Unofficial Comment Form
Project 2014-03 Revisions to TOP/IRO Reliability Standards
TOP-001-3

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the Standard. The electronic comment form must be completed by [January 6, 2015](#).

If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

Additional information about this project is available on the [project page](#).

**Background Information - Project 2014-03 - Revisions to TOP/IRO Reliability Standards**

On November 21, 2013, FERC issued a [NOPR](#) proposing to remand three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards and four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards. In the NOPR, FERC stated that NERC “has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.”

In response, NERC filed a [motion](#) requesting that FERC defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR and afford time to review the proposed TOP and IRO Standards through the NERC standards development process. That motion to defer action was granted on January 14, 2014.

The drafting team formed to address those concerns has made revisions to the TOP and IRO standards proposed to be remanded, along with several other IRO standards to provide consistency amongst the TOP and IRO standards, to address NOPR issues and recommendations made by the Independent Expert Review Panel, the IRO five-year review team (FYRT), and the 2011 SW Outage Report. In the ballot that ended September 19, 2014, all of the standards except TOP-001-3 achieved greater than the required two thirds ballot pool approval. The SDT has reviewed stakeholder comments submitted in that comment period and made only clarifying and non-substantive changes to all of the standards except TOP-001. No changes were made to the definitions or implementation plan.

The SDT has made numerous changes in the fourth posting for proposed TOP-001-3 in order to respond to industry comments raised in the third posting.

- Requirement R1 – removed the ‘direct action’ language to alleviate concerns about potential double jeopardy issues as direct actions are included in other standards and requirements where necessary; replaced ‘address’ with ‘maintain’.

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**RELIABILITY | ACCOUNTABILITY**
• Requirement R2 - removed the ‘direct action’ language to alleviate concerns about potential double jeopardy issues as direct actions are included in other standards and requirements where necessary; replaced ‘address’ with ‘maintain’.

• Requirements R3, R4, R5, and R6 – removed the Load-Serving Entity as an applicable entity following the recent Board action on removing Load-Serving Entity as a functional entity. (Note – Load-Serving Entity was not removed from proposed IRO-010-2 or proposed TOP-003-3 as those standards have already been approved by industry and the Board. Load-Serving Entity will be removed from those standards when the overarching project to remove Load-Serving Entity is initiated.)

• Requirement R7 – Added the phrases ‘within its Reliability Coordinator Area’ (as Transmission Operators will only be expected to react to requests from other Transmission Operators within the Reliability Coordinator Area and any assistance for Transmission Operator Areas outside the Reliability Coordinator Area will be done through requests from the Reliability Coordinators) and ‘comparable’ assistance (to assure that a transmission Operator isn’t asked to do go further than the requesting Transmission Operator has done).

• Requirement R9 – added ‘known’ as a qualifier for impacted entities; clarified that the requirement is for all outages by adding ‘planned and unplanned’ as qualifiers to outages; replaced ‘sustained’ by ‘30 minutes or more’ to achieve clarity and consistency with other standards.

• Requirement R10 – deleted the phrase ‘non-BES’ as any need for non-BES data will be defined in the Reliability Coordinator SOL methodology and included in BES as part of BES Exception Process as necessary; clarified that an entity does not have to ‘monitor’ outside of its Transmission Operator Area – it only needs to utilize necessary data.

• Requirement R11 – replaced the phrase ‘perform its reliability functions’ with more specific language – ‘maintain Load-interchange balance within its Balancing Authority Area and support Interconnection frequency’.

• Requirement R15 – capitalized ‘System’

• Requirement R16 – made the language for the list of applicable outages consistent with that of the language in Requirement R9.

• Requirement R17 - made the language for the list of applicable outages consistent with that of the language in Requirement R9.

• Made commensurate changes in matching Measures and cleaned up language in Measures M8 and M12.

• Made commensurate changes to VSL language and changed the VSL for Requirement R11 from binary to incremental.

• Added language to the SOL Exceedance White Paper explaining that the Reliability Coordinator’s SOL methodology will specify requirements to include any non-BES data or external data in order for a Transmission Operator to determine SOls in accordance with the Reliability Coordinator’s SOL methodology.

Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

Commenters are reminded that this is not a forum for questioning the issues raised in the FERC NOPR of November 21, 2013 but to objectively evaluate the work of the SDT in responding to the issues raised in the NOPR, and the recommendations made by the Independent Expert Review Panel (IERP), the IRO FYRT, and the SW Outage Report.
Questions

1. Do you agree with the changes made to respond to industry comments to proposed TOP-001-3? If not, please provide technical rationale for your disagreement along with suggested language changes.

   Yes:  

   No:  X

Comments: Regarding Requirement R13, there is concern that an operator will be obligated to perform the assessment. Given that the Rationale for Requirement R13, although not auditable, supports the Requirement’s wording, suggest revising the Rationale Box to read:

The new requirement R13 is in response to NOPR paragraphs 55 and 60 concerning Real-time analysis responsibilities for Transmission Operators and is copied from approved IRO-008-1, Requirement R2. The Transmission Operator’s Operating Plan may describe how to perform the Real-time Assessment.

It would also be helpful to confirm that at times no actions may be required if system conditions have not changed within the thirty minute window and that previous contingency analysis or assessments may be used to perform the Real time Assessment for subsequent hours.

A suggested revision to Requirement R13:

R13. Each Transmission Operator shall ensure that a Real-time Assessment is performed at least once every 30 minutes, or in the timeframe specified in an Operating Plan when the Transmission Operator operates in a known state and is unable to perform the Real-Time Assessment every 30 minutes.

And for Measure M13:

M13. Each Transmission Operator shall have, and make available upon request, evidence to show it ensured that a Real-Time Assessment was performed at least once every 30 minutes, or in the timeframe specified in an Operating Plan when the Transmission Operator operates in a known state and is unable to perform the Real-time Assessment every 30 minutes. This evidence could include but is not limited to dated computer logs showing times the assessment was conducted, dated checklists, or other evidence.

Appropriate wording consistent with this should be added to Section F. Associated Documents.