

Project 2006-06, Reliability Coordination Scope of Work Assigned to the Reliability Coordination Standard Drafting Team

Purpose

To ensure that the reliability-related requirements applicable to the Reliability Coordinator are clear, measurable, unique and enforceable; and to ensure that this set of requirements is sufficient to maintain reliability of the Bulk Electric System.

Brief Description

Most of the requirements in this set of standards were translated from Operating Policies as part of the Version 0 process. There have been suggestions for improving these requirements, and the drafting team will consider comments submitted by stakeholders, drafting teams and FERC in determining what changes should be proposed to stakeholders.

The drafting team will review all of the requirements in this set of standards and make a determination, with stakeholders, on whether to:

- Modify the requirement to improve its clarity and measurability while removing ambiguity
- Move the requirement (into another SAR or Standard or to the certification process or standards)
- Eliminate the requirement (either because it is redundant or because it doesn't support bulk power system reliability).
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Detailed Description

The drafting team will review all of the requirements in the following set of standards:

COM-001 — Telecommunications

COM-002 — Communications and Coordination

IRO-001 — Reliability Coordination – Responsibilities and Authorities

IRO-002 — Reliability Coordination – Facilities

IRO-005 — Reliability Coordination – Current Day Operations

IRO-014 — Procedures to Support Coordination between Reliability Coordinators

IRO-015 — Notifications and Information Exchange Between Reliability Coordinators

IRO-016 — Coordination of Real-time Activities between Reliability Coordinators

PER-004 — Reliability Coordination – Staffing

PRC-001 — System Protection Coordination

For each existing requirement, the drafting team will work with stakeholders and:

- Eliminate redundancy in the requirements.
- Identify requirements that should be moved into other SARs
- Eliminate requirements that do not support bulk power system reliability
- Transfer requirements that need to be in place before an entity begins operation as an RC to certification.
- Improve clarity of, improve measurability of, and remove ambiguity from the requirement

The standard drafting team will also:

- Coordinate with the drafting teams working on the SAR and standards for Transmission Operator and Balancing Authority standards (Project 2007-06).
- Consider comments received during the initial development of this set of standards and other comments received from ERO regulatory authorities and stakeholders (Attachment 1)
- Bring the standards into conformance with the latest version of the Reliability Standards Development Procedure and the ERO Rules of Procedure. (Attachment 2)

This review of the set of identified standards will satisfy the standards procedure requirement to review each approved standard at least once every five years.

Attachment 1

The drafting team will assist stakeholders in considering these comments in determining what changes to make to the standards:

COM-001-0 Telecommunications

FERC Order 693

- Include generator operators and distribution provider as applicable entities and include requirements for their telecommunications. **GOP and DP were added to Applicability and a new requirement was added to the standard.**
- Include requirements for telecommunication facilities for use during normal and emergency conditions that reflect the roles of the applicable entities and their impact on reliable operation. **The RC SDT contends that telecommunications facility requirements are low level facilitating requirements that are more appropriately and inherently monitored under various higher level performance-based reliability requirements for each entity throughout the body of standards. (please see Implementation Plan for COM-001 for examples).**
- Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions. **The RC SDT contends that telecommunications facility requirements are low level facilitating requirements that are more appropriately and inherently monitored under various higher level performance-based reliability requirements for each entity throughout the body of standards. (please see Implementation Plan for COM-001 for examples).**

V0 Industry Comments

- Many players missing. **The RC SDT has added the GOP and DP to the standard.**
- Apply R1 to all but smallest entities. **The RC SDT proposes retiring R1.**

Violation Risk Factor Drafting Team Comments

- R6 – administrative requirement **The RC SDT proposes retiring this requirement as it is administrative in nature.**

COM-002-1 Communications and Coordination

FERC Order 693

- Include a Requirement for the reliability coordinator to assess and approve actions that have impacts beyond the area views of transmission operators or balancing authorities; **This requirement is covered in proposed IRO-014-2, R1.**
- Include distribution providers as applicable entities; **The proposed revisions do not include the DP entity because they are not applicable.**
- Require tightened communications protocols, especially for communications during alerts and emergencies. **This is to be covered in new COM-003 standard.**

IRO-001-0 Reliability Coordination – Responsibilities and Authorities

FERC Order 693

- o Reflect the process set forth in the NERC Rules of Procedures; and
- o Eliminate the regional reliability organization as an applicable entity. **Done**

Regional Fill-in-the-Blank Team Comments

- o Remove ", sub-region, or interregional coordinating group" from R1. **Proposing to retire the requirement.**
- o Consider removing "Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another." from the Purpose section of the standard. **Done**

V0 Industry Comments

- o Inability to perform needs to be communicated **Included in redline R9**
- o What is meant by 'interest of other entity'? **Proposing to retire the requirement.**

Violation Risk Factor Drafting Team Comments

- o R6 - Since the RC must be NERC certified, it stands to reason that anyone performing RC tasks should be certified. However, since the RC still retains the accountability for actions, and requirement 4 handles the agreements, this requirement is a medium risk. **Proposing to retire the requirement.**

IRO-002-0 Reliability Coordination – Facilities

FERC Order 693

- o Require a minimum set of tools that should be made available to reliability coordinators. **The development of a minimum set of tools should be addressed through the work of the Real-Time Tools Best Practices Task Force. Their charge was to develop a list of tools required to perform real time operations functions and submit SARs based on their work. As requirements for these tools are developed, appropriate standards projects will be initiated to incorporate the tools within the NERC Organization Registration and Certification Process, and the applicable reliability standards. The RC SDT submits that this directive be addressed in that effort. This action is accommodated by the Standards Development Work Plan.**

V0 Industry Comments **Proposing to retire these requirements.**

- o R5 – define synchronized information system
- o R7 – define 'adequate' tools and 'wide-area'
- o Words such as 'easily understood' and 'particular emphasis' need to be tightened

IRO-005-1 Reliability Coordination – Current Day Operations

FERC Order 693

- o Measures and Levels of Non-Compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency and causes of the violations and whether these occur during normal or contingency conditions. IROLs are being handled in new IRO standards IOR-008 thru 010.
- o Conduct a survey on IROL practices and experiences; the Commission may propose further modifications to IRO-005-1 based on the survey results. The RC SDT is unaware whether any survey activities are being performed a this time.

V0 Industry Comments

- o R10, 11 & 12 – RA not empowered to do this. Proposing to retire these as they are redundant with other requirements (see Implementation plan)

IRO-014-1 and IRO-015-1

There were no directives from FERC Order 693 nor were there any comments from V0.

IRO-016-1 Coordination of Real-Time Activities Between Reliability Coordinators

Violation Risk Factors Drafting Team Comments

- o R1.2.1 & R2 – ambiguous **All of R1 has been moved into IRO-014 and rewritten for clarity**

PER-004-0 Reliability Coordination – Staffing **This standard is being revised in another SAR**

FERC Order 693

- o Include formal training requirements for reliability coordinators similar to those addressed under the personnel training Reliability Standard PER-002-0;
- o Include requirements pertaining to personnel credentials for reliability coordinators similar to those in PER-003-0
- o Consider the suggestions of FirstEnergy and Xcel:
1413. FirstEnergy seeks revisions to the terms “shall have a comprehensive understanding” and “shall have extensive knowledge.” It states that it will be difficult for entities to demonstrate compliance with these terms. In addition, FirstEnergy suggests that the reliability coordinator staffing requirements should be located in the IRO Reliability Standards.
1414. Xcel states that emergency training requirements should be expressed in hour increments rather than days to allow for flexibility in scheduling training and coordinating with rotating shift schedules.

V0 Industry Comments

- o Calendar year timing increment
- o Other training needs to be defined

PRC-001-0 System Protection Coordination **This standard is being revised in another SAR**

FERC Order 693

- o Correct the references for Requirements
- o Include a requirement that upon the detection of failures in relays or protection system elements on the Bulk-Power System that threaten reliable operation, relevant transmission operators must be informed promptly, but within a specified period of time whereas generator operators must also promptly inform their transmission operators
- o Clarify that, after being informed of failures in relays or protection system elements that threaten reliability of the Bulk-Power System, transmission operators must carry out corrective control actions, i.e., return the system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes after they receive notice of the failure

V0 Industry Comments

- o Effects on reliability may not be known
- o Consistent terminology as to neighbor vs. affected
- o Not all criteria moved over from policies