

Comment Report

Project Name: 2021-06 Modifications to IRO-010 and TOP-003 | Standard Authorization Request (Second Posting)
Comment Period Start Date: 1/11/2022
Comment Period End Date: 2/9/2022
Associated Ballots:

There were 33 sets of responses, including comments from approximately 122 different people from approximately 91 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Do you agree with the redline modifications made to the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.**
- 2. Provide any additional comments for the drafting team 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	1,3,5	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
Midcontinent ISO, Inc.	Bobbi Welch	2	MRO,RF,SERC	ISO/RTO Council Standards Review Committee 2021-06 Modifications to IRO-010_TOP-003 SAR	Ali Miremadi	CAISO	2	WECC
					Dana Showalter	ERCOT	2	Texas RE
					Helen Lainis	IESO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Bobbi Welch	MISO	2	RF
					Greg Campoli	NYISO	2	NPCC
					Michael Del Viscio	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Susan Sosbe	Wabash Valley Power Association	3	RF
					Jennifer Bray	Arizona Electric Power Cooperative, Inc.	1	WECC

					Scott Brame	NC Electric Membership Corporation	3,4,5	SERC
					Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
DTE Energy - Detroit Edison Company	Karie Barczak	3,5		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Patricia Ireland	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
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	3,5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	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 Sherrow	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
					David Heins	Omaha Public Power District	1,3,5,6	MRO
					George Brown	Acciona Energy North America	5	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
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Tricia Bynum	FirstEnergy - FirstEnergy Corporation	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,NPCC,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
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					James Howell	Southern Company - Southern	5	SERC

						Company Generation		
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Gerry Dunbar	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	3	NPCC					

	Edison Co. of New York		
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
Nicolas Turcotte	Hydro-Qu?bec 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
John Hastings	National Grid	3	NPCC

					Michael Jones	National Grid USA	1	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Matt Harward	Southwest Power Pool Inc.	2	MRO
					Charles Cates	Southwest Power Pool Inc.	2	MRO
					Mason Favazza	Southwest Power Pool Inc.	2	MRO
					Melissa Rinehart	Southwest Power Pool Inc.	2	MRO
					Zack Sharp	Southwest Power Pool Inc.	2	MRO
					Brent Springfield	Southwest Power Pool Inc.	2	MRO
					Jim Williams	Southwest Power Pool Inc.	2	MRO
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC

1. Do you agree with the redline modifications made to the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Lindsey Mannion - ReliabilityFirst - 10

Answer No

Document Name

Comment

While the redline modifications to the SAR do clarify that main intention of the proposed project is to address perceived excessive data retention requirements, the RF SAR review team still does not support implementation of the project. We therefore disagree with both the redline modifications and the previously posted SAR.

The SAR indicates that “as written the standards may create a zero-defect expectation for each Registered Entity receiving a data specification to demonstrate perfect performance on every item in the data specification for an entire audit period.” We note that the existing data retention period is 90 calendar days for both TOP-003-4 R5 and IRO-010-3 R3, and that under the present standards it would be unreasonable for any Compliance Enforcement Authority to expect retention of the full data set needed to meet the data specification for “an entire audit period.”

We also note that the applicable measures for these requirements list “attestations of receiving entities” as an example of evidence that an entity has satisfied a data specification, which provides entities the opportunity to demonstrate compliance without maintaining or providing records of the transmission of individual data points. The inclusion of third-party attestations in the measures of these requirements already allows entities to obtain the support of their TOP, BA, and/or RC to implement an exception-driven approach to demonstrating compliance.

For these reasons, we deem revisions to the existing requirements unnecessary.

Additionally, the SAR indicates that a secondary purpose is to evaluate other data exchange requirements for redundancy and possibly to remove redundant requirements (considering them rolled them into the TOP-003 and IRO-010 data specifications). We note that the existing VRF is Medium for IRO-010-3 R3 and TOP-003-4 R5, while some of the requirements referenced as potentially redundant under Detailed Description have an existing VRF of High. We caution against considering rolling in stand-alone High VRF requirements into a requirement with an existing VRF of Medium, else the Violation Risk Factor for satisfying the obligations of the TOP-003 and IRO-010 data specifications will need to be increased to High.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation observes that this project is based on proposed modifications to two standards that have not even become effective yet. Reclamation recommends the proposed modifications be incorporated into other proposed or pending standards development projects so as to reduce the amount of

churn among standard versions. For example, the efforts proposed in the SAR could be combined with project 2021-07, 2021-02, 2021-01, and/or 2020-06.

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 No

Document Name

Comment

Southern Company does not agree. The proposal to attempt to specify or determine the necessity of data that can be requested for reliability for all entities and all regions will not resolve the compliance issues the SAR is intending to address.

Making this standard more prescriptive may create difficulties in the RC/TOP/BAs ability to quickly react to changing system conditions, which might require additional information from providers. This has the potential to create a reliability concern.

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 SAR

Answer No

Document Name

Comment

The ISO/RTO Council Standards Review Committee (IRC SRC) is concerned with the overlap between this SAR and the Cold Weather SAR, as both projects are seeking to modify IRO-010 and TOP-003 concurrently, which is a difficult process to manage. The IRC SRC encourages NERC to consider whether there may be other approaches to resolve the zero defect, confidentiality, and dispute resolution issues without changing the standards, obviating the need for this project. For example, establish technical rationale / compliance guidance for the zero defect and confidentiality issues or modify NERC Rules of Procedure to address the dispute resolution issue.

If this project continues forward, the IRC SRC notes that it supports the Standards Efficiency Review (SER) concepts and this project's goal to remove redundancy; but wants to ensure that the Responsible Entities (RC, BA, TOP) have the ability to request and receive any information the Responsible Entity deems necessary to perform its responsibilities. The IRC SRC asks that the drafting team be mindful that compliance obligations should not prohibit or restrict Responsible Entities from retaining or requiring additional telemetry that enhances real time monitoring capabilities (e.g., PMU, adding additional SCADA measurements), given new and more challenging technologies (e.g., inverter-based resources, distributed generation resources, co-located generation/load) are being integrated on the electric system. The IRC SRC would like to encourage the Standard Drafting Team to set high performance expectations to encourage entities to take all possible actions to promote availability of data and to incent the use of reliable technologies.

For example, telemetry availability may be percentage based (e.g., 98 to 99% on a rolling average considering forced or other unplanned outages). Finally, the IRC SRC reiterates its reservations with modifying definitions that affect Real-time monitoring and Balancing Authority analysis functions due to the unintentional impact on other standards and recommends that the drafting team avoid definition changes if possible and proceed with caution if that path is deemed necessary.

Likes 0

Dislikes 0

Response

Jennifer Malon - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Black Hills Corporation supports a risk-based approach for documentation of triggered events and unresolved data conflicts. This would reduce administrative burden while maintaining focus on risk areas.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

AZPS agrees with the redline modifications made to the SAR.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Ensure attestations continue as a method of demonstrating compliance.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

Yes

Document Name

Comment

AEP agrees with the purpose and perceived need as expressed in the proposed SAR, and sees value in pursuing it. The clarity that the SAR seeks is definitely needed and would be very beneficial. Having said that, the means by which that clarity is obtained, as well as the content of that clarity, are both important issues that industry will need to work on effectively in order to achieve a successful outcome and meaningful change to these standards. In addition, AEP encourages the members of the future Standards Drafting Team to ensure that their eventual revisions are not written in such a way that they are unduly burdensome, especially for larger entities having voluminous data points.

In order for the TOP to perform the necessary real time assessments for the entire BES, they may require data points at lower voltages which are not needed by the RC and thus not provided. The RTO, serving as the RC, should continue to define what data points they need for their own obligations (as per IRO-010), however AEP recommends that changes be made to TOP-003 to allow the TOP to define what data they need from the RC, including data that might not be required or needed by the RC for their own purposes. Examples of such data include DER data, detailed renewable energy models, and neighboring TOP sub-transmission data that the RTO may not include in their models. All of this type of external DP/GOP/TOP data should be provided by the RTO. Doing this would eliminate the need to create and maintain multiple data communication paths.

With respect to the concerns expressed above, does the SDT believe that SAR's current language would allow the future SDT to adequately address AEP's concerns where the RTO/RC accepts data points from "Entity B" that the RC/RTO may not need to use, but is needed by another "Entity A?" The RTO/RC providing this data routinely to Entity A would avoid the need for Entity A to create and maintain multiple data communication paths w/ Entity B. Further complicating matters, Entity B may not even be a NERC-registered Functional Entity. As currently written, the RC has no existing obligations within TOP-003 to provide such data. With the RTO providing the TOP the necessary data to meet TOP-003 data specifications for Real-time monitoring and RTA/OPA, the revised standards should provide clarity to each applicable entity (RTO/TOP) on which entities need to receive a data specification document from the applicable entity. We believe it would positively impact reliability and data integrity if the RTO were themselves responsible to provide real time data for all TOPs within their footprint, regardless of whether or not the RTO themselves need that data. For example, if Entity A needs data from Entity B, both residing within RTO's footprint, the RTO would then provide that data to Entity A. This would prioritize data sharing and ensure that the necessary data channels are properly functioning as needed, and thus benefiting everyone involved. We encourage the future Standards Drafting Team to pursue this as they develop their revisions to the standards.

Documented specification for the data is shared between TOPs/GOPs/DPs/etc., even though a majority, if not all, of the data is received via the RTO. To reduce the administrative burden, the documented specifications for the data, as covered by TOP-003 R1, should only be communicated to the RTOs and any entities serving as the RC who are directly supplying the TOP data. Other data requirements not covered by NERC standards would be specified in other data specification or non-NERC operating agreements. AEP believes direct data connections (i.e. not through the RTO) should be avoided if at all possible, as managing these types of special links are overly burdensome, complicate data sharing between entities, and increases the risk of non-compliance. In addition, such bi-lateral data links to individual companies may be more susceptible to data reliability issues and could have potential compliance ramifications, with TOP-001 as just one example. Additional clarity also needs to be addressed in the standards regarding the details required in the specification documents. Some entities keep the data specification documents at a very high level (which is preferred) while other entities specify individual data point names and detailed requirements in their data specification documents (not preferred).

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Yes

Document Name

Comment

We reaffirm that we consider that the data specification should be a standalone document. The data specification requirements (TOP-003-4 R1 and IRO-010-3 R1) specify clearly (in our view) that all compliance obligations must be within the data specification. Yet, a number of data specifications in our industry have references to external documents in the data specification and entities have to then find the obligations in those external documents. Sometimes the external documents have further references to other documents, requiring entities find the obligations across multiple documents. Clearly, some entities who draft data specifications therefore do not believe the data specification is standalone and that obligations can be outside the data specification We believe that having obligations spread across documents through a web of references expands and blurs the compliance obligations unnecessarily. In our view, the SDT should clarify the language to make it clear that the data specification should be standalone.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

WECC agrees with the redlines to the modifies SAR and agrees with the scope of the SAR.

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

We agree with the project, however, please consider updating the SAR to ensure that references to standards are the most recent NERC Board Adopted and/or FERC approved versions of the standards. For example, IRO-010-4 and TOP-003-5 become effective on April 1, 2023, and were part of project 2019-06 Cold Weather. FAC-014-3, IRO-008-3, and TOP-001-6 were part of project 2015-09 Establish and Communicate System Operating Limits and were NERC Board Adopted on June 11, 2021, and were filed with FERC on June 17, 2021.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEl supports the current draft of the proposed SAR for Project 2021-06.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

We support the revised SAR's stated purpose to "simplify administrative burdens" and "limit unnecessary data retention requirements" on the Registered Entities that are required to respond to the IRO-010-3 (RC) and TOP-003-4 (TOP and BA) data specifications. We also support the secondary purpose to "evaluate removing other data exchange requirements dispersed in other standards".

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 MRO NSRF appreciates the SAR SDT's additions and considerations of its comments as provided in August of 2021.

Likes 0

Dislikes 0

Response**Andy Fuhrman - Minnkota Power Cooperative Inc. - 1,5 - MRO**

Answer

Yes

Document Name

Comment

MPC supports the MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1,3**

Answer

Yes

Document Name

Comment

Exelon supports the current draft of the proposed SAR.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 5,6**

Answer

Yes

Document Name

Comment

Constellation supports the current draft of the proposed SAR.

Kimberly Turco, **On Behalf of:** Constellation, Segments 5, 6

Likes 0

Dislikes 0

Response

Alison Mackellar - Constellation - 5,6

Answer

Yes

Document Name

Comment

Constellation supports the current draft of the proposed SAR

Likes 0

Dislikes 0

Response

Mike Marshall - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

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**Karie Barczak - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy - DTE Electric****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alan Kloster - Evergy - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kenisha Webber - Entergy - NA - Not Applicable - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Darcy O'Connell - California ISO - 2

Answer

Document Name

Comment

CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

2. Provide any additional comments for the drafting team to consider, if desired.

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Document Name

Comment

SPP recommends that the drafting team take into consideration coordinating with the NERC SPIDERWG and their efforts in reference to their MOD-032 SAR. We understand that MOD-032 doesn't meet the scope of this project. However, at this point, our concern is that the both standards are used in the process for data acquisition and doesn't have the foundational language to enable an entity to obtain the pertinent data needed to perform accurate studies (for example- planning and/or ops modeling data) to maintain the reliability of the grid. From our perspective, there is an opportunity for both drafting teams to work together and learn about the needs of both the requesting and sharing entities perspective in reference to data acquisition as well as ensuring the appropriate data exchange is accomplished with the common goal of maintaining the reliability of the grid.

Furthermore, SPP recommends that the drafting team take into consideration delaying the project until the 2021-07 Extreme Cold Weather Grid Operations, Preparedness and Coordination project is completed. Both projects touch the same standards. Depending on the timing of the projects and filings, two projects changing the same standards have the potential to conflict with or fail to support what the other does.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Thank you for the opportunity to provide comments.

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 SAR

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The MRO NSRF has no additional comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The SAR is acceptably written to “simplify the administrative burdens” and “eliminate redundant requirements found in other NERC reliability standards.” The drafting team will need to be cautious as it progresses through the revision process so that the two standards (IRO-010 and TOP-003) are not made more complicated and burdensome. The reliability information necessary to plan, monitor, assess, and operate the Bulk Power System is vital to the RC, TOP, and BA. With the intent to enhance IRO-010 and TOP-003, the standard drafting team needs to guard against burdening the registered entities with complicated data clarifications and additional administrative requirements.

Should the “Date Submitted” row near the top of the SAR also be revised to reflect the date the updated SAR Requester submitted the proposed revisions?

“Detailed Description” section - some of the standards noted in parenthesis with the four bulleted tasks listed on page 4 of the SAR have been superseded (TOP-001-4 by TOP-001-5; IRO-002-5 by IRO-002-7; BAL-003-1.1 by BAL-003-2).

With regard to other standards to be considered, we suggest the drafting team consider what use, if any, the RC, BA and TOP have for generator Facility Ratings (reference FAC-008). Under Project 2018-03 (Standards Efficiency Review Retirements), FAC-008-3, Requirement R7, was retired. In NERC’s petition to FERC requesting approval of FAC-008-5 (dated 2/19/2021), MOD-032-1, IRO-010-2, and TOP-003-3 were specifically cited as justification for retiring FAC-008-3, Requirement R7. However, neither MOD-032-1, IRO-010-3 or TOP-003-4 use the term “Facility Rating” to describe an item of GO/GOP data needed by the PC/TP (MOD-032), RC (IRO-010), or BA/TOP (TOP-003). We recommend the Project 2021-06 drafting team

coordinate with the Project 2021-08 (Modifications to FAC-008) drafting team to consider and clarify what a generator Facility Rating is and identify which operational entities need this information for “safe, secure and reliable operations”.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

EEl suggests that the SAR be updated to reflect that IRO-010-4 and TOP-003-5 were both approved by the NERC BOT (June 11, 2021) and FERC on August 24, 2021. (See Project 2019-06 Cold Weather)

EEl additionally suggests that the current list of Reliability Standards identified in the Detailed Description be modified to include changes made under other projects and currently submitted for FERC approval. Note the following:

- BAL-005-1 R2
- EOP-005-3 R13
- EOP-005-3 R14.2
- FAC-014-2 R5 – *EEl suggest evaluating the modifications made to FAC-014-3 (Submitted to FERC for approval on 6/28/2021).*
- *FAC-014-2 R6.1. - Suggest evaluating changes made to FAC-014-3 (Submitted to FERC for approval on 6/28/2021). Requirement R6.1 no longer exists in FAC-014-2.*
- *IRO-008-2 R5 - Suggest evaluating changes made to IRO-008-2 (Submitted to FERC for approval on 6/28/2021)*
- *IRO-008-2 R6 - Suggest evaluating changes made to IRO-008-2 (Submitted to FERC for approval on 6/28/2021)*
- IRO-017-1 R3
- *TOP-001-5 R9 - Suggest replacing with TOP-001-6, while the requirement was not changed the SDT should be reviewing the latest version submitted to FERC for approval. (Submitted to FERC for approval on 6/28/2021)*
- *TOP-001-5 R15 - Suggest replacing with TOP-001-6, while the requirement was not changed the SDT should be reviewing the latest version submitted to FERC for approval. (Submitted to FERC for approval on 6/28/2021)*
- VAR-002-4.1 R3
- VAR-002-4.1 R4

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Alan Kloster - Evergy - 1,3,5,6 - MRO

Answer

Document Name

Comment

Evergy supports and incorporates by reference Edison Electric Institute's (EEI) response to question 2.

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 proposes an alternative means of reducing the administrative burden and mitigating the zero-deficit compliance expectations of data retention that also preserves the language for Reliability Coordinators, Transmission Operators, and Balancing Authorities to require requested data from providers.

We propose that the RC, TOP, and BA requestors identify important/critical information within their data request. The information that is identified as important/critical to the requestor would then need to be tied back to the four tasks identified in IRO-010 and TPO-003. Using this alternative, the requestor would preserve their ability to require data deemed necessary from the provider, but the information requested, which was not identified as important/critical by the requestor, would not be held to the same zero-deficit data retention compliance standards for the provider.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE agrees there could be efficiencies gained by clarifying certain actions in the standards. Texas RE continues to have the following concerns with the SAR, which include risk-based data specification, reliability-related tasks, and possible retirements. The SAR drafting team's approach is simply assuming these requirements will be handled by the data specification requirements. There are no obligations for what exactly needs to be in the data specification requirements. The Project 2014-03 drafting team stated several times that FERC has made it clear that the assumption cannot be made on something based on other requirements that dictate certain actions. This SAR appears to be assuming that actions will be taken on data based on a data specification in which there are no requirements. Texas RE has several additional concerns, including the statement regarding a zero-defect expectation, proposing risk-based data specification requirements, the four reliability-related tasks, and the requirements proposed for possible retirement.

Texas RE is unclear on how a risk-based approach would achieve the purpose of the standards in an effective and efficient manner. Texas RE is concerned that problems may not be identified if performance oversight is only triggered by significant events or unresolved data conflicts. In order for the system to be operated in a reliable manner, constant and consistent data must be provided. While Texas RE generally supports risk-based

compliance approaches, Texas RE believes that such approaches are best determined within the framework of the specific data specification itself rather than prescribed through the IRO-010 data specification standard itself.

Texas RE does not agree that there are only the four reliability-related tasks specified in the SAR. “Core BES reliability-related tasks” are defined in the SAR by only four tasks, all of them operational, and contained only in the eight Standards specified. Other reliability-related tasks do exist but do not fit in the four categories described in the SAR.

For example, modeling data dictates OPA, RTA, and Real-time monitoring results but is not listed. Based on the language provided, the SAR drafting team envisions that OPA, RTA, or Real-time monitoring will be performed and therefore the entity is “compliant” without ever having any obligation to ensure it receives quality inputs to provide quality output, which would help ensure reliability. This could lead to inconsistencies and diminished accountability for inadequate data specifications, especially for those that lack information necessary to support reliable operations.

The core reliability-related tasks do not include data provisions (EOP-005, IRO-017) because they would not be associated with the OPA or RTA within the IRO-010 and TOP-003 data specifications. As this data would impact reliability studies that occur after the Long-term Planning Horizon, but significantly before the next-day studies, it appears there is a gap in the Standards.

Texas RE does not agree that RTA and OPA need further clarification. Industry should be aware of what is needed regarding these tasks since there are NERC defined terms and ERO endorsed Implementation Guidance on RTA. A definition for Real-time monitoring could help in providing clarity on expectations.

Texas RE is concerned that the requirements being proposed for retirement have to do with conditions that are not part of the OPA and RTA as the data specifications requirements are intended.

For example, notification of changes to the capabilities of a Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan may require a TOP to modify its restoration plan. This evaluation and modification would not be within the scope of the OPA or RTA, unless the SDT plans to include these tasks as part of its clarification the core BES reliability-related tasks.

Additionally, IRO-017-1 R3 requires provision of the Planning Assessment to the RC so the TP and PC can jointly develop solutions with its respective RC for identified issues or conflicts with planned outages in its Planning Assessment. As outages are scheduled and coordinated months if not years in advance, relying on entities to identify and resolve these issues or conflicts through the OPA and RTA is not practical.

Another example is that voltage control is not part of one of the core reliability-related tasks, which could lead to voltage collapse if it is not considered in the data specification.

Texas RE is concerned that entities may not include specific data points that are being proposed for removal in its data specification. This will lead to inconsistencies in implementation and could lower the bar for reliability if entities do not consider certain data points. The SAR drafting team should not assume that all entities will have the same reliability tasks and all entities will consider the same data specifications. Making the requirements general

in nature lowers the compliance requirements and increases the risk that data management will not be done in an effective manner to support reliable operations.

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

Karie Barczak - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

none at this time

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

Document Name

Comment

The RF SAR review team is not in favor of pursuing this project. However, under Detailed Description, the removal of "coordinate with pre-qualified organizations to" has resulted in the sentence no longer being grammatically correct. Were this SAR to move forward, we recommend the statement be revised to "develop Implementation Guidance and/or work with NERC staff to develop other ERO guidance..."

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response