirement R3.
TOP-003-1:

- Grammatical changes to Requirement R1.
- Added ‘web postings’ to Measures M2 and M3.
- Clarified Measure M4.
- Updated the Compliance Enforcement Authority language.
- Eliminated a redundancy in the VSL for Requirement R2.

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 process. 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: In Requirement R2, there is a need to specify how much time should be allowed to “inform its Transmission Operator upon recognition of its inability to perform an identified Reliability Directive issued by that Transmission Operator.” Suggest rewording R2 to read: Each Balancing Authority, Distribution Provider, Load-Serving Entity, and Generator Operator shall immediately inform its Transmission Operator of its inability to perform a Reliability Directive.

In Requirement R4, we suggest the following rearrangement of the sentence to improve readability:

R4: Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, unless such actions would violate safety, equipment, regulatory, or statutory requirements, and provided that the requesting entity has implemented its comparable emergency procedures.

The requirement(s) (R9, 10 and 11) that stipulate returning SOLs which “have been identified as supporting internal area reliability” within 30 minutes should be modified to allow the TOP and RC to determine the appropriate timeframe for correcting such limits. The maintenance of Interconnection reliability and Bulk Electric System integrity is paramount, and global specifications may or may not be appropriate for a local area. Suggest modifying the appropriate wording to: within a specified time not to exceed the timeframe specified by the TOP. R9 is redundant to R11; delete R9.
2. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review process. 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:

3. The SDT made changes to TOP-003-1 in response to industry comments and the Quality Review process. 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: Referring to the second bullet under R1, Part 1.1, “...Facilities at voltage levels lower than the BES;” these facilities are not enforceable under the NERC Standards. Any such references should be removed.

Editorial comment: remove M5 because there is no corresponding R5.

4. The VRF, VSL, and Time Horizons are part of a non-binding poll. Do you support the proposed VRF, VSL and Time Horizon assignments?

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: Referring to the Moderate and High VLSs for TOP-001-2 Requirements R3, R5, R6 and R8, where these VLSs state “...more than x% or less than or equal to y%...”, suggest changing to “...more than x% and less than or equal to y%...”. These changes would also make these VLSs consistent with the language of TOP-002-3 and TOP-003-2.
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: