From:	Guy V. Zito
To:	rsballot
Cc:	rscmembers
Subject:	NERC Ballot 2007-06.2 Phase 2 of System Protection Coordination | TOP-009-1 , Retirement of PRC-001-1.1(ii)
Date:	Wednesday, November 18, 2015 3:06:21 PM
Attachments:	image001.png

NPCC Members and Entities of the NERC Registered Ballot Body,

The subject standard project is currently posted for an "Additional" ballot through **8pm November 19th**, 2015. The Regional Standards Committee (RSC) members have reviewed the TOP-009 standard and proposed retirement of PRC-001. The RSC has not reached a full consensus on a ballot position. The primary issue raised precluding consensus support is that PER-005 and its requirement for entities to have a systematic approach to training is already covered and the proposed TOP-009 issue of requiring "knowledge" of protection systems is not necessary. Also some believe the TOP-009 standard is unnecessary and creates a double jeopardy should non-compliance with the proposed TOP-009 and existing PER-005 occur.

The drafting team indicated why they believe that the PER does not cover the issues identified in TOP-009. In their view, there are three significant reasons that TOP-009-1 is needed beyond the PER. First, it addresses a specific reliability objective that is beyond the intent of PER-003 (i.e., operating credentials), which addresses protection and control for the Balancing Authority and Transmission Operator. Second, PER-005 (i.e., personnel training) would not necessarily capture the specifics (i.e., operational functionality and effects) anticipated by TOP-009-1 consistently by all TOP-009-1 applicable entities (Balancing Authority, Generator Operator, and Transmission Operator); however, personnel training is one acceptable "method," as shown in the Measures, that an entity may employ to comply with TOP-009-1. Third, PER-003 is not applicable to the Generator Operator and PER-005 has limited applicability for this entity that is not focused on plant level operating personnel. A recent webinar poll of 56 (41% of the attendees) indicated that a third would not be using a formal PER-005 program as a method to comply with TOP-009-1.

NPCC as the Regional Entity and upon consideration of all viewpoints does not see any adverse impacts to reliability with the proposed actions of this project. Additionally, CMEP disallows double jeopardy non-compliance determinations for any potential redundancies. Therefore NPCC will cast an **Affirmative** ballot and **Positive** opinion in the non-binding poll. NPCC and RSC members will be submitting supporting comments and position statements.

Please contact me with any questions.

Thanks,

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