Unofficial Comment Form
Project 2021-06 Modifications to IRO-010 and TOP-003
Standard Authorization Request

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on 2021-06 Project 2021-06 Modifications to IRO-010 and TOP-003 Standard Authorization Request (SAR). Comments must be submitted by 8 p.m. Eastern, Wednesday, February 9, 2022.

Additional information is available on the project page. If you have questions, contact Standards Developer, Josh Blume (email), or at 404-446-2593.

Background Information
The primary purpose of this project is to simplify administrative burdens identified by the SER Phase 2 Team associated with the current IR0-010-3 and TOP-003-4 standards and limit unnecessary data requirements that do not contribute to BES reliability and resiliency. As written the standards create a zero-defect expectation for each Registered Entity receiving a data specification to demonstrate perfect performance on every item in the data specification for an entire audit period. This can result in unnecessary administrative burdens for the Registered Entity to demonstrate compliance, including excessive data retention. If instead, a risk-based approach was developed and performance was triggered upon an event or unresolved data conflicts between entities, then the purpose of the standards would be achieved in an effective and efficient manner.

The secondary purpose of this project is to evaluate removing other data exchange requirements dispersed in other standards. The drafting team would need to evaluate those requirements after proposed changes to the IR0-010 and TOP-003 are developed to determine if they are within the scope of the four tasks and consequently within the scope of IRO-010 and TOP-003. This may require enhancing the standards to allow each Registered Entity with responsibilities to perform the tasks identified in IRO-010-2 and TOP-003-3 the ability to request and receive any information it needs from other Registered Entities to perform those tasks.

Based on the review and discussions, the DT modified the SAR and re-posted a third draft for a 30-day informal comment period. The main substantive modifications to the SAR include, but are not limited to: 1) deleting a line giving the drafting team the ability to create requirements in this project; 2) focusing the SAR’s scope on clarifying data transmission methods; 3) clarifying what standards are effected by the SAR, along with re numbering TOP-003 and IRO-010 to reflect the most current versions.
Questions

1. Do you agree with the redline modifications made to the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

☐ Yes
☐ No

Comments:

We agree with the project, however, please consider updating the SAR to ensure that references to standards are the most recent NERC Board Adopted and/or FERC approved versions of the standards. For example, IRO-010-4 and TOP-003-5 become effective on April 1, 2023, and were part of project 2019-06 Cold Weather. FAC-014-3, IRO-008-3, and TOP-001-6 were part of project 2015-09 Establish and Communicate System Operating Limits and were NERC Board Adopted on June 11, 2021, and were filed with FERC on June 17, 2021.

2. Provide any additional comments for the drafting team to consider, if desired.

Comments: