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 8:00 p.m. EST **Monday, November 10, 2014.**

If you have questions please contact Ed Dobrowolski at 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, 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 third posting for proposed TOP-001-3 in order to respond to industry comments raised in the second posting.
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: We commented in the last posting to replace the word “ensure” in requirements R1 and R2, and in the standard’s other requirements where applicable. We note that “ensure” has been replaced with “address”. The Purpose of the standard is “To prevent instability, uncontrolled separation, or Cascading outages that adversely impact the reliability of the Interconnection by ensuring prompt action to prevent or mitigate such occurrences.” “Maintain” or “restore” are more appropriate words to use than “address”. The Time Horizon should only be “Real-time Operations”. “Ensure” in Measure M1 should also be replaced with the word selected to be used in R1.

   Regarding Requirement R3, Time Horizons should only be “Real-time Operations”.

   The 30 minute requirement in Requirement R13 is too restrictive and is inconsistent with EOP-008 which allows two hours to restore such functionality. If entities are permitted two hours to restore situational awareness following an evacuation, entities should be granted the same time consideration to restore Real-time assessment capability in R13. Therefore we recommend either of the following revisions to R13:

   • Each Transmission Operator shall perform a Real-time Assessment at least once every two hours.
   • Each Transmission Operator shall perform a Real-time Assessment at least once every 30 minutes when the EMS and SCADA are functional. Following the loss of EMS, a Transmission Operator shall regain ability to perform Real-time assessments within two hours.

   Requirement R7 has removed an important concept of TOP-001-1a Requirement R6. A supporting TOP should not be obligated to activate emergency procedures beyond those activated by the TOP that is in the emergency. As an example, a supporting TOP should not be obligated to go into voltage reduction if the TOP with the emergency as not take the same voltage reduction action first. Simply stating, ‘... has implemented its Emergency procedures,’ is not specific. TOP-001-1a Requirement R6 reads:
R6. Each Transmission Operator, Balancing Authority, and Generator Operator shall render all available emergency assistance to others as requested, provided that the requesting entity has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, or regulatory or statutory requirements.

Recommend the following change to R7 to target the TOP’s requirement to assist other TOPs to those in the same RC area:

R7. Each Transmission Operator shall assist other Transmission Operators within their Reliability Coordinator’s region, if requested and able, provided that the requesting entity has implemented its Emergency procedures, unless such assistance cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]

In Part 10.2 the phrase ‘... as necessary by the TOP’ is unclear. What TOP? Part 10.2 should be revised to be consistent with Part 10.1 and read:

10.2. Outside its Transmission Operator Area:

Sub-parts 10.1.3 and 10.2.3 should be made consistent.

“Ensure” remains in the posted requirement R13. Suggested rewording R13:
Each Transmission Operator shall perform or have performed a Real-time Assessment at least once every 30 minutes.

The “s” in system should be capitalized in Requirement R15.

R3, M3, M4, R5, M5, M6 all use the words to comply with operating instructions, but R4 and R6 use the words perform an operating instruction. The wording should be consistent.

Measure M7 should be corrected to be written like M3 and M5 in the past tense: “...unless such assistance could not be physically implemented…”

Measure M8 should be revised since R8, and the first part of M8 refer to operations “that result in, or could result in, an Emergency”. Therefore, the last sentence in M8 should read: “If no such situations have occurred, the TOP may provide an attestation.”

Requirement R11 directs the Balancing Authority to “…monitor its Balancing Authority Area, including the status of Special Protection Systems that impact generation or Load…” Monitoring Special Protection Systems is not a function of the Balancing Authority. Requirement R11 can be removed.

Should M11 use the same examples of evidence as does M10, for example Energy Management System description documents?
M12 should have a broader scope. If the auditor is to verify that the TOP did not operate outside IROL for a duration exceeding IROL $T_V$, then the TOP should provide information on all occasions in which he operated outside IROL for any period of time. This would reflect the RSAW’s audit approach. M12 should read:

“Each Transmission Operator shall make available evidence to show that for any occasion in which it operated outside any identified Interconnection Reliability Operating Limit (IROL), the continuous duration did not exceed its associated IROL $T_V$. Such evidence could include but is not limited to dated computer logs or reports in electronic or hard copy format specifying the date, time, duration, and details of the excursion. If such a situation has not occurred, the Transmission Operator may provide an attestation that an event has not occurred.”

For IROLs there is a maximum exceedance duration specified, but for SOLs in R14/M14 there is no leeway. Thus if a SOL is exceeded for 30 seconds, the TOP must have evidence it initiated its Operating Plan. This applies also for the VSL in the Table of Compliance Elements. No difference is made if the TOP initiates its Plan within the minute or after half an hour. Entities generally have very many SOL exceedances a year and to document each of them a proof of Implementation of a Plan is unrealistic. Whereas IROLs may be more severe than SOLs, the measure is less stringent.

In the C. Compliance section, under 1.3 Data Retention, Measure M14 is mentioned in the second and third paragraphs giving it two different data retention periods. There is a typing error in the fourth paragraph referring to R13/M13: “Each TOP shall each keep data (...).” Remove the second “each”.

In the Table of Compliance Elements there is a typing error in the last paragraph for Severe VSL listing for R8: “or more than 15%”.

For R9, replace “and” with “or” because generally only one of the elements will be outaged. The VSLs should be revised to read “...sustained outage of telemetering or control equipment, or monitoring or assessment capabilities, or associated communication channels.”

R10 and R11 should have similar VSLs. Presently if the TOP does not monitor a facility, it will be a Moderate VSL but if the BA does not monitor a facility, it is a severe VSL. Everything is lumped together for the BA whereas in reality it is not an all or nothing situation. R11 should therefore have VSLs equivalent to those in R10.

R14 should have different VSLs depending on the time it took the TOP to initiate its Operating Plan.

R15 should have different VSLs depending on the time it took the TOP to inform its RC.

Requirement R15 appears to be past tense, ‘inform.. RC of actions taken...’. So one would believe that a pre-call is not required before actions are taken by the TOP. What is the purpose of this requirement? What is the added value in informing the RC after the fact of the actions that were taken to mitigate SOL exceedances? The TOP should be obligated to notify the RC if it cannot manage the exceedance on its
own and needs assistance (another requirement). However, notifications via SCADA should be sufficient to address the concern.

M15 – This measure does not include multi-modal communications. The TOP should be able to take credit for telemetered information (breaker operations) that communicates to the RC actions that have been taken. Also there is no time component for when to report. For example during, 5 minutes after, a day after.

The word “own” should not be deleted from Requirement R16. It provides clarity that this is only pertaining to the equipment the Transmission Operator owns and not other equipment.

The new requirement R19 addresses the data exchange capabilities needed. If non-BES facilities are to be included anywhere in the standard, they should be included in the BES by exception, especially since they are contributing to a SOL exceedance.

R19 and R20 seem redundant with R10 and R11 since in R10 and R11 the TOP and BA are monitoring reliability required data, and they must have the data exchange capabilities. Also, TOP-003-3 requires the TOP to develop data specifications to support Real-time monitoring and operation of the BES, and negotiate with data supplying entities the format, period and security protocol of the data exchange. This implies the requirement of a data exchange capability. We suggest removing R19 and R20.

What defines a neighboring Transmission Operator Area? There are many instances where the loss of a facility in, let’s say in Transmission Operator Area “A”, which is not electrically “adjacent” to Transmission Operator Area “B”, impacts Transmission Operator Area “B”.