Unofficial Comment Form

Technical Conferences on Revisions to TOP and IRO Reliability Standards

Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=a33f919902be4bf5ad32bca589a91e3f) to submit comments on the issues discussed during two Technical Conferences on Revisions to TOP and IRO Reliability Standards. These comments will be posted on the project webpage as part of the development record and considered by the drafting team for Project 2014-03 Revisions to TOP and IRO Reliability Standards as it develops revisions to the standards. Comments must be submitted by **8:00 p.m. Eastern on** **March 24, 2014.** If you have questions please contact Ed Dobrowolski (email) or by telephone at (609) 947-3673.

### Background Information:

NERC recently held two technical conferences on revisions to standards pertaining to real-time operations and reliability coordination (the TOP and IRO Reliability standards). The first technical conference was held on March 3 and 4, 2014 in St. Louis and the second was held on March 6, 2014 in the Washington, DC area. The purpose of these conferences was to obtain industry input on issues identified in the Federal Energy Regulatory Commission’s (FERC) notice of proposed rulemaking (NOPR) proposing to remand these standards.

In response to this NOPR, NERC filed a motion requesting that FERC defer action until January 31, 2015 to allow NERC and the industry time to consider the issues identified in the NOPR and develop revisions as needed to address them, and FERC granted the motion. Project 2014-03 was initiated to develop revisions to the TOP and IRO standards to address issues identified in the NOPR.

During the technical conferences, a presentation was used to facilitate a discussion of each of the issues identified in the NOPR. For each issue, a slide showing the language from the proposed standards along with a brief excerpt from the NOPR (along with the paragraph number) was prepared. Key points from the discussion in St. Louis were captured in a second presentation, and this presentation was provided to the participants in the second technical conference. During the second technical conference, additional key points were captured. The two presentations are posted on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2014-03-Revisions-to-TOP-and-IRO-Standards.aspx).

During this informal comment period, NERC is requesting industry comments pertaining to the information provided in the conferences or suggestions for further consideration of issues identified in the NOPR. For purposes of discussion, these issues were grouped in three categories within the slides:

* Operating Concepts (including treatment of SOLs, operating to Most Severe Single Contingency, and unknown operating states)
* Tools and Analysis, including Real-time Contingency Analysis
* Coordination and Communication (including Reliability Directive, notification of Emergencies, and outage coordination)

**Questions**You do not have to answer all questions. Enter all comments in plain text format. Bullets, numbers, and special formatting will not be retained.

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1. In paragraphs 51 through 56 of the NOPR, the Commission expresses concerns with the treatment of System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs) within the TOP standards. In particular, the Commission believes that the system should be planned and operated within all SOLs. Paragraph 73 and 74 of the NOPR asks for clarification as to whether the proposed treatment of IROLs and SOLs represents a different approach to real-time operational assessments and operation to the Most Severe Single Contingencies, and if so, what the technical justification is for the change. Paragraph 87 of the NOPR seeks clarification on who (the Transmission Operator or Reliability Coordinator) has primary responsibility for IROLs. Paragraphs 96, 97, and 98 discuss treatment of IROLs and SOLs within the proposed IRO standards and ask for clarification on monitoring of all SOLs and IROLs. Slides 12 through 15 in the Technical Conference presentation were used to discuss these issues, and slides 2 through 6 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Please provide any comments on the concerns identified by the Commission on the treatment of SOLs and IROLs, including planning and operating within all SOLs, planning to and operating to the Most Severe Single Contingency, and responsibility for monitoring of IROLs and SOLs, within the proposed standards.

**Comments:**

1. In Paragraph 61 of the NOPR, the Commission asks for a schedule for completion of Project 2009-02 Real-time Monitoring and Analysis Capabilities. Paragraphs 74 and 75 of the NOPR identify possible concerns associated with lack of adequate situational awareness. The retirement in the proposed TOP and IRO standards of requirements to address monitoring and analysis capabilities may create a gap without the completion of Project 2009-02 or modifications to the proposed TOP and/or IRO standards. Please provide any comments or suggestions you have on the issue of system monitoring and analysis. Slides 19 and 21 in the Technical Conference presentation were used to discuss these issues, and slides 8 and 10 of the Notes presentation provides a recap of discussion from the two Technical Conferences.

**Comments:**

1. Paragraphs 64 through 66 of the NOPR discuss the Commission’s questions on the proposed defined term Reliability Directive. Since the proposed TOP and IRO standards and defined term were filed with FERC, the Project 2007-02 drafting team has proposed a new term, Operating Instruction. Slide 24 in the Technical Conference presentation was used to discuss this issue, and slide 12 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Please provide any comments on the need for the term Reliability Directive and the questions on this term discussed in the NOPR.

**Comments:**

1. The currently enforceable TOP-004-2, Requirement R2 requires that a Transmission Operator that enters an unknown operating state …”restore operations to respect proven reliable power system limits within 30 minutes.” The proposed TOP standards do not retain the undefined term “unknown operating state” because the parenthetical definition within TOP-004-2 indicates that an unknown operating state is “any state for which valid operating limits have not been determined” and other existing standards in the FAC family require that operating limits be established and communicated. In Paragraph 75 of the NOPR, the Commission identifies concerns with removal of the term “unknown operating state” from the proposed standards. Slide 16 in the Technical Conference presentation was used to discuss this issue, and slide 6 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Please provide any comments you have on the removal of the requirement to mitigate an “unknown operating state” by restoring operations to within proven reliability limits within 30 minutes.

**Comments:**

1. Paragraph 78 of the NOPR concerns the proposed retirement of requirements from PRC-001-1 that address corrective actions. Slide 25 in the Technical Conference presentation was used to discuss this issue, and slide 13 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Please provide any comments you have on the proposed retirement of requirements from PRC-001-1.

**Comments:**

1. Paragraphs 80 through 83 of the NOPR discuss concerns with notification of Emergencies, including the operational time horizon for such notifications. Slide 26 in the Technical Conference presentation was used to discuss this issue, and slide 14 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Do you agree that a Transmission Operator should inform its Reliability Coordinator of all Emergencies or anticipated Emergencies not only in the Operations Planning time horizon, as required by proposed TOP-001-2, Requirement R3, but also in the Same-day Operations and Real-time time horizons?

**Comments:**

1. Paragraphs 68 and 90 of the NOPR identify concerns that the proposed standards no longer explicitly require coordination of outages. Slide 27 in the Technical Conference presentation was used to discuss this issue, and slide 15 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Please provide any comments you have on the issue of outage coordination.

**Comments:**

1. Paragraphs 93 and 94 of the NOPR discuss concerns with removing language that requires data exchange to be conducted using a secure network. Slide 28 in the Technical Conference presentation was used to discuss this issue, and slide 16 in the Notes presentation provides a recap of discussion from the two Technical Conferences. Please provide any comments you have on this issue.

**Comments:**

1. Please provide any additional comments you have for the drafting team on the issues identified in the NOPR.

**Comments:**