

## Comment Report

**Project Name:** 2021-06 Modifications to IRO-010 and TOP-003 | Draft 2  
**Comment Period Start Date:** 5/5/2023  
**Comment Period End Date:** 6/21/2023  
**Associated Ballots:** 2021-06 Modifications to IRO-010 and TOP-003 Implementation Plan AB 2 OT  
2021-06 Modifications to IRO-010 and TOP-003 IRO-010-5 AB 2 ST  
2021-06 Modifications to IRO-010 and TOP-003 TOP-003-6 AB 2 ST

There were 64 sets of responses, including comments from approximately 179 different people from approximately 119 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## **Questions**

- 1. To support the proposed modifications, the SDT has revised the VSLs in both IRO-010-5 and TOP-003-6 to account for the clarified data specification criteria. Do you agree? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.**
- 2. Provide any additional comments regarding IRO-010-5 for the SDT to consider.**
- 3. Provide any additional comments regarding TOP-003-6 for the SDT to consider.**
- 4. Provide any additional comments for the SDT to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Midcontinent ISO, Inc.	Bobbi Welch	2	MRO,RF,SERC	ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010_TOP-003	Ali Miremadi	CAISO	2	WECC
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Helen Lainis	IESO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Bobbi Welch	MISO	2	RF
					Greg Campoli	NYISO	2	NPCC
					Elizabeth Davis	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Portland General Electric Co.	Daniel Mason	6		Portland General Electric Co.	Brooke Jockin	Portland General Electric Co.	1	WECC
					Adam Menendez	Portland General Electric Co.	3	WECC
					Ryan Olson	Portland General	5	WECC

						Electric Co.		
					Daniel Mason	Portland General Electric Co	6	WECC
Public Utility District No. 1 of Chelan County	Glen Pruitt	1		CHPD Voters	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Rebecca Zahler	Public Utility District No. 1 of Chelan County	5	WECC
					Anne Kronshage	Public Utility District No. 1 of Chelan County	6	WECC
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Ryan Strom	Buckeye Power, Inc.	1,5	RF

					Ryan Strom	Buckeye Power, Inc.	1,5	RF
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO

					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company -	5	SERC

						Southern Company Generation		
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC

					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Joshua London	Eversource Energy	1	NPCC
Stephen Whaite	Stephen Whaite			ReliabilityFirst Ballot Body Member and Proxies	Lindsey Mannion	ReliabilityFirst	10	RF
					Stephen Whaite	ReliabilityFirst	10	RF



Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative,	3	SERC

	Inc.		
Tony Gott	KAMO Electric Cooperative	3	SERC
Micah Breedlove	KAMO Electric Cooperative	1	SERC
Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. To support the proposed modifications, the SDT has revised the VSLs in both IRO-010-5 and TOP-003-6 to account for the clarified data specification criteria. Do you agree? If you do not agree, or if you agree but have comments or suggestions for the SDT please provide your recommendation and explanation.

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

The word “use” in VSLs does not apply to all criteria (e.g., R5.) BPA suggests a change to either “meet” or “satisfy.”

Likes 0

Dislikes 0

**Response**

**Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies**

**Answer** No

**Document Name**

**Comment**

As noted in the comments for questions 2 and 3, RF does not support the inclusion of the “mutually agreeable” language in the clarified IRO-010 R1 and TOP-003 R1 and R2 data specification criteria. The criteria containing the “mutually agreeable” language are referenced in the IRO-010 R1/R3 and TOP-003 R1/R2/R5 VSLs, so RF has selected a “No” response for this question.

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer** No

**Document Name**

**Comment**

By adding more specific requirements to R1.5, the requestor and receiver must track progress and ensure they are meeting those requirements. This would add administrative burden for the requestor and receiver and possibly add zero defect requirements. The requirements in R1.5 appear to build upon the old requirements in TOP-003-5 R5. However, it is unclear why the original language was insufficient, so it is not clear any change is needed.

Likes 0

Dislikes 0

### Response

#### Casey Perry - PNM Resources - 1,3 - WECC,Texas RE

Answer

No

Document Name

### Comment

Recommend “and/or” statement in the Standard Requirements and VSL’s due to not clear on what information is included in the “and information” statement.

Likes 0

Dislikes 0

### Response

#### Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

### Comment

The proposed edits to the VSL tables (IRO-010-5 / R3 and TOP-003-6 / R5), in conjunction with the requirement sub-parts referenced therein, fail to add sufficient clarity. Considering IRO-010-5 for example, the VSL table for R3 references “the criteria in Requirement R1 Parts 1.5” [should it be “Part 1.5” (no “s”)?). R1 Part 1.5 addresses “methods for the entity identified in Part 1.1 to provide data and information”. Is a method for providing data and information synonymous with a criteria for the data and information? Since R1 Part 1.5.2 is the only sub-part to mention performance criteria (as determined by the RC), was it the intent of the drafting team to make the VSL table refer to it (i.e., “...criteria in Requirement R1 Part 1.5.2”)?

With regard to the SAR’s stated purpose to “limit unnecessary data retention requirements that do not contribute to BES reliability and resiliency”, we note that the data retention period for those that provide data and information is unchanged in these Draft 2 standards. The submitting entity is required to “retain evidence for the most recent 90-calendar days that it has satisfied the obligations of the documented specifications.” However, if the entity’s last audit period has been more than 90 days ago (highly probable), “the CEA may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit”. How does this address the unnecessary data retention concern cited in the SAR?

Likes 0

Dislikes 0

**Response**

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer** No

**Document Name**

**Comment**

The addition of the words "and Information" to the VSLs does not provide a meaningful change. Further clarification is required on what "information" is being requested.

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer** Yes

**Document Name**

**Comment**

No comments

Likes 0

Dislikes 0

**Response**

**Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer** Yes

**Document Name**

**Comment**

AZPS Agrees with the proposed modification to the VSLs in both IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

**Response**

**Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro****Answer** Yes**Document Name****Comment**

BC Hydro appreciates the Standard Drafting Team's efforts and the opportunity to comment. We noted that in the Violation Severity Levels for Requirements R3 of IRO-010-5 and R5 of TOP-003-6, the "obligations of the" wording was removed. Requirements R3 and R5 and their associated measures maintain the "shall satisfy the obligations of the documented specifications" wording.

BC Hydro suggest that the wording be revised to align the Requirements and VSLs for consistency; otherwise, please provide clarification on the materiality of these distinctions if they were intentional.

Likes 0

Dislikes 0

**Response****Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF****Answer** Yes**Document Name****Comment**

None.

Likes 0

Dislikes 0

**Response****Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company****Answer** Yes**Document Name****Comment**

Southern Company supports the comments provided by EEI.

Likes 0

Dislikes 0

**Response**

**Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF**

**Answer** Yes

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group**

**Answer** Yes

**Document Name**

**Comment**

WEC Energy Groups supports EEI and NAGF comments.

Likes 0

Dislikes 0

**Response**

**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF**

**Answer** Yes

**Document Name**

**Comment**

The NAGF supports the proposed VSL revisions in both IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

**Response**

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Nicolas Turcotte - Hydro-Quebec (HQ) - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>R1 Low VRF in VSL Table: "The Reliability Coordinator did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".</p> <p>Version history table: Version 3 indicates that FERC approved IRO-010-2 in Docket RD20-4-000. Please correct to IRO-010-3 as v3 was part of the Standards Alignment with Registration Project in RD20-4-000.</p> <p>Suggest for IRO-010-5 adds 1.5.2 which says, "Performance criteria for the availability and accuracy of data and information, as applicable." (for RCs)</p> <p>Please consider that adding a new requirement to IRO-010-5 involving the availability and accuracy of data and information may increase administrative burden.</p>	
Likes 0	
Dislikes 0	



**Response**

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Answer** Yes

**Document Name**

**Comment**

EEl does not object to the changes made to the VSLs in IRO-010-5 and TOP-003-6.

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Texas RE noticed the following in the VSLs for TOP-003-6:

- In order to be consistent, Texas RE recommends adding “and information” in the latter part of the “or” statement in the R1 and R2 severe VSL.
- It appears that in the R4 VSL, data should not be capitalized.
- In the high VSL for R5, it should state R1.5, not R15.

Texas RE noticed the following the VSLs for IRO-010-5:

- In order to be consistent, Texas RE recommends adding “and information” in the latter part of the “or” statement in the R1 severe VSL.
- In the Lower, Moderate, and High VSLs for R3, “part” should not be plural since it is only referencing Part 1.5.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response**

**Kinte Whitehead - Exelon - 3**

**Answer**

Yes

**Document Name**

**Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response**

**David Jendras Sr - Ameren - Ameren Services - 3**

**Answer**

Yes

**Document Name**

**Comment**

Ameren supports EEI's comments on this project.

Likes 0

Dislikes 0

**Response**

**Kimberly Turco - Constellation - 6**

**Answer**

Yes

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

**Alison MacKellar - Constellation - 5**

**Answer**

Yes

**Document Name**

**Comment**

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

Yes

**Document Name**

**Comment**

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

**Response**

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 3 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD Voters**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Julie Hall - Entergy - 6, Group Name Entergy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Donald Lock - Talen Generation, LLC - 5****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****James Keele - Entergy - 3****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Michael Courchesne - ISO New England, Inc. - 2 - NPCC****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gordon Joncic - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Claudine Bates - Black Hills Corporation - 6**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Micah Runner - Black Hills Corporation - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Diana Torres - Imperial Irrigation District - 6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruchi Shah - AES - AES Corporation - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 1, 6, 5; Sarah Blankenship, Salt River Project, 3, 1, 6, 5; Thomas Johnson, Salt River Project, 3, 1, 6, 5; Timothy Singh, Salt River Project, 3, 1, 6, 5; - Israel Perez**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Donna Wood - Tri-State G and T Association, Inc. - 1**



Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1</b>	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

**Response**

**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Teresa Krabe - Lower Colorado River Authority - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public**

<b>Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Pedro Juarez, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Likes 0

Dislikes 0

**Response****Stephen Stafford - Georgia Transmission Corporation - NA - Not Applicable - SERC****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010\_TOP-003**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mike Magruder - Avista - Avista Corporation - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Daniel Mason - Portland General Electric Co. - 6, Group Name** Portland General Electric Co.

**Answer**

**Document Name**

**Comment**

Portland General Electric Company supports comments provided by the EEI.

Likes 0

Dislikes 0

**Response**

**2. Provide any additional comments regarding IRO-010-5 for the SDT to consider.**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC**

**Answer**

**Document Name**

**Comment**

R1 Low VRF in VSL Table: "The Reliability Coordinator did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".

Version history table: Version 3 indicates that FERC approved IRO-010-2 in Docket RD20-4-000. Please correct to IRO-010-3 as v3 was part of the Standards Alignment with Registration Project in RD20-4-000.

Suggest for IRO-010-5 adds 1.5.2 which says, "Performance criteria for the availability and accuracy of data and information, as applicable." (for RCs)

Please consider that adding a new requirement to IRO-010-5 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

**Response**

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

**Document Name**

**Comment**

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

**Response**

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer**

**Document Name**

**Comment**

It is not clear how broadening the scope of the standard from a data specification which is clear, to an overly broad data and information specification adds clarity. It would be more beneficial if the standard covered clear requirements for a data specification that supported Operation Planning Analysis, Real-time monitoring and Real-time Assessment criteria. Information should be clearly defined.

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010\_TOP-003**

**Answer****Document Name****Comment**

No comment

Likes 0

Dislikes 0

**Response**

**Alison MacKellar - Constellation - 5**

**Answer****Document Name****Comment**

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

**Kimberly Turco - Constellation - 6**

**Answer****Document Name**



**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response****Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer****Document Name****Comment**

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

**Response****Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC****Answer****Document Name****Comment**

We suggest that the standard title reflected in the page headers be consistent with the title in section A.1.

For the Purpose statement in section A.3, we suggest that "Monitor" not be capitalized since it's not a defined term in the NERC Glossary of Terms. We would also prefer an Oxford comma be placed after monitor – "...plan, monitor, and assess...". This would also be consistent with the purpose statement phrasing in Draft 2 of TOP-003-6.

We believe the Project reference in section A.5 should be updated to "Project 2021-06", rather than "Project 2019-06".

For R1/Part 1.1, we suggest the added phrase "and identification of the entity responsible for responding to the specification" be changed to "and identification of the **entities** responsible for responding to the specification".

For R1/Part 1.5, we suggest some minor edits and re-ordering:

1.5. **Methods and criteria** for the **entities** identified in Part 1.1 to provide data and information that includes, but is not limited to:

1.5.1 A mutually agreeable method(s) for securely transferring data and information;

1.5.2 A mutually agreeable format **for the data and information**;

1.5.3 Specific deadlines or periodicity in which data and information is to be provided;

1.5.4 Provisions to update or correct data and information, as applicable or necessary; and,

1.5.5 Performance criteria for the availability and accuracy of data and information, as applicable.

Likes 0

Dislikes 0

### Response

**Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer**

**Answer**

**Document Name**

**Comment**

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

### Response

**David Jendras Sr - Ameren - Ameren Services - 3**

**Answer**

**Document Name**

**Comment**

Ameren recommends section 1.5.1 to read "Mutually agreeable deadlines or periodicity in which data and information is to be provided;". Also, the proposed wording in section 1.5.5 is plurally incorrect. The wording in R3 changes from singular "specification" to plural "specifications".

Likes 0

Dislikes 0

### Response

**Kinte Whitehead - Exelon - 3****Answer****Document Name****Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response****Daniel Gacek - Exelon - 1****Answer****Document Name****Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response****Casey Perry - PNM Resources - 1,3 - WECC,Texas RE****Answer****Document Name****Comment**

PNM agrees with and supports EEI's comments related to IRO-010-5.

Likes 0

Dislikes 0

**Response****Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC****Answer**

**Document Name****Comment**

WECC generally supports the proposed revisions, but has a slight concern with the language in Part 1.4. The requirement is applicable to the RC, but requires a "mutually agreeable process." The RC could have difficulty complying with the language of Part 1.4 if the other identified entities will not agree to a process.

Likes 0

Dislikes 0

**Response**

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer****Document Name****Comment**

1.5.5 has a grammatical error with the use of "A" (singular) and "methods" (plural). How it is corrected may change the interpretation.

Likes 0

Dislikes 0

**Response**

**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

**Answer****Document Name****Comment**

1. R1 Low VRF in VSL Table: "The Reliability Coordinator did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".

2. Version history table: Version 3 indicates that FERC approved IRO-010-2 in Docket RD20-4-000. Please correct to IRO-010-3 as v3 was part of the Standards Alignment with Registration Project in RD20-4-000.

Suggest for IRO-010-5 adds 1.5.2 which says, "Performance criteria for the availability and accuracy of data and information, as applicable." (for RCs)

Please consider that adding a new requirement to IRO-010-5 involving the availability and accuracy of data and information may increase administrative

burdens.

Likes 0

Dislikes 0

## Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

### Answer

#### Document Name

#### Comment

Texas RE noticed the Effective Date section on both TOP-003-5 and IRO-010-5 need to be updated to reflect the implementation plan for Project 2021-06.

Texas RE noticed the applicability section is formatted inconsistently with other standards, which show:

#### 4. Applicability

##### 4.1 Functional Entities

##### 4.1.1 [Functional Entity #1]

##### 4.1.2 [Functional Entity #2]

If the SDT elects to make this change, Texas RE recommends Requirement Part 1.5 state: "Methods for the *functional* entity identified in Part 1.1 to provide the data and information that includes, but is not limited to:"

In requirement Part 1.5, "methods" should be singular.

Texas RE noticed the implementation plan contains a consideration for "developing provisions for using intermediary entities to provide data". Texas RE recommends the requirement language reflect this idea as this regularly occurs in the ERCOT region with information from the TOP to the BA. Texas RE recommends the following language:

*1.6 Provisions for the identification of any data and information where the responsible respondent identified in Part 1.1 will utilize an intermediary party to pass through the data and information unaltered from the responsible entities to the Transmission Operator.*

This language is also consistent with CIP-012-1, which requires protection of data even through the intermediary entity.

In order to be consistent throughout the entire standard document, Texas RE recommends Section C "Compliance" be revised to remove use of "data" where included in "data specification" (in the last three paragraphs of Section C 1.2) to be consistent with proposed Requirement language changes in

Requirements R2 and R3.

Texas RE recommends adding “and information” in the Evidence Retention Section for IR-010-5 Requirement R1: “The Reliability Coordinator shall retain its dated, current, in force documented specification for the data *and information* necessary...”.

In the Evidence Retention Section for IR-010-5, Texas RE suggests capitalizing Compliance Audit or saying simply audit in the third paragraph as in the first paragraph.

Likes 0

Dislikes 0

## Response

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Answer**

**Document Name**

**Comment**

EEl continues to have concerns with the proposed changes made to IRO-010-5 and question whether the proposed changes provide any discernible reliability benefits over the currently effective Reliability Standard. However, we offer the following edits to address our concerns with the current draft:

Requirement R1.

Part 1.1: The data and information should be specifically directed to “NERC registered entities” not entities “responsible for responding”. Entities who are not registered by NERC have no regulatory obligation to respond to data and information requests. Additionally, the identified NERC registered entity can only provide requested data and information that is under that entity’s direct control and access. To address these concern, the following suggested edits in bold are provided below:

A list of data and information needed by the Reliability Coordinator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, **if under the control and access of the identified NERC registered entity**, external network data and information, and identification of the **NERC registered** entity for responding to the specification as deemed necessary by the Reliability Coordinator.

Part 1.5: The methods identified should all be mutually agreed to, not just those in the subparts of Part 1.5.

Subpart 1.5.2: EEl does not support the inclusion of performance criteria for IRO-010-5 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary. Applying performance criteria to the delivery of data and information expands the administrative burden on entities creating a zero defect requirement that this project was intended to correct.

Measure M1: EEl suggests the following additional language to M1 (see bold text):

Each Reliability Coordinator shall make available its dated, current, in force documented specification for data and information **that conform to mutually agreed to methods, criteria, formats and secure transfer of data and information by the entities identified in Part 1.1.**

Likes 0

Dislikes 0

**Response**

**Nicolas Turcotte - Hydro-Quebec (HQ) - 1**

**Answer**

**Document Name**

**Comment**

R1 and R2 Low VRF in VSL Table: "The TOP/BA did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".

Suggest for TOP-003-6 R1 adds similar language: "Performance criteria for the availability and accuracy of data and information, as applicable." (for TOPs)

Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

**Response**

**Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster**

**Answer**

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for quesiton #2.

Likes 0

Dislikes 0

**Response**

**Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies**

**Answer**

**Document Name**

**Comment**

In response to the comment RF submitted for question 3 of the previous comment period, the SDT indicated “The SDT discussed the issue [w/ requiring mutually agreeable criteria to be included in the data specifications] and notes that the legacy language includes “mutually agreeable” paradigms already, and, therefore, has decided to keep that vernacular.”

In response to the above consideration of comments, RF notes that the legacy language places the responsibility for satisfying the obligations of the data specification using “mutually agreeable” means on the specification recipient.

RF reinforces that the RC (R1) should not be responsible for ensuring its data specification is mutually agreeable to every specification recipient (potentially 100s of receiving entities). The "mutually agreeable" language should be removed from the proposed IRO-010-5 R1 subparts regarding data formats, security protocols, and conflict resolution processes. It is unclear how mutually agreeable formats, security protocols, and conflict resolution processes could be included in a data specification prior to it being distributed to the entities responsible for responding. As currently drafted, demonstrating criteria within a specification are mutually agreeable would require the creator of the specification to maintain evidence that each of the many recipients of the specification accepts each “mutually agreeable” criteria.

Likes 0

Dislikes 0

**Response**

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer**

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

**Joshua London - Eversource Energy - 1, Group Name Eversource**

**Answer**

**Document Name**

**Comment**

Eversource agrees with the comments submitted by EEI and does not support the inclusion of performance criteria for IRO-010-5 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary.

Likes 0



Dislikes 0

**Response**

**Donna Wood - Tri-State G and T Association, Inc. - 1**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Ruchi Shah - AES - AES Corporation - 5**

**Answer**

**Document Name**

**Comment**

AESCE understands and agrees with the need for availability and accuracy of data and information under R1.5.2. However, AESCE would like to point out that criteria to ensure data accuracy must be practical to GO/GOP resources as well as mindful of the ability to demonstrate compliance with the sub-requirement.

AESCE also supports NAGF's comment regarding these changes.

Likes 0

Dislikes 0

**Response**

**Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Diana Torres - Imperial Irrigation District - 6**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF**

**Answer**

**Document Name**

**Comment**

The NAGF is concerned with how a GO/GOP would demonstrate the accuracy of data and information under R1.5.2. While the NAGF understands the need for and supports the communication of accurate data/information, criteria to ensure data accuracy needs to be practical and cognizant of limited GO/GOP resources.

For R1.5.3, the NAGF questions the value of potentially having to correct/update historical data.

Likes 0

Dislikes 0

**Response**

**Christine Kane - WEC Energy Group, Inc. - 3, Group Name** WEC Energy Group

**Answer**

**Document Name**

**Comment**

WEC Energy Groups supports EEI and NAGF comments.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**

Reclamation recommends the Project 2021-06 drafting team coordinate with the Project 2020-04 drafting team regarding use of the terms “availability” and “accuracy,” e.g., as used in IRO-010 R1.5.2. The CIP-012 terms “confidentiality,” “integrity,” and “availability” carry the same intent; therefore, for consistency, Reclamation recommends the language in the two standards should align.

Likes 0

Dislikes 0

**Response**

**Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company**

**Answer**

**Document Name**

**Comment**

Southern Company supports the comments provided by EEI.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

The edits proposed do not meet the goals set forth by SER Phase 2 and the SAR. Industry would be better served not to open the standards.

Likes 0

Dislikes 0

**Response**

**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF**

**Answer**

**Document Name**

**Comment**

Duke Energy is concerned with how a GO/GOP would demonstrate the accuracy of data and information under R1.5.2. Please define the implied accuracy specification and communication of data and information.

For R1.5.3, please define the parameters and limits for the correction and update of historical data.

Likes 0

Dislikes 0

**Response**

**Donald Lock - Talen Generation, LLC - 5**

**Answer**

**Document Name**

**Comment**

The standards in question are becoming impractical regarding compiling compliance evidence, and rather than making them even more complex in this respect (e.g. adding, "Performance criteria for the availability and accuracy of data and information") IRO-010-5 and TOP-003-06 should roll-back some of the overreach in their previous revisions. Generating unit minimum design/historical/analysis temperature should be a once-and-done input, for example, since these values will not change in the midst of a winter storm. The same should be done for cold weather operating limitations, with any real-time changes for fuel supply, emissions etc being reported by the same means that plants are already using for all (not just weather-related) issues affecting operations.

The Measures sections of IRO-010 and TOP-003 should also make it mandatory that receiving entities issue attestations for compliant units, rather than just leaving this as a possibility, if they use portal systems that swallow data inputs without leaving any electronic or hard copy record of transmittals.

Likes 0

Dislikes 0

**Response**

**Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer**

**Document Name**

**Comment**

AZPS does not have any addition comments regarding IRO-010-5 at this time.

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer**

**Document Name**

**Comment**

No comments

Likes 0

Dislikes 0

**Response**

**Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name** CHPD Voters

**Answer**

**Document Name**

**Comment**

No comment

Likes 0

Dislikes 0

**Response**

**3. Provide any additional comments regarding TOP-003-6 for the SDT to consider.**

**Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD Voters**

**Answer**

**Document Name**

**Comment**

The title change from Operational Reliability does seem necessary as this was vague, however, the current proposed title is only descriptive of the Specification and not the data it applies to. Also, collection seems to be tacked on at the end when it should be a descriptor of the specification. The Operational Reliability title was important to understand the scope of data and information that the specification applies to. Here are some alternative options to consider:

1. Transmission Operator and Balancing Authority Data, Information and Collection Specification for Operational Reliability
2. Transmission Operator and Balancing Authority Data, Information and Collection Specification
3. Transmission Operator and Balancing Authority Specification for Operational Reliability

Likes 0

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer**

**Document Name**

**Comment**

While the following text was not a revision proposed by the SDT, we believe the existing phrase "in force" within M1 could be improved and clarified by using another word or phrase in its place. Potential ideas for consideration might include "currently in effect" or "as currently used in practice" so that it instead states "its dated, documented specification currently in effect for data and information" or "its dated, documented specification as currently used in practice for data and information."

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer**

**Document Name**

**Comment**

No comments

Likes 0

Dislikes 0

**Response**

**Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer**

**Document Name**

**Comment**

AZPS does not have any addition comments regarding TOP-003-6 at this time.

Likes 0

Dislikes 0

**Response**

**Donald Lock - Talen Generation, LLC - 5**

**Answer**

**Document Name**

**Comment**

See our response for Question #2 above.

Likes 0

Dislikes 0

**Response**

**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF**

**Answer**

**Document Name**

**Comment**

Please see the response for Question #2 in regard to TOP-003-6 R1.5.2 and R1.5.3.



Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

The edits proposed do not meet the goals set forth by SER Phase 2 and the SAR. Industry would be better served not to open the standards.

Likes 0

Dislikes 0

**Response**

**Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company**

**Answer**

**Document Name**

**Comment**

Southern Company supports the comments provided by EEI.

Likes 0

Dislikes 0

**Response**

**Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**

Reclamation recommends the Project 2021-06 drafting team coordinate with the Project 2020-04 drafting team regarding use of the terms “availability” and “accuracy,” e.g., as used in TOP-003 R1.5.2 and R2.5.2. The CIP-012 terms “confidentiality,” “integrity,” and “availability” carry the same intent; therefore, for consistency, Reclamation recommends the language in the two standards should align.

Reclamation recommends grammatical corrections to the Purpose section of TOP-003 to properly address two entities. For example:

Purpose: To ensure that each Transmission Operator and Balancing Authority has the data and information it needs to plan, monitor, and assess the operation of its Transmission Operator Area or Balancing Authority Area.

Likes 0

Dislikes 0

**Response**

**Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group**

**Answer**

**Document Name**

**Comment**

WEC Energy Groups supports EEI and NAGF comments.

Likes 0

Dislikes 0

**Response**

**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF**

**Answer**

**Document Name**

**Comment**

Please see the comments for Question #2 in regard to TOP-003-6 R1.5.2 and R1.5.3.

Likes 0

Dislikes 0

**Response**

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Diana Torres - Imperial Irrigation District - 6**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Ruchi Shah - AES - AES Corporation - 5**

**Answer**

**Document Name**

**Comment**

Same response as question 2 for TOP-003-6 1.5.2 and 2.5.2.

Likes 0

Dislikes 0

**Response**

**Donna Wood - Tri-State G and T Association, Inc. - 1**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Joshua London - Eversource Energy - 1, Group Name Eversource**

**Answer**

**Document Name**

**Comment**

Subpart 1.5.2: Eversource agrees with the comments submitted by EEI and does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary.

Subpart 2.5.2: Eversource agrees with the comments submitted by EEI and does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 2.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections

where necessary.

Likes 0

Dislikes 0

**Response**

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer**

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

**Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies**

**Answer**

**Document Name**

**Comment**

In response to the comment RF submitted for question 3 of the previous comment period, the SDT indicated "The SDT discussed the issue [w/ requiring mutually agreeable criteria to be included in the data specifications] and notes that the legacy language includes "mutually agreeable" paradigms already, and, therefore, has decided to keep that vernacular."

In response to the above consideration of comments, RF notes that the legacy language places the responsibility for satisfying the obligations of the data specification using "mutually agreeable" means on the specification recipient.

RF reinforces that the TOP (R1) and BA (R2) should not be responsible for ensuring its data specification is mutually agreeable to every specification recipient (potentially 100s of receiving entities). The "mutually agreeable" language should be removed from the proposed TOP-003-6 R1 and R2 subparts regarding data formats, security protocols, and conflict resolution processes. It is unclear how mutually agreeable formats, security protocols, and conflict resolution processes could be included in a data specification prior to it being distributed to the entities responsible for responding. As currently drafted, demonstrating criteria within a specification are mutually agreeable would require the creator of the specification to maintain evidence that each of the many recipients of the specification accepts each "mutually agreeable" criteria.

Likes 0

Dislikes 0

**Response**

**Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster**

**Answer**

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for quesiton #3.

Likes 0

Dislikes 0

**Response**

**Nicolas Turcotte - Hydro-Quebec (HQ) - 1**

**Answer**

**Document Name**

**Comment**

R1 and R2 Low VRF in VSL Table: "The TOP/BA did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".

Suggest for TOP-003-6 R1 adds similar language: "Performance criteria for the availability and accuracy of data and information, as applicable." (for TOPs)

Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

**Response**

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Answer**

**Document Name**

**Comment**

EEI continues to have concerns with the proposed changes made to TOP-003-6 and question whether the proposed changes provide any discernible

reliability benefit over the currently effective Reliability Standard. However, we offer the following edits to address our concerns with the current draft:

#### Requirement R1.

Part 1.1: The data and information should be specifically directed to “NERC registered entities” not entities “responsible for responding”. Entities who are not registered by NERC have no regulatory obligation to respond to data and information requests. Additionally, the identified NERC registered entity can only provide requested data and information that is under that entity’s direct control and access. To address these concern, the following suggested edits in bold are provided below:

A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, **if under the control and access of the identified NERC registered entity**, external network data and information, and identification of the **NERC registered** entity for responding to the specification as deemed necessary by the Transmission Operator.

Part 1.5: The methods identified should all be mutually agreed to, not just those in the subparts of Part 1.5.

Subpart 1.5.2: EEI does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 1.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary. Applying performance criteria to the delivery of data and information expands the administrative burden on entities creating a zero defect requirement that this project was intended to correct.

Measure M1: EEI suggests the following additional language to M1 (see bold text):

Each Transmission Operator shall make available its dated, current, in force documented specification for data and information **that conform to mutually agreed to methods, criteria, formats and secure transfer of data and information by the entities identified in Part 1.1.**

#### Requirement R2

Part 2.1: The data and information should be specifically directed to “NERC registered entities” not entities responsible for responding. Entities who are not registered by NERC have no regulatory obligation to respond to data and information requests. Additionally, the identified NERC registered entity can only provide requested data and information that is under that entity’s direct control and access. To address these concern, the following suggested edits in bold are provided below:

A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, **if under the control and access of the identified NERC registered entity**, external network data and information, and identification of the **NERC registered** entity for responding to the specification as deemed necessary by the Transmission Operator.

Part 2.5: The methods identified should all be mutually agreed to, not just those in the subparts of Part 1.5.

Subpart 1.5.2: EEI does not support the inclusion of performance criteria for TOP-003-6 and asks that subpart 2.5.2 be deleted. The focus of the standard should be the receipt of correct data and information, with provisions to make corrections where necessary. Applying performance criteria to the delivery of data and information expands the administrative burden on entities creating a zero defect requirement that this project was intended to correct.

Measure M2: EEI suggests the following additional language to M2 (see bold text):

Each Transmission Operator shall make available its dated, current, in force documented specification for data and information **that conform to mutually agreed to methods, criteria, formats and secure transfer of data and information by the entities identified in Part 2.1.**

Likes	0
Dislikes	0

## Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE noticed the Effective Date section on both TOP-003-5 and IRO-010-5 need to be updated to reflect the implementation plan for Project 2021-06.

Texas RE noticed the applicability section is formatted inconsistently with other standards, which show:

4. Applicability

4.1 Functional Entities

4.1.1 [Functional Entity #1]

4.1.2 [Functional Entity #2]

If the SDT elects to make this change, Texas RE recommends Requirement Part 1.5 state: “Methods for the *functional* entity identified in Part 1.1 to provide the data and information that includes, but is not limited to:”

In requirement Part 1.5.5 and Requirement 2 Part 2.55, “methods” should be singular

Texas RE noticed the implementation plan contains a consideration for “developing provisions for using intermediary entities to provide data”. Texas RE recommends the requirement language reflect this idea as this regularly occurs in the ERCOT region with information from the TOP to the BA. Texas RE recommends the following language:

*2.6 Provisions for the identification of any data and information where the responsible respondent identified in Part 1.1 will utilize an intermediary party to pass through the data and information unaltered from the responsible entities to the Transmission Operator.*

SDT may consider minor changes in R5 for consistency:

**R5.** Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a *data specification for data and information* in Requirement R3 or R4 shall satisfy the obligations of the documented specifications. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations*]

In order to be consistent throughout the entire standard document, Texas RE recommends Section C Compliance section be revised to remove use of



“data” where included in “data specification” (in the last three paragraphs of Section C 1.2) to be consistent with proposed Requirement language changes in Requirements R2 and R3.

In the Evidence Retention Section for IRO-010-5 Requirement, Texas RE suggests capitalizing Compliance Audit or saying simply audit in the third and fourth paragraphs as in the first paragraph.

Likes 0

Dislikes 0

### Response

**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

**Answer**

**Document Name**

**Comment**

1. R1 and R2 Low VRF in VSL Table: “The TOP/BA did not include two or fewer of the parts ...” which is illogical since omitting zero parts would result in a violation. Consider changing to “one or two parts”.

Suggest for TOP-003-6 R1 adds similar language: “Performance criteria for the availability and accuracy of data and information, as applicable.” (for TOPs)

Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

### Response

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

1.5.5. and 2.5.5 have grammatical errors with the use of “A” (singular) and “methods” (plural). How it is corrected may change the interpretation.

Likes 0

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

**Answer**

**Document Name**

**Comment**

Similar to the comment above, WECC generally supports the proposed revisions, but has concern with the language in Parts 1.4. and 2.4. Since this requirement is applicable to the TOP (1.4) and BA (2.4), but requires a "mutually agreeable process," the TOP or BA could have difficulty complying if the other identified entities will not agree to a process.

Likes 0

Dislikes 0

**Response**

**Casey Perry - PNM Resources - 1,3 - WECC, Texas RE**

**Answer**

**Document Name**

**Comment**

PNM agrees with and supports EEI's comments related to TOP-003-6.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer**

**Document Name**

**Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response**

**Kinte Whitehead - Exelon - 3**

**Answer**

**Document Name**

**Comment**

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response**

**David Jendras Sr - Ameren - Ameren Services - 3**

**Answer**

**Document Name**

**Comment**

Ameren recommends section 1.5.1 to read "Mutually agreeable deadlines or periodicity in which data and information is to be provided;". Also,we believe, the proposed wording in section 1.5.5 is plurally incorrect. Ameren also recommends section 2.5.1 to read "Mutually agreeable deadlines or periodicity in which data and information is to be provided;". Also, the proposed wording in section 2.5.5 is plurally incorrect.

Likes 0

Dislikes 0

**Response**

**Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer**

**Answer**

**Document Name**

**Comment**

Minnesota Power agrees with EEI's comments.

Likes 0

Dislikes 0

**Response**

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer**

**Document Name**

**Comment**

We suggest the Purpose statement in section A.3 be phrased as follows – “*To ensure that the Transmission Operator and Balancing Authority have the data and information **they** need to plan, monitor, and assess the operation of **their** Transmission Operator Area **and** Balancing Authority Area, **respectively.**”*

We believe the Project reference in section A.5 should be updated to “Project 2021-06”, rather than “Project 2019-06”.

For R1/Part 1.1, we suggest the added phrase “and identification of the entity responsible for responding to the specification” be changed to “and identification of the **entities** responsible for responding to the specification”.

For R1/Part 1.5, we suggest some minor edits and re-ordering:

*1.5. Methods **and** criteria for the **entities** identified in Part 1.1 to provide data and information that includes, but is not limited to:*

*1.5.1 A mutually agreeable method(s) for securely transferring data and information;*

*1.5.2 A mutually agreeable format **for the data and information**;*

*1.5.3 Specific deadlines or periodicity in which data and information is to be provided;*

*1.5.4 Provisions to update or correct data and information, as applicable or necessary; and,*

*1.5.5 Performance criteria for the availability and accuracy of data and information, as applicable.*

For R2/Part 2.1, we suggest the added phrase “and identification of the entity responsible for responding to the specification” be changed to “and identification of the **entities** responsible for responding to the specification”.

For R2/Part 2.5, we suggest some minor edits and re-ordering:

*2.5. Methods **and** criteria for the **entities** identified in Part 1.1 to provide data and information that includes, but is not limited to:*

*2.5.1 A mutually agreeable method(s) for securely transferring data and information;*

*2.5.2 A mutually agreeable format **for the data and information**;*

*2.5.3 Specific deadlines or periodicity in which data and information is to be provided;*

*2.5.4 Provisions to update or correct data and information, as applicable or necessary; and,*

*2.5.5 Performance criteria for the availability and accuracy of data and information, as applicable.*

Likes 0

Dislikes 0

**Response**

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**Answer**

**Document Name**

**Comment**

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

**Response**

**Kimberly Turco - Constellation - 6**

**Answer**

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

**Alison MacKellar - Constellation - 5**

**Answer**

**Document Name**

**Comment**

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010\_TOP-003**

**Answer**

**Document Name**

**Comment**

No comment

Likes 0

Dislikes 0

**Response**

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer**

**Document Name**

**Comment**

It is not clear how broadening the scope of the standard from a data specification which is clear, to an overly broad data and information specification adds clarity. It would be more beneficial if the standard covered clear requirements for a data specification that supported Operation Planning Analysis, Real-time monitoring and Real-time Assessment criteria. Information should be clearly defined.

Likes 0

Dislikes 0

**Response**

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

**Document Name**

**Comment**

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

**Response**

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

R1 and R2 Low VRF in VSL Table: "The TOP/BA did not include two or fewer of the parts ..." which is illogical since omitting zero parts would result in a violation. Consider changing to "one or two parts".

Suggest for TOP-003-6 R1 adds similar language: "Performance criteria for the availability and accuracy of data and information, as applicable." (for TOPs)

Please consider that adding a new requirement to TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens.

Likes 0

Dislikes 0

Response

4. Provide any additional comments for the SDT to consider, if desired.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

Project 2022-04 updates CIP-012 by adding "availability" per FERC Order 886. We request that updates to IRO-010 and TOP-003's respond to this FERC Order, if they do not already respond. Another alternative is coordination between the two SDTs.

Please consider that adding new requirements to IRO-010-5 and TOP-003-6 involving the availability and accuracy of data and information may increase administrative burdens, which was not the intent of this project.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

Document Name

Comment

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer

Document Name

Comment

An item that is missing is identifying who is accountable for receiving and distributing data in accordance with a data specification submitted by an entity. There should be a consistent approach on how a Transmission Operator receives external data and information needed to support its Operational Planning Analyses, Real-time monitoring and Real-time Assessments. Either the BA or RC should be accountable for distribution of data



required for a TOP to perform its operational planning analysis, Real-time monitoring and Real-time Assessments so that it is consistent between all entities. The purpose of these two standards is to ensure that all entities have the data they need to perform their functions. Consistency should be considered as well as clear requirements and limits instead of broad definitions.

Likes 0

Dislikes 0

### Response

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name** ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010\_TOP-003

**Answer**

**Document Name**

**Comment**

No comment

Likes 0

Dislikes 0

### Response

**Alison MacKellar - Constellation - 5**

**Answer**

**Document Name**

**Comment**

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

### Response

**Kimberly Turco - Constellation - 6**

**Answer**

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**Answer**

**Document Name**

**Comment**

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

**Response**

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer**

**Document Name**

**Comment**

No additional comments.

Likes 0

Dislikes 0

**Response**

**Hillary Creurer - Hillary Creurer On Behalf of: Lori Frisk, Allete - Minnesota Power, Inc., 1; - Hillary Creurer**

**Answer**

**Document Name**

**Comment**

Minnesota Power agrees with MRO's NERC Standards Review Forum (NSRF) comments.

Likes 0

Dislikes 0

**Response**

**Bret Galbraith - Seminole Electric Cooperative, Inc. - 6**

**Answer**

**Document Name**

**Comment**

Seminole requests:

(1) The Standard Drafting Team to elaborate more on Operational Planning Analysis, Real-time Assessments, Real-time monitoring, and Balancing Authority analysis functions within the technical rationale so that entities can make sure they are capturing all proper analyses.

Likes 0

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

**Answer**

**Document Name**

**Comment**

No additional comments

Likes 0

Dislikes 0

**Response**

**Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators**

**Answer**

**Document Name**

**Comment**

We believe the updates made in this draft revision are in line with the SAR and clarify the requirements surrounding data specifications. Furthermore, we believe this revision provides needed clarity to the Violation Severity Levels by aligning them with the revised requirement language.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

### Response

**Jennie Wike - Jennie Wike On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer**

**Document Name**

**Comment**

Tacoma Power supports MRO NSRF's comments.

Likes 0

Dislikes 0

### Response

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

The primary purpose of the SAR is to simplify administrative burdens, reduce zero-defect expectations and limit unnecessary data retention requirements that do not contribute to BES reliability and resiliency. While the MRO NSRF commends the efforts by the SDT, there are no meaningful updates to the standards which achieve those goals in the new drafts. The nominal changes in language, or relocation of legacy language, doesn't achieve the overarching objectives of the SAR. Without such deliberate updates, consider maintaining the status quo of the current versions of the standards and cancelling the project in its current form. If the SDT elects to proceed, consider the additional comments:

The MRO NSRF still has concerns with the addition of the performance criteria of 'availability' within TOP-003 requirements 1.5.2, 2.5.2 and IRO-010 1.5.2 that without appropriate bounding language or allowances for unavailability (equipment/component failure, maintenance, et cetera). A data requestor may request 100% availability (allowable via the technical rationales), which would then create a 'zero defect' requirement.

Additionally, within the same requirements, MRO NSRF has similar concerns with the performance criteria of 'accuracy' without associated bounding language clearly describing its scope. Without clarification, the interpretation of the term 'accuracy' could vary widely between REs and/or Registered

Entities, fostering incongruities in CMEP monitoring activities. For example, ‘accuracy’ as currently stated could refer either to the comprehensiveness of the overall data set or the precision of each individual data point, but the administrative burden for each is very different.

The MRO NSRF continues to see overlapping areas within the new drafts (IRO-010-5/TOP-003-6 1.5.2 and 1.5.5, TOP-003-6 2.5.2 and 2.5.5) and CIP-012-1 as well as Project 2020-04. Secure data transfer resides within CIP-012 and incorporating it into IRO-010-5 and TOP-003-6 continues to raise the risk of double jeopardy between those standards and CIP-012 in cases of Real Time Monitoring and Real Time Assessment data. The SDT should also coordinate with the Project 2020-04 SDT to ensure no conflicted interpretation of the term “availability” is likely to arise.

MRO NSRF recommends the removal of IRO-010-5 1.4 and TOP-003-5 1.4 and 2.4, as it is unnecessary and too broad. The term “resolving conflicts” could relate to a host of issues outside of the intention of the SDT. The new draft standards already contain provisions to update and correct data and information via 1.5.2 and 2.5.2. The SDT’s white paper also used these as an example of the use of the conflict resolution process, making the publication of an additional conflict resolution process unnecessary. Such a requirement, as described in the Technical Rationales, increases the administrative burden of these standards, rather than lessening. To the extent that two entities require conflict resolution, that can and is done outside of a compliance requirement.

While “mutually agreeable” appears occasionally throughout the NERC Reliability Standards and is a generally understood term, the SDT’s White Paper interpretation of its use within the context of IRO-010-5 and TOP-003-6 increases the administrative burden, compliance responsibility, and data retention requirements related to these standards if documentation regarding collaboration with each entity must be maintained. Mutually Agreeable (page 10 of white paper): The repeated use of the term “mutual agreed upon” is intentional to facilitate collaboration between requestors and respondents in preparing the data specification to ensure the specification is feasible, reasonable, and sufficient. The retention of the word mutual for these requirements suggests that a data specification should be developed collaboratively, to address issues and concerns around the provision and protection of content of the respondent data can be addressed in the specification itself. As such, the MRO NSRF recommends the SDT clarify what administrative or evidence burden is intended by that term within the technical rationale.

Likes 1	Wike Jennie On Behalf of: John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry
---------	--

Dislikes 0	
------------	--

### Response

**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

**Answer**

**Document Name**

**Comment**

In the previous draft, the SDT agreed with many of our points in regards to inconsistencies with respect to IRO-010 R1 and R2 (low VRF) and R3 (medium VRF) as well as the VSL levels for elements 1.1 through 1.4 and indicated that these would be addressed in Draft 2. We would appreciate any clarifications as to why they seem not to have been addressed.

To adjust to the current draft and to correct an error in the comment, we re-iterate here our comments from the last draft.

Despite FERC having accepted the VRF for the previous version of this standard, the VRF for R1 (low) seems to us inconsistent with respect to the

VRF for R3 (medium). The requirement for an RC (in IRO-010 for example) to identify information essential to reliability (R1.1) cannot logically be less important than an entity's communication of that same information to the RC. Indeed, since an RC's obligation applies to potentially many entities in its Area, it is more impactful for the RC Area's reliability that the RC correctly identify the information needed to satisfy its own reliability obligations than for a single respondent to fail to communicate the information. The VRF for R1 should be moved to Medium or the VRF for R3 should be lowered to Low. Per the VRF and VSL justification document, this inconsistency does not respect Guideline 2.

A similar inconsistency is present for the proposed VSL. As proposed, the VSL for R3 attributes a lower VSL to any single violation of elements 1.1 through 1.4. Meanwhile, a failure to identify a single information per 1.1, 1.2 or 1.3 does not trigger the VSL for R1 which requires that at least two sub-requirements must be violated to qualify for VSL-low.

So, for example, a failure to report information asked for in the specification as per R1.1 or R1.2 or R1.3 is potentially a VRF-medium, VSL-low violation of R3, whereas the failure to identify that same information under R1 would be a VRF-low, VSL-none violation. Since the VSL is not even low, the latter is arguably not a violation at all.

We consider that an identification violation of R1.1, R1.2 or R1.3 individually should be at least as severe as a reporting violation of the same sub-requirements for a non-RC entity via R3. That is, a single identification violation of R1.1, R1.2 or R1.3 should be "lower". Or, the VSL text for R3 should be aligned with the VSL text of R1.

That said, the way R1.5 is written now, a failure to identify in R1.1, R1.2 and R1.3 may perhaps generally trigger a failure to correctly identify an associated administrative communication through in R1.5, thereby triggering a two-element failure and thus a VSL-moderate violation for a failure to identify. In the same way, the failure to communicate per R3 an information specified in R1.1 will likely also be a failure to respect the administrative communication means specified in R1.5, also "promoting" the VSL by one level.

Likes 0

Dislikes 0

### Response

**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1**

**Answer**

**Document Name**

**Comment**

We believe the updates made in this draft revision are in line with the SAR and clarify the requirements surrounding data specifications. Furthermore, we believe this revision provides needed clarity to the Violation Severity Levels by aligning them with the revised requirement language.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

### Response

**Nicolas Turcotte - Hydro-Quebec (HQ) - 1**

**Answer**

**Document Name**

**Comment**

In the previous draft, the SDT agreed with many of our points in regards to inconsistencies with respect to IRO-010 R1 and R2 (low VRF) and R3 (medium VRF) as well as the VSL levels for elements 1.1 through 1.4 and indicated that these would be addressed in Draft 2. We would appreciate any clarifications as to why they seem not to have been addressed.

To adjust to the current draft and to correct an error in the comment, we re-iterate here our comments from the last draft.

Despite FERC having accepted the VRF for the previous version of this standard, the VRF for R1 (low) seems to us inconsistent with respect to the VRF for R3 (medium). The requirement for an RC (in IRO-010 for example) to identify information essential to reliability (R1.1) cannot logically be less important than an entity’s communication of that same information to the RC. Indeed, since an RC’s obligation applies to potentially many entities in its Area, it is more impactful for the RC Area’s reliability that the RC correctly identify the information needed to satisfy its own reliability obligations than for a single respondent to fail to communicate the information. The VRF for R1 should be moved to Medium or the VRF for R3 should be lowered to Low. Per the VRF and VSL justification document, this inconsistency does not respect Guideline 2.

A similar inconsistency is present for the proposed VSL. As proposed, the VSL for R3 attributes a lower VSL to any single violation of elements 1.1 through 1.4. Meanwhile, a failure to identify a single information per 1.1, 1.2 or 1.3 does not trigger the VSL for R1 which requires that at least two sub-requirements must be violated to qualify for VSL-low.

So, for example, a failure to report information asked for in the specification as per R1.1 or R1.2 or R1.3 is potentially a VRF-medium, VSL-low violation of R3, whereas the failure to identify that same information under R1 would be a VRF-low, VSL-none violation. Since the VSL is not even low, the latter is arguably not a violation at all.

We consider that an identification violation of R1.1, R1.2 or R1.3 individually should be at least as severe as a reporting violation of the same sub-requirements for a non-RC entity via R3. That is, a single identification violation of R1.1, R1.2 or R1.3 should be “lower”. Or, the VSL text for R3 should be aligned with the VSL text of R1.

That said, the way R1.5 is written now, a failure to identify in R1.1, R1.2 and R1.3 may perhaps generally trigger a failure to correctly identify an associated administrative communication through in R1.5, thereby triggering a two-element failure and thus a VSL-moderate violation for a failure to identify. In the same way, the failure to communicate per R3 an information specified in R1.1 will likely also be a failure to respect the administrative communication means specified in R1.5, also “promoting” the VSL by one level.

Likes 0

Dislikes 0

**Response**

**Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster**

**Answer**

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the MRO NSRF for question #4.

Likes 0

Dislikes 0

**Response**

**Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies**

**Answer**

**Document Name**

**Comment**

RF thanks the Standard Drafting Team for its consideration of Draft 1 comments and appreciates the opportunity to comment the proposed Draft 2 standard revisions.

Likes 0

Dislikes 0

**Response**

**Donna Wood - Tri-State G and T Association, Inc. - 1**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Ruchi Shah - AES - AES Corporation - 5**

**Answer**

**Document Name**

**Comment**

No additional comments here.

Likes 0



Dislikes 0

**Response**

**Daniel Mason - Portland General Electric Co. - 6, Group Name** Portland General Electric Co.

**Answer**

**Document Name**

**Comment**

Portland General Electric Company does not believe the proposed changes to IRO-010 and TOP-003 provide meaningful improvement on the currently enforceable version of these standards. Given the number of other Standard Development projects responsible entities are currently responding to, IRO-010 and TOP-003 should not be modified at this time.

Likes 0

Dislikes 0

**Response**

**Diana Torres - Imperial Irrigation District - 6**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name** FE Voter

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF**

**Answer**

**Document Name**

**Comment**

The NAGF has no additional comments.

Likes 0

Dislikes 0

**Response**

**Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company**

**Answer**

**Document Name**

**Comment**

Southern Company does not have any further comments.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

BPA appreciates the SDT's explanation that they tried to focus on process. However, process over results is an ineffective way to ensure reliability.

Likes 0

Dislikes 0

**Response**

**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Donald Lock - Talen Generation, LLC - 5**

**Answer**

**Document Name**

**Comment**

No additional comments

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**Answer**

**Document Name**

**Comment**

While outside the scope of the current SAR, AECl agrees that TOP-003 R1.3 and its subparts as well as IRO -010-3 R1.3 and its subparts be retired once the recent obligations associated with Project 2021-07 (Extreme Cold Weather) have become enforceable.

Likes 0

Dislikes 0

**Response**

**Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer**

**Document Name**

**Comment**

AZPS does not have any additional comments for the SDT at this time.

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer**

**Document Name**

**Comment**

No comments

Likes 0

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer**

**Document Name**

**Comment**

While outside the scope of the current SAR, AEP once again recommends that TOP-003 R1.3 and its subparts be deleted once the recent obligations associated with Project 2021-07 (Extreme Cold Weather) have become enforceable. The most recent revisions in Project 2021-07 were developed in the spirit that the standard be flexible and that its obligations be less prescriptive in nature. We believe this same approach should also be taken for TOP-003 in Project 2021-06 as well.

Likes 1	Associated Electric Cooperative, Inc., 3, Bennett Todd
---------	--

Dislikes 0	
------------	--

**Response**

**Glen Pruitt - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD Voters**

**Answer**

**Document Name**

**Comment**

No Comments

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**