Comment Form for 7th Draft of Standards
Project 2007-03 Real-time Operations

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the 7th draft and successive ballot of the standards for Real-time Operations (Project 2007-03) must be submitted by April 20, 2012. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at (609) 947-3673.

Background Information:

This posting represents a successive ballot for TOP-001-2, TOP-002-3, and TOP-003-2.

In the 7th 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 6th posting and suggestions made during the Quality Review. Changes made were:

TOP-001-2:
- Requirement R1 – Allowed for plural Transmission Operators and deleted second instance of ‘identified’
- Requirement R6 – changed ‘the’ to ‘its’ Reliability Coordinator
- Requirement R8 – changed ‘internal area’ to ‘internal to its Transmission Operator Area’; changed the Time Horizon to only Operations Planning
- Requirement R10 – changed ‘each’ SOL to ‘an’ SOL
- Data Retention – Changed voice recordings to 90 calendar days from three calendar months
- Revised VSLs for Requirements R1, R3, R5, and R10

TOP-002-3:
- Requirement R2 - changed ‘internal area’ to ‘internal to its Transmission Operator Area’

TOP-003-1:
- Applicability – added Distribution Provider
- Requirement R2 – added analysis functions for the Balancing Authority
- Requirement R3 – Cited the tie to Requirement R1 and made the language in Requirement R3 consistent with that in Requirement R1
- Requirement R4 - Cited the tie to Requirement R2 and made the language in Requirement R4 consistent with that in Requirement R2
- Requirement R5 – added Distribution Provider
- Measures M3 and M4 – clarified the web posting item of evidence
• Revised VSLs for Requirements R1, R2, R3, and R4

The Implementation Plan and effective dates for all three standards now show a twelve month compliance period for all requirements except Requirements R1, R2, R3, and R4 of TOP-003-2 which will become effective ten months from the approval date.
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: It is written in FAC-014-2 R5.2:

R5.2. 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.

This already mandates that the Transmission Operator provide its Reliability Coordinator SOLs. This requirement and TOP-001 R8 must be made to agree.

As explained in the redline version of TOP-001:

“Rationale: The class of SOL included in Requirements R8, R9, and R11 was created in response to industry comments that there were SOLs that deserved increased attention. Examples of such SOLs include WECC Path SOLs, SOLs on transmission facilities maintaining service to significant events or buildings, such as the stadium for major nationally televised events, prominent government buildings, and military installations.”

It is understood that the impacts of some SOLs may attract increased attention because of the operational implications of them being exceeded. It must also be realized that every SOL has a reliability impact. The added wording adds unneeded complication to the Requirement. Will the proposed requirement create a new class of SOLs that might include any that might be “intermittent” in nature, such as those occurring during televised events, etc.? This becomes a moving target, and it may become problematic for keeping track of those SOLs to which these requirements apply, i.e., those that require notification to the Reliability Coordinator, versus those which don’t. Regardless, operator responses to any SOL’s on their systems should be the same in terms of swiftness and a sense of urgency.

The phrase “supporting reliability internal” is used in R8. What constitutes “supporting reliability internal”? This may present compliance issues. Experience has shown that the use of the terms
internal, external, local, wide area have presented auditing difficulties that generated documentation issues.

2. The SDT made changes to TOP-003-2 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:

3. The SDT made changes to TOP-003-2 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:

4. The SDT is suggesting the retirement of three requirements in PRC-001 since those requirements deal with data handling and can now be incorporated in the data specification concept suggested for TOP-003-2. 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:

5. The VRF, VSL, and Time Horizons are part of a non-binding poll. Please indicate whether you agree or disagree with the 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:

6. If you have any other comments on these standards that you have not already provided in response to the prior questions, please provide them here.

Comments: TOP-001 uses the term “Reliability Directive” which is dependent on a definition developed in Project 2006-06 Reliability Coordination. Because of the development of this definition in both Projects, NERC should post these projects simultaneously to gain industry support to move these projects forward.