

Comment Report

Project Name: 2020 Periodic Review Standing Review Team - Standards Grading
Comment Period Start Date: 3/22/2021
Comment Period End Date: 5/5/2021
Associated Ballots:

There were 11 sets of responses, including comments from approximately 72 different people from approximately 55 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. For [COM-001-3](#) (R12 and R13 only), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
2. For [IRO-001-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
3. For [IRO-002-6](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
4. For [IRO-008-2](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
5. For [IRO-010-2](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
6. For [IRO-014-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
7. For [IRO-017-1](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
8. For [IRO-018-1\(i\)](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
9. For [TOP-001-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
10. For [TOP-002-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
11. For [TOP-003-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
12. For [TOP-010-1\(i\)](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

13. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

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	1,3,5	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
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	4	MRO
					Fred Meyer	Algonquin Power Co.	1	MRO
					Jamie Monette	Allele - Minnesota Power, Inc.	1	MRO
					Jodi Jensen	Western Area Power Administration - Upper Great Plains East (WAPA)	1,6	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc.	2	MRO
LaTroy Brumfield	American Transmission Company, LLC	1	MRO					

					Bryan Sherraw	Kansas City Board Of Public Utilities	1	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1,3,5	MRO
					Joe DePoorter	Madison Gas and Electric	4	MRO
					David Heins	Omaha Public Power District	1,3,5,6	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Southwest Power Pool, Inc. (RTO)	Kimberly Van Brimer	2	MRO,WECC	Southwest Power Pool Standards Review Group (SSRG)	Kim Van Brimer	SPP	2	MRO
					Jim Williams	SPP	2	MRO
					Matt Harward	SPP	2	MRO
					Shannon Mickens	SPP	2	MRO
					Alan Wahlstrom	SPP	2	MRO
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC

David Burke	Orange & Rockland Utilities	3	NPCC
Helen Lainis	IESO	2	NPCC
David Kiguel	Independent	7	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC
Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
Vijay Puran	NYSPPS	6	NPCC

ALAN ADAMSON	New York State Reliability Council	10	NPCC
Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
Brian Robinson	Utility Services	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Jim Grant	NYISO	2	NPCC
John Pearson	ISONE	2	NPCC
John Hastings	National Grid USA	1	NPCC
Michael Jones	National Grid USA	1	NPCC
Nicolas Turcotte	Hydro-Quebec TransEnergie	1	NPCC
Chantal Mazza	Hydro-Quebec	2	NPCC
Michele Tondalo	United Illuminating Co.	1	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

1. For [COM-001-3](#) (R12 and R13 only), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer No

Document Name

Comment

Did the SRT consider (in response to Q13 in the Resources tab) the benefits vs. administrative costs with having a specific requirement for such a basic piece of business infrastructure given this capability has to exist to meet many other requirements in the IRO and TOP standards. For example, various requirements related to issuing/receiving and complying with Operating Instructions. The IRO-002 R1 and TOP-001 R19 requirements were retired in the SER Project 2018-03 using similar justifications.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer No

Document Name

Comment

Q1. These requirements are redundant to R1, R2, R3 and R4 and can be combined or eliminated.

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer No

Document Name

Comment

SPP Standards Review Group (SSRG) offers that R12 is specific to internal Interpersonal communication capabilities, for example Control Center to Control Center within an entities primary and back-up.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name

Comment

Did the SRT consider the benefits vs. administrative costs with having a specific requirement for such a basic piece of business infrastructure given this capability has to exist to meet many other requirements in the IRO and TOP standards. For example, various requirements related to issuing/receiving and complying with Operating Instructions. The IRO-002 R1 and TOP-001 R19 requirements were retired in the SER Project 2018-03 using similar justifications. This relates to Q13 in the Resources tab.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer No

Document Name

Comment

In reference to Q1 of the Standards Grading Tool: Requirements R12 and R13 could be consolidated within Requirements R1, R3, R5, R7, and R8 as appropriate.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response	
Scott McGough - Georgia System Operations Corporation - 3,4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
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 Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. For [IRO-001-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Scott McGough - Georgia System Operations Corporation - 3,4

Answer No

Document Name

Comment

Relative to R2, C4, comments noting the ambiguity of timing are not supported as the time frame for complying with an Operating Instruction is contained in the issued Operating Instruction.

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer No

Document Name

Comment

The SPP Standards Review Group (SSRG) recommends defining and/or providing clarity around “shall act” and “direct actions” specific to the RC.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer No

Document Name

Comment

C4/Q11: "shall act" in requirement is vague and does not have a clear action the RC is supporting.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that R1 is not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This requirement should be revised to align with the results-based framework defining a clear measureable reliability objective.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that R1 is not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This requirement should be revised to align with the results-based framework defining a clear measureable reliability objective.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
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 Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

3. For [IRO-002-6](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer No

Document Name

Comment

For Requirements R2-R4, in reference to Q5: Based on the Purpose statement of IRO-002-6, the Requirements could be moved to other standards, as follows:

- R2 and R3 could be consolidated to IRO-018 to establish the requirements for Real-time monitoring and analysis capabilities
- R4 could be consolidated in IRO-001 as part of establishing the Reliability Coordinators responsibilities.

For Requirements R5 and R6 in reference to Q1, Q11: These Requirements could be consolidated under IRO-018, in support of the establishment of Real-time Monitoring and Real-time Assessment capabilities in accordance with the purpose statement of the standard.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer No

Document Name

Comment

“Q4: Is it clear when the action needs to be taken within the standard” – For R3, CAISO would grade this as “No”. Required testing every 90 days implies quarterly but in order to be compliant, 5 tests per year are required.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that R2 is unclear on what is needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This requirement should be revised to align with the results-based framework defining a clear measureable reliability objective.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

The NSRF agrees with members of the SRT that R2 is unclear on what is needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This requirement should be revised to align with the results-based framework defining a clear measureable reliability objective

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

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 Regional Standards Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. For [IRO-008-2](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Jamie Johnson - California ISO - 2

Answer No

Document Name

Comment

"Q8: Can it be practically implemented and Q11: Is the requirement language clear and unambiguous" – For R6 CAISO would grade this as "No" since the definition of "impacted entities" related to notification requirements once SOLs have been mitigated is unclear and this type of requirement can not be practically implemented.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer No

Document Name

Comment

For Requirement R5, in reference to C4, Q8: The requirement implies that the RC will (immediately) notify the TOP if an expected condition results in an SOL exceedance. This is possible but not practical as a violation may appear in RTCA for only one assessment cycle and then clear (due to numerical solution convergence issues, switching, generation redispatch, etc.).

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that several requirements in IRO-008 are unclear on what is actually needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining a clear

measurable set of reliability objectives. The clarifications for OPA, RTA and RTM should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer

Yes

Document Name

Comment

I agree with members of the SRT that several requirements in IRO-008 are unclear on what is actually needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining a clear measurable set of reliability objectives. The clarifications for OPA, RTA and RTM should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

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 Regional Standards Committee

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

5. For [IRO-010-2](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer No

Document Name

Comment

Q11: Real time monitoring is ambiguous and should be defined.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with the OC member of the SRT on the need for clarity in R1 regarding RTM. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with the OC member of the SRT on the need for clarity in R1 regarding RTM. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name	
Comment	
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 Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

6. For [IRO-014-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that R7 is unclear on what is actually needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This requirement should be revised to align with the results-based framework defining a clear measureable reliability objective.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that R7 is unclear on what is actually needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This requirement should be revised to align with the results-based framework defining a clear measureable reliability objective.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer Yes

Document Name

Comment

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 Regional Standards Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

7. For [IRO-017-1](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer No

Document Name

Comment

For Requirement R3, in reference to Q1: This requirement should exist in the TPL Standards. The Guideline and Technical Basis section of IRO-017-1 states that such coordination should take place in the TPL standards and to support that position, the SDT has created an item in a draft SAR for TPL-001-4 that would revise Requirement R8 to make the Reliability Coordinator an explicit party in the review process described there.

For Requirement R4, in reference to Q1: TOP(s) should also be part of discussion to jointly develop solutions.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that R3 and R4 are unclear on what is actually needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measurable reliability objectives. I also believe R3 and R4 should be moved to the TPL-001 standards to consolidate activities associated with the annual Planning Assessment.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that R3 and R4 are unclear on what is actually needed for reliability. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measureable reliability objectives. I also believe R3 and R4 should be moved to the TPL-001 standards to consolidate activities associated with the annual Planning Assessment.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response	
Scott McGough - Georgia System Operations Corporation - 3,4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
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 Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

8. For [IRO-018-1\(j\)](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with the RE member of the SRT on the need for clarity in R1 and R3 regarding RTM. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with the RE member on the SRT on the need for clarity in R1 and R3 regarding RTM. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer Yes

Document Name

Comment

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 Regional Standards Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

9. For [TOP-001-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Scott McGough - Georgia System Operations Corporation - 3,4

Answer No

Document Name

Comment

Relative to R21, C3, GSOC notes that TOPs must initiate corrective action soon after an unsuccessful test. Accordingly, the value of a TOP notifying the RC of an unsuccessful test of backup functionality is extremely low while the administrative and compliance burden for both parties would outweigh any, derived value.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer No

Document Name

Comment

"Q4: Is it clear when the action needs to be taken within the standard" – For R21, CAISO would grade this as "No". Required testing every 90 days implies quarterly but in order to be compliant, 5 tests per year are required.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that several requirements in TOP-001 are not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measureable reliability objectives.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that several requirements in TOP-001 are not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measurable reliability objectives.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer	Yes
Document Name	
Comment	
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 Regional Standards Committee

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

10. For [TOP-002-4](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Scott McGough - Georgia System Operations Corporation - 3,4

Answer No

Document Name

Comment

Relative to R6, C4, GSOC respectfully suggests that the time frame for providing next-day data is implied in the requirement.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that several requirements in TOP-002 are not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measureable reliability objectives.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that several requirements in TOP-002 are not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measureable reliability objectives.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

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 Regional Standards Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

11. For [TOP-003-3](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with SRT members on the need for clarifying revisions in this standard. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measurable reliability objectives. This should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with SRT members on the need for clarifying revisions in this standard. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. These requirements should be revised to align with the results-based framework defining clear measurable reliability objectives. This should be addressed by the Operational Data Exchange Simplification SAR from the SER Phase 2 team that is currently on the list of upcoming projects.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Scott McGough - Georgia System Operations Corporation - 3,4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	

Comment

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 Regional Standards Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

12. For [TOP-010-1\(i\)](#), do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with members of the SRT that the requirements are not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This standard should be revised to align with the results-based framework defining clear measureable reliability objectives.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer Yes

Document Name

Comment

I agree with members of the SRT that the requirements are not clear and therefore difficult to measure. This relates to Q4, Q7, Q8 and Q11 in the Resources tab. This standard should be revised to align with the results-based framework defining clear measureable reliability objectives.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

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 Regional Standards Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

13. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer

Document Name

Comment

Many of the recommendations from the SRT point to the need for better alignment with the results-based framework in the standards. The SER Phase 2 team has provided recommendations that could assist in that effort. Therefore, the SRT should consider making a recommendation to update the standards once the standards template and drafting team reference manual have been enhanced by the Standards Committee Process Subcommittee in response to the SER recommendations.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Document Name

Comment

All grading of standards applicable to Black Hills Corporation were reviewed and approved.

Likes 0

Dislikes 0

Response

Kimberly Van Brimer - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name Southwest Power Pool Standards Review Group (SSRG)

Answer

Document Name

Comment

The SPP Standards Review Group (SSRG) suggests that because the OC and PC has been replaced by the Reliability and Security Technical Committee (RSTC), the language of the Standard Authorization Requests (SARs) in the Background Information, and the associated FAQ document, PR Template, and NERC Project Page should be modified to include the RSTC instead of the OC and the PC.

In reference to the PR Template, the SSRG offers the following comments:

Compliance Application Notices (CANs) are no longer used, but there have been SARs that have been considered and rejected by the SC that could indicate some need for clarifications.

The Reliability Issues Steering Committee (RISC) is now working with the RSTC to continuously assess and monitor how standards are addressing reliability risks. The PR Template should ask if the RISC has identified a need to update a requirement. Is there a requirement the RISC needs to be aware of that is lacking?

Finally, Q5 re: Consistency should be expanded to ask whether there is duplication or redundancy with other requirements. NERC leadership has committed to not let new or revised standards duplicate what the Standards Efficiency Review (SER) project eliminated.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

Many of the recommendations from the SRT point to the need for better alignment with the results-based framework in the standards. The SER Phase 2 team has provided recommendations that could assist in that effort. Therefore, the SRT should consider making a recommendation to update the standards once the standards template and drafting team reference manual have been enhanced by the Standards Committee Process Subcommittee in response to the SER recommendations.

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 Regional Standards Committee

Answer

Document Name

Comment

Data/Evidence retention:

Each Registered Entity shall retain its dated, current, in force, documented evidence for all Requirements and all Measurement as well as any documents in force since the last compliance audit.

Likes 0

Dislikes 0

Response