

Standard Authorization Request (SAR) Form

Complete and please email this form, with attachment(s) to: sarcomm@nerc.net

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information	
SAR Title:	Standards Alignment with Registration
Date Submitted:	
SAR Requester	
Name:	NERC Standards Staff Revised by Project 2017-07 Standards Alignment with Registration SAR Drafting Team Stephen Wendling, Chair
Organization:	NERC American Transmission Company
Telephone:	(608) 877-8232
Email:	swendling@atcllc.com
SAR Type (Check as many as apply)	
<input type="checkbox"/> New Standard <input checked="" type="checkbox"/> Revision to Existing Standard <input type="checkbox"/> Add, Modify or Retire a Glossary Term <input type="checkbox"/> Withdraw/retire an Existing Standard	<input type="checkbox"/> Imminent Action/ Confidential Issue (SPM Section 10) <input type="checkbox"/> Variance development or revision <input type="checkbox"/> Other (Please specify)
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)	
<input checked="" type="checkbox"/> Regulatory Initiation <input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified <input type="checkbox"/> Reliability Standard Development Plan	<input type="checkbox"/> NERC Standing Committee Identified <input type="checkbox"/> Enhanced Periodic Review Initiated <input checked="" type="checkbox"/> Industry Stakeholder Identified
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):	
This project will align the Reliability Standards <u>that are impacted by</u> <u>with the outcome of</u> the Risk-Based Registration (RBR) initiative.	
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):	
This project aligns <u>would modify Reliability Standards</u> <u>to be consistent</u> with the FERC-approved <u>changes to registration as part of the</u> RBR initiative.	
Project Scope (Define the parameters of the proposed project):	
This project will review and align Reliability standards <u>Standards</u> impacted by the RBR initiative.	
Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification ¹ which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g. research paper) to guide development of the Standard or definition):	
This project will formally address any remaining edits to the Reliability standards <u>Standards</u> that are needed to align the existing standards with the RBR initiatives. The edits include updates to the BAL,	

¹ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

Requested information

CIP, FAC, INT, IRO, MOD, NUC, and TOP family of standards to remove the references to Purchasing-Selling Entities (PSEs) and Interchange Authorities (IAs); references to the Load-Serving Entity (LSEs) will be removed or replaced by either the Distribution Provider (DP), ~~or~~ the Balancing Authority (BA), or the appropriate applicable entity. Additionally, the project will include adding Underfrequency Load Shedding (UFLS)-only DPs to the Applicability Section of PRC-005 and PRC-006; and review the Applicability sections of PRC-004 PRC-005 and PRC-008 will replace and revise, as appropriate, to add UFLS-only DPs.~~the distribution provider with the Underfrequency Load Shedding (UFLS)-only DPs.~~

The clean-up effort of the standards can be categorized into the following:

1. Modifications to existing standards where the removal of the retired function may need replacement by another function. Specifically, For instance, Reliability Standard MOD-032-1 specifies certain data from LSEs that may need to be provided by other functional entities going forward. ~~A SAR has been submitted to modify the MOD standards, and it would be posted with the Alignment with Registration SAR.~~
2. Modifications where the applicable entity and references may be removed. These updates may be able to follow a similar process to the Paragraph 81 initiatives where standards are redlined and posted for industry comment and ballot. A majority of the edits would simply remove deregistered functional entities and their applicable requirements/references. The impacted standards include the BAL, CIP, IRO, and TOP family of standards. Additionally PRC-005-1.1b and PRC-006-003 will be updated to replace-add distribution providers with the more limited-UFLS-only DP to the Applicability Sections and a review of the Applicability Sections of PRC-004-5(i) and PRC-008-0 to add, as appropriate, UFLS-only DP to align with the post-RBR registration impacts.
3. Initiatives that can address RBR updates through the periodic review process. This would include the INT-004-3.1 and NUC-001-3 standards. ~~In other words, rather than the Project 2017-07 making the revisions immediately, this~~ the SDT could coordinate with information would be provided to the periodic review teams currently reviewing INT-004-3.1 and NUC-001-3 so that any changes resulting from those periodic reviews, if any, may be proposed at the same time after completion of each periodic review.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

No additional costs outside of the time and resources needed to serve on the SAR and ~~SC Standard Drafting T~~eam.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g. Dispersed Generation Resources):

~~NA~~None

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g. Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Requested information
Since LSE is being <u>removed or</u> replaced by either a <u>the</u> Distribution Provider <u>(DP)</u> , or <u>the</u> Balancing Authority <u>(BA)</u> , <u>or the appropriate Applicable Entity</u> for the standards that need to be updated, those entities will like <u>likely</u> be best suited for the MOD and PRC updates.
Do you know of any consensus building activities ² in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
NA <u>None</u>
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so which standard(s) or project number(s)?
A separate SAR on the MOD standards was recently received that would be addressed by this project. <u>None</u>
Are there alternatives (e.g. guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

Reliability Principles	
Does this proposed standard development project support at least one of the following Reliability Principles (Reliability Interface Principles)? Please check all those that apply.	
<input checked="" type="checkbox"/> <input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input checked="" type="checkbox"/> <input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Market Interface Principles	
Does the proposed standard development project comply with all of the following Market Interface Principles ?	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes

² Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Market Interface Principles	
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

Identified Existing or Potential Regional or Interconnection Variances	
Region(s)/ Interconnection	Explanation
e.g. <u>NPCC and SERC</u>	<u>UFLS-only DP will be added to the Applicability Section of PRC-006 and will create a variance of the following two Regional Standards:</u> <u>PRC-006-NPCC-1</u> <u>PRC-006-SERC-01</u> <u>PRC-006-SERC-02</u>

For Use by NERC Only

SAR Status Tracking (Check off as appropriate)	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff <input type="checkbox"/> Draft SAR presented to SC for acceptance <input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> Final SAR endorsed by the SC <input type="checkbox"/> SAR assigned a Standards Project by NERC <input type="checkbox"/> SAR denied or proposed as Guidance document

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January X, 2017	Standards Information Staff	Revised