Unofficial Comment Form
Standards Efficiency Review
Operational Data Simplification Standard Authorization Request

The Standards Efficiency Review (SER) Phase 2 Team seeks industry input on the draft Operational Data Simplification Standard Authorization Request (SAR). Do not use this form for submitting comments. Use the Checkbox survey to submit comments by 8:00 p.m. Eastern, Monday April 27, 2020. Please coordinate feedback into a single response for each organization or entity.

Additional information about the project is available on the SER project page. For more information or assistance, contact Senior Standards Developer, Chris Larson (via email) or at (404) 446-9708.

Background
The scope of SER Phase 2 effort is to evaluate NERC Reliability Standards (O&P and CIP), as informed by implementation experiences and compliance practices, to develop and recommend standards-based solutions intended to reduce inefficiencies and unnecessary regulatory burdens for the purpose of supporting continued safe, secure and reliable operations.

Questions
1. Do you believe there is an opportunity for efficiency gain outlined in the SAR?

   ☑ Yes
   ☐ No

   Comments:

2. Do you agree a clarification of expectations is needed for the core BES reliability-related tasks and associated “data specification”?

   ☐ Yes
   ☑ No

   Comments:

In lieu of BES reliability-related tasks, we suggest that the scope be revised to focus on data collected or provided in support of: Real-time monitoring (RTM) and Real-time Assessments (RTA) in support of the standards below:

- Operational Planning Analysis (OPA) for the RC and TOP (see IRO-008-2, R1 and TOP-002-4, R1)
- Operating Plans for the next-day for the BA (see TOP-002-4, R4)
- Real-time Assessments (RTA) for the RC, TOP and BA (see IRO-008-2 and TOP-001-4)
- Real-time monitoring (RTM) for the RC, TOP and BA (see IRO-002-6 and TOP-001-4)
3. Do you agree with the secondary purpose of the SAR, which is evaluating the retirement of duplicative operational data exchange requirements dispersed in other standards?

☑ Yes
☐ No

The standards IRO-010 and TOP-003 should not be the clearing house for all information exchanged between entities. For example, Blackstart Resource information requirements may be a better fit with EOP-005. This would retain the review of Blackstart Resource information requirements with EOP-005 as a whole and negate the need to perform off-cycle reviews and/or revisions to IRO-010 and TOP-003 when changes are made to EOP-005.

4. Do you recommend any specific language revisions to the SAR?

☐ Yes
☑ No

The current standards IRO-010-2 and TOP-003-3 already define the relevant functions needing real-time data to develop their Operational Planning Assessments and Operating Plans as the RC, TOP and BA.