

Implementation Plan for Project 2010-17: Definition of BES

Prerequisite Approvals

There are no other Reliability Standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before this project can be implemented. However, this definition relies heavily on the fact that an approved exception process exists in the NERC Rules of Procedure.

Effective Dates

This definition shall become effective on the first day of the second calendar quarter after applicable regulatory approval. In those jurisdictions where no regulatory approval is required the definition shall go into effect on the first day of the second calendar quarter after Board of Trustees adoption.

Compliance obligations for all newly identified Elements included by the definition shall begin 24 months after the applicable effective date of the definition.

The SDT realizes that Order 743 suggested a maximum of 18 months for implementation of a revised definition of the BES. The 24 month period cited here is based on the various rehearing requests filed by entities expected to be affected by the revised definition. Thus, the SDT believes that this is a more realistic timeframe in which to effect any changes.

The SDT believes that the timeframe shown is needed to:

- Effectively produce reasonable transition plans – As shown in Order 743, part of the overall process of revising the definition of BES is for the ERO and Regional Entities to develop transition plans on a region by region basis to accommodate any changes needed in those regions due to the revised definition. The transition plans will include any actions necessary for entities to achieve compliance on any issues brought about by the revised definition.
- Submit any necessary registration changes – While Order 743 states that a revised definition should provide clarity and not necessarily require major changes to registration; it is possible that the revised definition may cause some registration changes. Entities will need time to submit their changes and for those changes to work their way through the process.
- File for exceptions – The revised definition does not exist in a vacuum. There is a corresponding process for entities to request exceptions for specific equipment or configurations. This process will be defined in the NERC Rules of Procedure and will involve individual entities or the Regional Entities having to make a technical case to justify the exception. This process will take some time to complete and it would be expected that there will be an initial backlog of cases to process.
- Provide training – Entities will need to train their operators and personnel on changes to their operations brought about by the revised definition.

The existing definition of BES shall be retired at midnight of the day immediately prior to the effective date of the new definition of BES in the particular jurisdiction in which the new definition is becoming effective.