## **Standard Development Timeline**

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### **Development Steps Completed**

SAR posted for comment February 21, 2014 to March 24, 2014

### **Proposed Action Plan and Description of Current Draft**

This is the first posting of the revised standard under Project 2014-03 Revisions to the TOP/IRO Reliability Standards. The SDT is working under a deadline for filing the revised standards with FERC of January 15, 2015.

Anticipated Actions	Anticipated Date
Additional ballot	August 2014
Final ballot	October 2014
ВОТ	November 2014

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# **Version History**

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1		Modified R1.2 Modified M1 Replaced Levels of Non-compliance with the Feb 28, BOT approved Violation Severity Levels (VSLs)	Revised
1	October 17, 2008	Adopted by NERC Board of Trustees	
1	March 17, 2011	Order issued by FERC approving TOP- 003-1 (approval effective 5/23/11)	
2	May 9, 2012	Adopted by Board of Trustees	Revised
3	April 2014	Changes pursuant to Project 2014-03	Revised

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#### **Definitions of Terms Used in Standard**

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

There are no new or revised definitions proposed in this standard revision.

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When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.

#### A. Introduction

1. Title: Operational Reliability Data

2. Number: TOP-003-3

**3. Purpose:** To ensure that the Transmission Operator and Balancing Authority have data needed to fulfill their operational and planning responsibilities.

#### 4. Applicability:

- **4.1.** Transmission Operator
- **4.2.** Balancing Authority
- 4.3. Generator Owner
- **4.4.** Generator Operator
- **4.5.** Interchange Authority
- 4.6. Load-Serving Entity
- 4.7. Transmission Owner
- 4.8. Distribution Provider

#### 5. Effective Date:

All requirements except Requirement R5 shall become effective on the first day of the first calendar quarter that is ten (10) months after the date that the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is ten (10) months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

Requirement R5 shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date that the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

#### 6. Background:

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On April 16, 2013, NERC submitted two petitions requesting Commission approval of TOP and IRO standards. One petition addresses three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards. The <a href="second petition">second petition</a> addresses four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards.

On November 21, 2013, the Commission issued a <u>NOPR</u> proposing to remand these TOP and IRO Standards, stating that NERC "has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards." For example, the Commission cites the fact that the proposed TOP Standards do not require Transmission Operators to plan and operate within all System Operating Limits ("SOLs"), which is a requirement in the currently-effective standards.

On December 20, 2013, NERC filed a <u>motion</u> requesting that the Commission defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR and afford time to review the proposed TOP and IRO Standards through the NERC standards development process to ensure that a technically justified set of solutions is in place for reliability. That motion to defer action was granted on January 14, 2014.

On February 12, 2014, the Standards Committee appointed a Standard Drafting Team to take on the task of revising the aforementioned standards in response to the NOPR issues and the recommendations made by the Independent Expert Review Panel, the IRO FYRT, and the SW Outage Report.

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#### **B.** Requirements and Measures

**Rationale:** Changes to proposed Requirement R1, part 1.1 is in response to issues raised in NOPR paragraph 67 on the need for obtaining sub-100 kV and external network data necessary for the Transmission Operator to fulfill its responsibilities.

Proposed Requirement R1, part 1.2 is in response to NOPR paragraph 78 on relay data. Language moved from approved PRC-001-1.

Corresponding changes have been made to Requirement R2 for the Balancing Authority and to proposed IRO-010-2, Requirement R1 for the Reliability

- **R1.** Each Transmission Operator shall maintain a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. The data specification shall include, but not be limited to: [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
  - **1.1.** A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including sub-100 kV data and external network data as deemed necessary by the Transmission Operator.
  - **1.2.** Provisions for notification of current Protection System and Special Protection System status or degradation that impacts System reliability.
  - **1.3.** A periodicity for providing data.
  - **1.4.** The deadline by which the respondent is to provide the indicated data.
- **M1.** Each Transmission Operator shall make available its dated, current, in force documented specification for data.
- **R2.** Each Balancing Authority shall maintain a documented specification for the data necessary for it to perform its analysis functions and Real-time monitoring. The data specification shall include, but not be limited to: [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
  - **2.1.** A list of data and information needed by the Balancing Authority to support its analysis functions and Real-time monitoring.
  - **2.2.** Provisions for notification of current Protection System and Special Protection System status or degradation that impacts System reliability.
  - **2.3.** A periodicity for providing data.
  - **2.4.** The deadline by which the respondent is to provide the indicated data.
- **M2.** Each Balancing Authority shall make available its dated, current, in force documented specification for data.

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- **R3.** Each Transmission Operator shall distribute its data specification to entities that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessment. [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
- M3. Each Transmission Operator shall make available evidence that it has distributed its data specification to entities that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. Such evidence could include but is not limited to, web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.
- **R4.** Each Balancing Authority shall distribute its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring. [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
- **M4.** Each Balancing Authority shall make available evidence that it has distributed its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, or e-mail records.

**Rationale for Requirement R5**: Proposed Requirement R5, part 5.3 is in **r**esponse to NOPR paragraph 92 where concerns were raised about data exchange through secured networks.

- R5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall satisfy the obligations of the documented specifications using: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
  - **5.1.** A mutually agreeable format
  - **5.2.** A mutually agreeable process for resolving data conflicts
  - **5.3.** A mutually agreeable security protocol
- **M5.** Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall make available evidence that it has satisfied the obligations of the documented specifications. Such evidence could include, but is not limited to, electronic or hard copies of data transmittals or attestations of receiving entities.

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#### C. Compliance

#### 1. Compliance Monitoring Process

### 1.1. Compliance Monitoring Process

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Compliance Monitoring and Enforcement Processes

**Compliance Audit** 

Self-Certification

**Spot Checking** 

**Compliance Investigation** 

Self-Reporting

Complaint

#### 1.3. Data Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

Each responsible entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- Each Transmission Operator shall retain its dated, current, in force, documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R1 and Measurement M1 as well as any documents in force since the last compliance audit.
- Each Balancing Authority shall retain its dated, current, in force, documented specification for the data necessary for it to perform its analysis functions and Real-time monitoring in accordance with Requirement R2 and Measurement M2 as well as any documents in force since the last compliance audit.
- Each Transmission Operator shall retain evidence for three calendar years that it has distributed its data specification to entities that have data required by the Transmission Operator's Operational Planning Analyses,

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Real-time monitoring, and Real-time Assessments in accordance with Requirement R3 and Measurement M3.

- Each Balancing Authority shall retain evidence for three calendar years that it has distributed its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring in accordance with Requirement R4 and Measurement M4.
- Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall retain evidence for the most recent 90calendar days that it has satisfied the obligations of the documented specifications in accordance with Requirement R5 and Measurement M5.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.4. Additional Compliance Information

None.

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# **Table of Compliance Elements**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Low	The Transmission Operator did not include one of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Transmission Operator did not include two of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Transmission Operator did not include three of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Transmission Operator did not include four of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments. OR, The Transmission Operator did not have a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.

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R #	Time Horizon	VRF	Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
R2	Operations Planning	Low	The Balancing Authority did not include one of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	The Balancing Authority did not include two of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	The Balancing Authority did not include three of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	The Balancing Authority did not include four of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.  OR, The Balancing Authority did not have a documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	
the left	For the Requirement R3 and R4 VSLs only, the intent of the SDT is to start with the Severe VSL first and then to work your way to the left until you find the situation that fits. In this manner, the VSL will not be discriminatory by size of entity. If a small entity has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation.						
R3	Operations Planning	Low	The Transmission Operator did not distribute its data	The Transmission Operator did not distribute its data	The Transmission Operator did not distribute its data	The Transmission Operator did not distribute its data	

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			specification to one entity, or 5% or less of the entities, whichever is less, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	specification to two entities, or more than 5% and less than or equal to10% of the reliability entities, whichever is less, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	specification to three entities, or more than 10% and less than or equal to 15% of the reliability entities, whichever is less, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	specification to four or more entities, or more than 15% of the entities, whichever is less, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and real-time Assessments.
R4	Operations Planning	Low	The Balancing Authority did not distribute its data specification to one entity, or 5% or less of the entities, whichever is less, that have data required by the Balancing Authority's analysis functions and Real- time monitoring.	The Balancing Authority did not distribute its data specification to two entities, or more than 5% and less than or equal to 10% of the entities, whichever is less, that have data required by the Balancing Authority's analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to three entities, or more than 10% and less than or equal to 15% of the entities, whichever is less, that have data required by the Balancing Authority's analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to four or more entities, or more than 15% of the entities, whichever is less, that have data required by the Balancing Authority's analysis functions and Real-time monitoring.

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R5	Operations Planning, Same-Day Operations, Real-time Operations	Medium	N/A	N/A	N/A	The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy the obligations of the documented specifications for data.

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## **D. Regional Variances**

None.

## **E.** Interpretations

None.

### **F.** Associated Documents

None.

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