Standard Authorization Request (SAR) Form

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

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

Requested information						
SAR Title:		Standards Alignment with Registration				
Date Submitted:						
SAR Requester	SAR Requester					
Name: Revised by Project 2017-07 Stand Stephen Wendling, Chair		lards Alignment with Registration SAR Drafting Team				
Organization:						
Telephone: (608) 877-8232		.32	Email:	swendling@atcllc.com		
SAR Type (Checl	k as many as a	apply)				
 New Standard Revision to Existing Standard Add, Modify or Retire a Glossary Term Withdraw/retire an Existing Standard 		 Imminent Action/ Confidential Issue (SPM Section 10) Variance development or revision Other (Please specify) 				
Justification for prioritize develo	· ·	d standard developm	ient proj	ect (Check all that apply to help NERC		
 Regulatory Initiation Emerging Risk (Reliability Issues Steering Committee) Identified Reliability Standard Development Plan 		Er	ERC Standing Committee Identified hanced Periodic Review Initiated dustry Stakeholder Identified			
Industry Need (What Bulk Ele	ctric System (BES) re	liability b	enefit does the proposed project provide?):		
This project will initiative.	align the Reli	ability Standards wit	h the out	come of the Risk-Based Registration (RBR)		
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):						
This project would modify Reliability Standards to be consistent with the FERC-approved changes to registration as part of the RBR initiative.						
Project Scope (Define the parameters of the proposed project):						
This project will review and align Reliability Standards impacted by the RBR initiative.						
Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to						
execute the project. If you propose a new or substantially revised Reliability Standard or definition,						
provide: (1) a technical justification ¹ which includes a discussion of the reliability-related benefits of						
developing a new or revised Reliability Standard or definition, and (2) a technical foundation document						
(e.g. research paper) to guide development of the Standard or definition):						
This project will formally address any remaining edits to the Reliability Standards that are needed to						
align the existing standards with the RBR initiatives. The edits include updates to the BAL, CIP, FAC, INT,						
IRO, MOD, NUC, and TOP family of standards to remove the references to Purchasing-Selling Entities						

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

Requested information

(PSEs) and Interchange Authorities (IAs); references to the Load-Serving Entity (LSEs) will be removed or replaced by either the Distribution Provider (DP), the Balancing Authority (BA), or the appropriate functional applicable entity. Additionally, tThe project will include adding Underfrequency Load Shedding (UFLS)-only Distribution Providers (DPs) to the Applicability Section-section of PRC-005 and PRC-006 per NERC registration criteria.; and review the Applicability sections of PRC 004 and PRC 008 and revise, as appropriate, to add UFLS only DPs. Additionally, the project will consider whether to include a definition for UFLS into the NERC Glossary of Terms, as well as review the standards to ensure consistent use of the term Planning Coordinator.

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

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

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

No additional costs outside of the time and resources needed to serve on the SAR and Standard Drafting Team.

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

None

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

Requested information

Since LSE is being removed or replaced by either the Distribution Provider (DP), the Balancing Authority (BA), or the appropriate Applicable Entity for the standards that need to be updated, those entities will likely be best suited for the MOD and PRC updates.

Do you know of any consensus building activities² in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

None

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so which standard(s) or project number(s)?

None

Are there alternatives (e.g. guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

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

Market Interface Principles			
Does the proposed standard development project comply with all of the following			
Market Interface Principles?			
 A reliability standard shall not give any market participant an unfair competitive advantage. 	Yes		
 A reliability standard shall neither mandate nor prohibit any specific market structure. 	Yes		
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes		

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

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

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

For Use by NERC Only

SAR Status Tracking (Check off as appropriate)

Draft SAR reviewed by NERC Staff

Draft SAR presented to SC for acceptance

DRAFT SAR approved for posting by the SC

Final SAR endorsed by the SC
 SAR assigned a Standards Project by NERC
 SAR denied or proposed as Guidance document

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January X <u>December 11</u> , 2017	Standards Information Staff	Revised
<u>3</u>	February 1, 2018	Standards Information Staff	<u>Revised</u>